PUBLIC DISCLOSURE

April 6, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

All One Credit Union
Certificate Number: 66699

20 Adams Street
Leominster, Massachusetts 01453

Division of Banks
One Federal Street, Suite 710
Boston, Massachusetts 02110

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the Division of Banks concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory.**

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-share ratio (LTS) is reasonable given the institution's size, financial condition, and assessment area credit needs.
- The credit union made a majority of its home mortgage loans and consumer loans inside the assessment area.
- The geographic distribution of home mortgage loans and consumer loans reflects reasonable dispersion throughout the assessment area.
- The distribution of home mortgage loans and consumer loans to individuals of different income levels is more than reasonable.
- The credit union did not receive any CRA-related complaints since the previous evaluation; The credit union has a reasonable record relative to its fair lending policies and procedures.

The Community Development Test is rated High Satisfactory .

- All One Credit Union demonstrated more than reasonable responsiveness to community development needs in its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area.

SCOPE OF EVALUATION

General Information

The Community Reinvestment Act (CRA) requires the Division of Banks to use their authority when examining financial institutions subject to their supervision, to assess the institution's record of meeting the needs of its entire assessment area, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the Division must prepare a written evaluation of the institution's record of meeting the credit needs of its membership.

This evaluation covers the period from the prior evaluation dated March 13, 2023, to the current evaluation dated April 6, 2026. Examiners used Intermediate Small Institution Examination Procedures to evaluate the credit union's CRA performance. These procedures include the Lending Test, and the Community Development Test.

The Lending Test considered the credit union's performance according to the following criteria:

- Loan-to-Share (LTS) Ratio
- Assessment Area Concentration
- Geographic Distribution
- Borrower Profile
- Response to CRA-related complaints and Fair Lending Program

The Community Development Test considered the following factors:

- Number and dollar amount of community development activity, including qualified services, qualified investments, and community development loans.
- The responsiveness of such activities to the community development needs of the area.

Loan Products Reviewed

Examiners determined the major product lines are home mortgage loans and consumer loans, considering the credit union's business strategy and the number and dollar volume of loans originated during the evaluation period.

Examiners reviewed home mortgage loans reported on the credit union's 2024 and 2025 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs). The credit union originated 642 HMDA-reportable loans totaling $94.7 million in 2024 and 492 HMDA-reportable loans totaling $79.2 million in 2025. Examiners compared the credit union's 2024 and 2025 performance to available demographic data, and aggregate data to 2024. The 2025 aggregate data was not available at the time of the evaluation.

For consumer loans, examiners reviewed data from All One Credit Union's record for loans originated in 2024 and 2025 to draw conclusions about consumer lending performance. The credit union originated 2,625 consumer loans totaling $52.9 million in 2024, and 2,385 consumer loans totaling $55.3 million in 2025.

For the Lending Test, examiners reviewed and presented the number and dollar volume of home mortgage loans and consumer loans. While the tables throughout this evaluation include both the number and dollar volume of loans, examiners emphasized the performance by number of loans, as this better indicates the number of individuals served.

For the Community Development Test, examiners drew conclusions based on data provided by credit union management on community development loans, qualified investments, and retail and community development services since the prior CRA evaluation dated March 13, 2023.

DESCRIPTION OF INSTITUTION

Background

All One Credit Union, previously known as Leominster Credit Union, is a member-owned, not-for-profit cooperative institution originally chartered by the Commonwealth of Massachusetts in 1954. Membership is limited to those living, working, or having business within Worcester, Middlesex, Franklin, Hampden, Hampshire, or Norfolk counties in Massachusetts. Since the prior examination, membership eligibility was expanded to also include family members of existing members, as well as for members of religious, civic, or charitable organizations having their principal place of business within above mentioned counties. All One Credit Union maintains its subsidiary with AOCU Insurance Services, LLC. As of December 31, 2025, the credit union has 36,759 members. All One Credit Union received a “Satisfactory” rating from the Massachusetts Division of Banks during its prior evaluation using the Intermediate Small Institution Examination Procedures, published March 13, 2023. The Lending Test was assigned a “Satisfactory” and the Community Development Test was assigned a “High Satisfactory”.

Operations

The credit union offers products and services through 11 branches (7 full-service and 4 limited service), including its main office at 20 Adams Street, Leominster, MA located in a middle-income census tract. All branch locations include Clinton (2), Holden (2), Leominster (2), Worcester (3), Sterling, and Fitchburg, of which one branch located in Worcester is in a low-income census tract, and one branch located in Worcester is in a moderate-income census tract. Of the 11 branches, four are limited-service high school branches (Clinton, Fitchburg, Holden, and Worcester) and operate within school hours. Aside from the Worcester Technical High School branch, the high school branches are not open to the general public. Since the prior examination, the credit union opened two limited-service branches and did not close any branches. The Fitchburg High School branch was opened in 2023 and located within a middle-income census tract, the other branch opened in 2025 at Worcester Technical High School and is situated in a moderate-income tract.

The credit union offers a variety of banking products and services, including personal and business accounts to members. Members can open checking accounts, savings accounts, Certificates of Deposits, Individual Retirement Accounts, and Business checking accounts. Services that are offered include Online Banking and Mobile Banking with the credit union’s mobile banking app. Additional benefits include using Apple Pay, Google Pay, and Samsung Pay. In addition to deposit accounts, credit union members can apply for mortgage loans, home equity loans and lines of credit, personal, new, and used auto loans, and an All One branded credit card. Also, business lending offers commercial real estate loans and business lines of credit. Since the prior examination, the credit union added construction and credit builder loans. The credit union is part of the SUM, NYCE and MoneyPass ATM networks, which allow members to perform ATM transactions, surcharge-free, at over 30,000 participating ATMs.

Ability and Capacity

As of December 31, 2025, assets totaled approximately $869.2 million, and shares totaled $691.6 million. Total loans were $629.5 million, representing approximately 72.4 percent of total assets. Since the previous CRA evaluation, assets decreased by 1.7 percent and the lending portfolio increased by 1.4 percent. The following table illustrates residential lending accounts for the largest concentration of loans at 59.3 percent of the lending portfolio.

Loan Portfolio Distribution as of 12/31/2025		
Loan Category	**$(000s)**	**%**
Unsecured Credit Card Loans	0	0.0
Non-Federally Guaranteed Student Loans	1,770,637	0.3
All Other Unsecured Loans/LOCs	3,661,191	0.6
New Vehicle Loans	15,819,526	2.5
Used Vehicle Loans	141,221,672	22.4
All Other Secured Non-Real Estate Loans/LOCs	32,527,747	5.2
Total Loans/LOCs Secured by 1st Lien 1-4 Family Residential Properties	229,767,402	36.5
Total Loans/LOCs Secured by Junior Lien 1-4 Family Residential Properties	143,832,989	22.8
Commercial Loans/Lines of Credit Real Estate Secured	47,391,149	7.5
Commercial Loans/Lines of Credit Non-Real Estate Secured	13,501,166	2.1
Total Loans	629,493,479	100.0
Source: Reports of Condition and Income		

Examiners did not identify any financial, legal, or other impediments that affect the credit union's ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its CRA performance. All One Credit Union has designated one single assessment area, which includes 31 cities and towns located in Worcester and Middlesex Counties in Massachusetts. The assessment area, as currently defined, meets the technical requirements of the Division of Bank's CRA regulation. The following table is a list of cities and towns the credit union has designated as their assessment area.

Worcester County					
Ashburnham	Auburn	Berlin	Bolton	Boylston	Clinton
Fitchburg	Gardner	Grafton	Harvard	Holden	Hubbardston
Lancaster	Leicester	Leominster	Lunenburg	Millbury	Oakham
Paxton	Princeton	Rutland	Shrewsbury	Sterling	Templeton
West Boylston	Westminster	Winchendon	Worcester		
Middlesex County					
Ashby	Shirley	Townsend			

Economic and Demographic Data

The credit union's assessment area consists of 130 census tracts that reflect the following income designations according to the 2020 American Community Survey (ACS):

- 20 low-income tracts,
- 27 moderate-income tracts,
- 51 middle-income tracts,
- 29 upper-income tracts, and
- 3 census tracts with no income designation.

The assessment area's low-income census tracts are located in Gardner, Leominster, Fitchburg (3) and Worcester (15). The moderate-income census tracts are located in Gardner (4), Leominster (2), Fitchburg (7), Millbury, and Worcester (13). The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	130	15.4	20.8	39.2	22.3	2.3
Population by Geography	581,789	14.4	19.8	39.5	25.1	1.3
Housing Units by Geography	224,927	14.3	20.6	40.6	23.8	0.7
Owner-Occupied Units by Geography	131,592	3.7	15.8	48.2	32.2	0.1
Occupied Rental Units by Geography	78,701	30.5	27.7	29.4	10.8	1.7
Vacant Units by Geography	14,634	23.3	24.7	32.2	18.9	0.9
Businesses by Geography	50,615	15.4	18.5	38.6	26.4	1.2
Farms by Geography	1,384	5.1	10.0	48.6	35.9	0.3
Family Distribution by Income Level	133,012	25.2	17.3	20.1	37.3	0.0
Household Distribution by Income Level	210,293	27.3	15.6	16.7	40.4	0.0
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA		$121,481	Median Housing Value			$275,550
Median Family Income MSA - 49340 Worcester, MA MSA		$99,320	Median Gross Rent			$1,097
			Families Below Poverty Level			7.4%

Source: 2020 ACS, 2025 D&B Data, and FFIEC Estimated Median Family Income;
(*) The NA category consists of geographies that have not been assigned an income classification.

There are 224,927 housing units in the area. Owner-occupied housing units account for 58.5 percent of the housing stock, rental units account for 35.0 percent of the housing stock, and the remaining 6.5 percent of units are vacant. Within the 47 low- and moderate -income tracts, owner -occupied housing units account for 19.5 percent of total units, compared to 80.4 percent in the middle- and upper-income census tracts. This suggests' limited owner-occupied housing stock in low- and moderate-income census tracts.

According to the 2020 ACS data, the median housing value in the assessment area is $275,550. The 2020 ACS Data also shows that 7.4 percent of the population in the assessment area are below the poverty level, which is a subset of the low-income category. These families generally face financial hardship and would likely not qualify for traditional home mortgage loans. Additionally, low-income census tracts contain only 3.7 percent of the areas owner-occupied housing units, which limits opportunities for institutions to make home mortgage loans in these geographies compared to the percentage of owner-occupied units in other geographies.

The FFIEC Median Family Income level is used to analyze home mortgage loans under the Borrower Profile criterion. The following table displays the low-, moderate-, middle-, and upper income categories for each year during the review period.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
Cambridge-Newton-Framingham, MA Median Family Income (15764)				
2024 ($146,600)	<$73,300	$73,300 to <$117,280	$117,280 to <$175,920	≥$175,920
2025 ($155,300)	<$77,650	$77,650 to <$124,240	$124,240 to <$186,360	≥$186,360
Worcester, MA MSA Median Family Income (49340)				
2024 ($114,100)	<$57,050	$57,050 to <$91,280	$91,280 to <$136,920	≥$136,920
2025 ($122,700)	<$61,350	$61,350 to <$98,160	$98,160 to <$147,240	≥$147,240
Source: FFIEC				

Data obtained from the U.S. Bureau of Labor Statistics indicates that the 2024 annual average unemployment rate was 4.0 percent statewide, 4.1 percent in Worcester County, and 3.6 percent in Middlesex County. Similarly, a low- income family earning $77,650 in Middlesex County or $61,350 in Worcester County, and a poverty level of 4.8 percent in the state, may suggest challenges for low-income families qualifying for a residential home mortgage loan.

<u>Competition</u>

Financial services are highly competitive within the credit union's assessment area. According to the 2024 Market Share data, there are 42 financial institutions operating 185 full-service branches in the assessment area. Of these institutions, All One Credit Union ranks 7th with a 3.7 percent deposit market share by dollar amount, while the top four institutions collectively hold over 38.9 percent deposit market share by dollar amount.

There is also a high level of competition for home mortgage loans among several banks, credit unions and non-depository lenders in the institutions assessment area. In 2024, there were 436 lenders that originated or purchased 20,056 home mortgage loans. All One Credit Union ranked 3rd with a 3.4 percent market share ranking below Fidelity Co-perative Bank and TD Bank, N.A.

Community Contact

As part of the evaluation process, examiners contact third parties that are active in the assessment area to understand the credit and community development needs of the area. The information obtained helps to determine whether local financial institutions are responsive to those needs. The information also shows what credit and community development opportunities are available.

Examiners contacted a representative of an organization that assists with economic development and affordable housing activities within the assessment area. The contact identified high capital costs and low return on investment for economic development projects, such as multifamily real estate construction, to be a major challenge in the area. The City of Worcester in particular, which is the assessment area's largest urban center, has experienced rapid population growth over recent years, so there is a need for seasoned developers to plan and initiate affordable housing projects. Developers rely on subsidies from state and municipal governments for these types of projects and require additional financing assistance.

The contact also noted that prospective homebuyers in the assessment area could benefit from down payment assistance programs and loan products with low down payments. Existing homeowners are also in need of flexible loans for energy-related upgrades and lead paint removals, particularly because most existing houses in the assessment area were constructed over 50 years ago. The contact identified high startup costs, rising costs of goods, and local and state regulatory changes as some of the main challenges impacting small businesses.

Additionally, the contact indicated that the city of Worcester is an area with a particularly diverse population that speaks over 90 unique languages, and many people with a limited understanding of English are less knowledgeable of the products and services that local financial institutions offer to customers. Therefore, there is potential for financial institutions to connect with these communities through initiatives such as multi-lingual financial education seminars and workshops.

Credit and Community Development Needs and Opportunities

Based on information from the community contact, credit union management, and demographic data, examiners determined that affordable housing, revitalization projects in low- and moderate - income census tracts, community development investments, and financial education initiatives are all needed in the assessment area. The disparities between property values and the income level of low-income families demonstrate the need for affordable housing. In addition, there is a need for revitalization and stabilization projects in the assessment area. The reliance of residential developers on state subsidies and municipal grants for new housing projects highlights a need for community development investments. Examiners determined that down payment assistance programs and loan products with flexible underwriting standards are major credit needs in the assessment area. Some specific examples of these loan products include first-time homebuyer loans with no down payment requirements, MassSave HEAT loans, and small business loans.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

All One Credit Union demonstrated Satisfactory performance under the Lending Test. The following sections summarize the credit union's overall performance under each criterion

Loan-to-Share Ratio

The credit union's average Loan-to-Share (LTS) ratio is reasonable given the credit union's size, financial condition, and credit needs of its assessment area. The average LTS ratio is calculated from credit union Call Report data over the last eight calendar quarters from March 31, 2024, to December 31, 2025. The average ratio for the evaluation period is 94.1 percent, which reached a high of 95.2 percent on September 30, 2024, and a low of 90.0 percent on December 31, 2025. Examiners selected two similarly situated institutions based on asset size, geographic location, and lending focus. The credit union's average net LTS ratio was slightly higher than those similarly situated institutions. Please refer to the table below for more details.

Loan to Share Ratio		
Credit Union	**Total Assets as of 12/31/2025**	**Average Net LTS Ratio (%)**
All One Credit Union	**869,270,119**	**94.1**
St. Mary's Credit Union	1,035,464,919	92.0
Freedom Credit Union	751,797,834	93.8
Source: Reports of Condition and Income 3/31/2024-12/31/2025		

Assessment Area Concentration

A majority of the credit union's home mortgage loans and consumer loans were originated inside the assessment area. During the evaluation period, the credit union originated 77.4 percent of home mortgage loans and 50.6 percent of consumer loans inside the assessment area by number.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans				Total $(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	$(000)	%	$(000)	%	
Home Mortgage										
2024	480	74.8	162	25.2	642	65,500	69.1	29,242	30.9	94,743
2025	398	80.9	94	19.1	492	61,851	78.1	17,358	21.9	79,209
Subtotal	**878**	**77.4**	**256**	**22.6**	**1,134**	**127,352**	**73.2**	**46,600**	**26.8**	**173,952**
Consumer										
2024	1,371	52.2	1,254	47.8	2,625	26,641	50.3	26,283	49.7	52,924
2025	1,164	48.8	1,221	51.2	2,385	25,108	45.4	30,180	54.6	55,288
Subtotal	**2,535**	**50.6**	**2,475**	**49.4**	**5,010**	**51,749**	**47.8**	**56,463**	**52.2**	**108,213**
Total	**3,413**	**55.6**	**2,731**	**44.4**	**6,144**	**179,102**	**63.5**	**103,064**	**36.5**	**282,166**
Source: Credit Union Data										

Geographic Distribution

The geographic distribution of home mortgage loans and consumer loans reflects reasonable dispersion throughout the assessment area. The credit union's performance in lending in low- and moderate-income census tracts support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. In 2024, the credit union originated 2.3 percent of its home mortgage loans in low-income census tracts. This performance was below the aggregate performance of 6.4 percent and the percentage of owner-occupied housing units at 3.7 percent in low-income census tracts. In moderate-income census tracts, the credit union originated 11.3 percent of its home mortgage loans, which was below the aggregate performance of 18.9 percent and the percentage of owner-occupied housing units at 15.8 percent.

While the credit union's performance in 2024 was below the aggregate performance in low- and moderate-income census tracts, Market Share Data shows the credit union ranked 12th out of 262 lenders, suggesting high levels of competition within the assessment area. Furthermore, the top 10 institutions in 2024 were primarily large national institutions and non-depository mortgage companies, which held 37.7 percent market share in lending to low-and-moderate-income census tracts.

The following table illustrates the credit union's dispersion of home mortgage loans by census tract designation in the assessment area.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	3.7	6.4	11	2.3	1,648	2.5
2025	3.7	--	6	1.5	972	1.6
Moderate						
2024	15.8	18.9	54	11.3	6,419	9.8
2025	15.8	--	46	11.6	7,369	11.9
Middle						
2024	48.2	45.1	205	42.7	28,192	43.0
2025	48.2	--	187	47.0	25,527	41.3
Upper						
2024	32.2	29.3	210	43.8	29,242	44.6
2025	32.2	--	158	39.7	27,793	44.9
Not Available						
2024	0.1	0.3	0	0.0	0	0.0
2025	0.1	--	1	0.3	191	0.3
Total						
2024	**100.0**	**100.0**	**480**	**100.0**	**65,501**	**100.0**
2025	**100.0**	**--**	**398**	**100.0**	**61,852**	**100.0**
Source: 2020 ACS; Credit Union Data, 2024 HMDA Aggregate Data, "--" data not available.						

Consumer Loans

The geographic distribution of consumer loans reflects reasonable dispersion throughout the assessment area. The credit union's performance was slightly below demographics both years.

The following table illustrates the credit union's dispersion of consumer loans by census tract income designation in the assessment area.

Geographic Distribution of Consumer Loans					
Tract Income Level	**% of Households**	**#**	**%**	**$(000s)**	**%**
Low					
2024	13.7	110	8.0	1,992	7.5
2025	13.7	85	7.3	1,655	6.6
Moderate					
2024	20.3	259	18.9	4,552	17.1
2025	20.3	175	15.0	3,272	13.0
Middle					
2024	41.2	611	44.6	11,830	44.4
2025	41.2	547	47.0	11,666	46.5
Upper					
2024	24.2	387	28.2	8,204	30.8
2025	24.2	354	30.4	8,431	33.6
Not Available					
2024	0.7	4	0.3	64	0.2
2025	0.7	3	0.3	83	0.3
Total					
2024	**100.0**	**1,371**	**100.0**	**26,642**	**100.0**
2025	**100.0**	**1,164**	**100.0**	**25,108**	**100.0**
Source: 2020 ACS; Credit Union Data					

Borrower Profile

The distribution of home mortgage loans and consumer loans to individuals of different income levels is more than reasonable. The credit union's record of lending to low- and moderate-income borrowers supports this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including low - and moderate-income borrowers is more than reasonable. In 2024, the credit union originated 7.1 percent of its home mortgage loans to low-income borrowers, which was above the aggregate performance of 4.2 percent. The credit union also originated 19.8 percent of its home mortgage loans to moderate-income borrowers which was above the aggregate performance of 17.2 percent and the percentage of families at 17.3 percent. The credit union's performance in 2024 ranked 2nd out of 209 lenders in lending to low- and moderate-income borrowers based on market share reports.

In 2025, the credit union increased its lending to low-income borrowers at 8.3 percent. The credit union also increased its lending to moderate-income borrowers to 25.4 percent which was again above the percentage of moderate-income families in the assessment area.

The following table illustrates the credit union's home mortgage lending to borrowers of different income levels in the assessment area.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	25.2	4.2	34	7.1	2,051	3.1
2025	25.2	--	33	8.3	1,932	3.1
Moderate						
2024	17.3	17.2	95	19.8	9,007	13.8
2025	17.3	--	101	25.4	11,625	18.8
Middle						
2024	20.1	25.1	140	29.2	18,308	28.0
2025	20.1	--	110	27.6	16,604	26.8
Upper						
2024	37.3	36.2	203	42.3	32,930	50.3
2025	37.3	--	148	37.2	29,573	47.8
Not Available						
2024	0.0	17.3	8	1.7	3,205	4.9
2025	0.0	--	6	1.5	2,118	3.4
Total						
2024	**100.0**	**100.0**	**480**	**100.0**	**65,501**	**100.0**
2025	**100.0**	**--**	**398**	**100.0**	**61,852**	**100.0**
Source: 2020 ACS; Credit Union Data, 2024 HMDA Aggregate Data, "--" data not available.						

Consumer Loans

The distribution of consumer loans to individuals of different income levels, including low- and moderate-income borrowers is more than reasonable. The credit union's performance with low-income borrowers was above or in line with demographic data. The credit union's performance with moderate-income borrowers was roughly double the demographic.

The following table illustrates the credit union's consumer lending to borrowers of different income levels in the assessment area.

Distribution of Consumer Loans by Borrower Income Level					
Borrower Income Level	**% of Households**	**#**	**%**	**$(000s)**	**%**
Low					
2024	27.3	460	33.6	6,814	25.6
2025	27.3	414	25.6	6,823	27.2
Moderate					
2024	15.6	399	29.1	7,877	29.6
2025	15.6	328	28.2	7,427	29.6
Middle					
2024	16.7	287	20.9	6,218	23.3
2025	16.7	233	20.0	5,457	21.7
Upper					
2024	40.4	216	15.8	5,733	21.5
2025	40.4	184	15.8	5,402	21.5
Not Available					
2024	0.0	9	0.7	107	0.4
2025	0.0	5	0.4	68	0.3
Total					
2024	**100.0**	**1,371**	**100.0**	**26,642**	**100.0**
2025	**100.0**	**1,164**	**100.0**	**25,108**	**100.0**
Source: 2020 ACS; Credit Union Data					

Response to Complaints

The credit union did not receive any CRA-related complaints during the evaluation period; therefore, this criterion did not affect the credit union's Lending Test

Fair Lending Policies and Procedures

The Division of Banks provides comments regarding the institution's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. A review of the credit union's public comment file indicated the credit union received no complaints pertaining to the institution's CRA performance since the previous examination. The fair lending review was conducted in accordance with the Federal Financial Institutions Examination Council (FFIEC) Interagency Fair Lending Examination Procedures. Based on these procedures, no evidence of disparate treatment was noted.

Minority Application Flow

The credit union's HMDA LARs for 2024 and 2025 were reviewed to determine if the application flow from the different racial groups within the credit union's assessment area was reflective of the assessment area's demographics. Considering the demographic composition of the assessment area, comparisons to aggregate data in 2024, the credit union's minority application flow is reasonable.

According to the 2020 US Census Data, the credit union's assessment area contained a total population of 581,789 individuals of which 33.6 percent are minorities. The minority population represented is 8.2 percent Black/African American, 6.9 percent Asian, 0.2 percent American Indian, 15.3 percent Hispanic or Latino, and 6.3 percent other.

In 2024, the credit union received 671 HMDA reportable loan applications within its assessment area. Of these applications, 73 or 10.8 percent were received from minority applicants. The aggregate received 17.5 percent of its applications from minority consumers. For the same period, the credit union received 80 or 11.9 percent of all applications from ethnic groups of Hispanic origin within its assessment area. This was compared to an aggregate ethnic minority application rate of 13.1 percent.

In 2025, the credit union received 585 HMDA reportable loan applications within its assessment area. Of these applications, 72 or 12.3 percent were received from minority applicants. For the same period, the credit union received 49 or 8.4 percent of all applications from ethnic groups of Hispanic origin within its assessment area.

MINORITY APPLICATION FLOW					
RACE	**Credit Union 2024 HMDA**		**2024 Aggregate Data**	**Credit Union 2025 HMDA**	
	#	%	%	#	%
American Indian/ Alaska Native	3	0.5	0.4	0	0.0
Asian	19	2.8	7.4	14	2.4
Black/ African American	31	4.6	7.5	38	6.5
Hawaiian/Pacific Islander	1	0.2	0.1	1	0.2
2 or more Minority	4	0.6	0.2	6	1.0
Joint Race (White/Minority)	15	2.2	1.9	13	2.2
Total Racial Minority	**73**	**10.8**	**17.5**	**72**	**12.3**
White	570	85.0	58.3	458	78.3
Race Not Available	28	4.2	24.2	55	9.4
Total	**671**	**100.0**	**100.0**	**585**	**100.0**
ETHNICITY					
Hispanic or Latino	57	8.5	11.2	41	7.0
Joint (Hisp/Lat /Not Hisp/Lat)	23	3.4	1.9	8	1.4
Total Ethnic Minority	**80**	**11.9**	**13.1**	**49**	**8.4**
Not Hispanic or Latino	554	82.6	63.9	479	81.9
Ethnicity Not Available	37	5.5	23.0	57	9.7
Total	**671**	**100.0**	**100.0**	**585**	**100.0**
Source: 2020 US Census Data, HMDA Aggregate Data 2024, HMDA LAR Data 2024 and 2025					

The credit union's level of lending in 2024 was compared with that of the 2024 aggregate's lending performance. The credit union's level of lending in 2025 was analyzed for lending trends. The comparison of this data assists in deriving reasonable expectations for the rate of applications the credit union received from minority home mortgage loan applicants. Refer to the table below for information on the credit union's minority application flow as well as the aggregate lenders in the credit union's assessment area.

COMMUNITY DEVELOPMENT TEST

All One Credit Union demonstrated more than reasonable responsiveness to the assessment area's community development needs through community development services, qualified investments, and community development loans. Examiners considered the institution's capacity and the need and availability of such opportunities.

Community Development Loans

The credit union originated four community development loans totaling $1.7 million that met the needs of affordable housing, and economic development. The credit union primarily provided support for affordable housing to low- and moderate-income individuals or in low- or moderate-income areas. This reflects a decline from the prior examination where the credit union originated 10 loans totaling approximately $2.1 million.

The following table illustrates the credit union's community development lending activity.

Community Development Lending										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
3/13/23-12/31/23	0	0	0	0	0	0	0	0	**0**	**0**
2024	2	622	0	0	0	0	0	0	**2**	**622**
2025	1	550	0	0	1	515	0	0	**2**	**1,065**
YTD 2026	0	0	0	0	0	0	0	0	**0**	**0**
Total	**3**	**1,172**	**0**	**0**	**1**	**515**	**0**	**0**	**4**	**1,687**
Source: Credit Union Data										

The following are examples of the credit union's qualified community development loans.

- The credit union originated a $515,000 loan for the construction of a 6-unit commercial building in 2025. The building is located in Leominster and supports permanent job creation or retention to low-and moderate-income individuals. This loan qualifies for community development by supporting economic development in the community.

- The credit union originated a $550,000 loan to refinance and make improvements to a 5 unit multifamily in 2025. The multifamily is in Millbury and is likely to house primarily low- or moderate-income individuals. This loan qualifies for community development by supporting affordable housing.

Qualified Investments

All One Credit Union made 172 qualified investments totaling approximately $19.9 million, which include 79 qualified equity investments of $19.7 million and 93 donations totaling $143,925. Investment activity increased since the previous evaluation where the credit union made approximately $4.6 million in investments and donations. The dollar amount of qualified investments for this examination period equates to 2.2 percent of average total assets and 11.6 percent of average total securities.

The following table details qualified investments by year and purpose.

Qualified Investments										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000)'s**	**#**	**$(000)'s**	**#**	**$(000)'s**	**#**	**$(000)'s**	**#**	**$(000)'s**
3/14/2023-12/31/2023	0	0	14	3,496	0	0	0	0	**14**	**3,496**
2024	0	0	38	9,500	0	0	0	0	**38**	**9,500**
2025	0	0	22	5,500	0	0	0	0	**22**	**5,500**
YTD 2026	0	0	5	1,250	0	0	0	0	**5**	**1,250**
Subtotal	**0**	**0**	**79**	**19,746**	**0**	**0**	**0**	**0**	**79**	**19,746**
Qualified Grants & Donations	11	32	79	110	0	0	3	1	**93**	**143**
Total	**11**	**32**	**158**	**19,856**	**0**	**0**	**3**	**1**	**172**	**19,889**
Source: Credit Union Data										

Equity Investments

- The credit union purchased 79 new qualified equity investments, totaling approximately $19.7 million, all of which are in the form of Certificate of Deposits to Low-Income Designated Credit Unions (LICUs), Minority Owned Depository Institutions (MDIs), and Community Development Financial Institutions (CDFIs). Each individual investment totals $250,000 and carries a term of approximately one year or less. The investments are responsive and help meet the credit needs of the local communities in which the LICU, MDI and CDFI are chartered.

Charitable Contributions

The credit union made 93 donations totaling $143,925 during the evaluation period. The following are details of notable qualified donations.

- **Ginny's Helping Hands and Food Pantry** – Ginny's Helping Hand, Inc. is a nonprofit organization that supports low- and moderate-income individuals and families in North Central Massachusetts. The organization thrives to alleviate hunger, promote self-sufficiency, and enhance quality of life by offering access to food and clothing. Its food pantry and thrift store help provide essential household needs for individuals in need. This contribution primarily supports community service activities within the credit union's assessment area.

- **NewVue Communities** – This nonprofit organization supports North Central Massachusetts by expanding access to quality housing, promoting economic opportunity, and encouraging civic engagement. Serving 22 communities from Athol to Harvard, NewVue offers programs such as small business assistance, homeownership education, financial literacy training, and foreclosure prevention services. The contribution primarily supports affordable housing needs within the credit union's assessment area.

- **North Star Family Services** - This nonprofit organization provides housing and community services to families experiencing homelessness in North Central Massachusetts. In addition to providing permanent housing opportunities in Leominster, the organization offers emergency shelter, food assistance, case management, and financial education. This contribution primarily supports affordable housing within the credit union's assessment area.

- **Latin American Business Operation** – The Latin American Business Organization (LABO) is a nonprofit organization in Worcester that supports Latino entrepreneurs to start and grow small businesses. The organization provides business training, coaching, mentorship, and certification support in multiple languages. This organization is in a federally designated opportunity zone and promotes business activity and economic stability in these areas. This contribution primarily supports revitalization and stabilization within the community.

Community Development Services

During the evaluation period, credit union employees provided 267 instances of financial expertise or technical assistance to 34 community development organizations and directed financial education seminars and programs to children, youth, and adults. This performance has doubled since the prior examination, further showing All One Credit Union's commitment to meeting the needs of the assessment area.

The following table illustrates the community development services by year and purpose.

Community Development Services					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
3/13/2023-12/31-2023	2	8	0	0	**10**
2024	0	106	0	0	**106**
2025	1	138	0	2	**141**
YTD 2026	0	10	0	0	**10**
Total	**3**	**262**	**0**	**2**	**267**
Source: Credit Union Data					

The following are examples of community development services provided by the credit union and its staff.

Employee Involvement

Boys and Girls Club of Fitchburg/Leominster – The Boys and Girls Club provide social, educational, physical, and cultural programming for boys and girls in Fitchburg and Leominster with the intent to enhance the development of children and prepare young adults to be responsible and productive members of the community. The President & CEO's participation as a Board Member supports a community development purpose to low and moderate-income individuals in the assessment area.

Habitat for Humanity North Central Massachusetts – Habitat for Humanity provides affordable housing for low- and moderate-income families in the North Central Massachusetts Region. Programs include construction of new homes, critical repair of low-income housing, and the provision of used furniture and appliances. The credit union's SVP of Lending serves as a Board Member and Treasurer for the organization. This reflects a continuous commitment the institution provides in support of the region's affordable housing needs.

Financial Education

All One Credit Union is responsive to the financial education needs of the assessment area's low and moderate-income population and provides seminars to over 17 various schools and groups. Financial education programs are led by the credit union's AVP of Financial Education and Financial Education Specialist, and provide separate and tailored curriculums for children, high school students and adults as the needs differ amongst the groups. For children, the courses introduce the basics of budgeting, savings, and banking. For middle -school and high-school students, the courses focus on budgeting and savings, credit, and managing checking accounts. Adult classes focus on being a first-time homebuyer and anti-fraud awareness. As noted by the community contact, financial education is an assessment area need.

First Time Homebuyer Seminars – All One Credit Union recognized a need to support first time homebuyers throughout the examination process and held 10 virtual and two in person seminars over the evaluation period. These seminars detailed several flexible lending initiatives, particularly responsive to the needs of low- and moderate-income individuals.

Credit for Life Fairs at High Schools – All One Credit Union partnered with several high schools within the assessment area to provide financial education to students regarding housing, budgeting, and career income. A majority of students at these schools are low- or moderate-income. The goal is to help prepare students to make real personal financial decisions in the future, including career development and money management. Several credit union employees hosted and participated in the events.

Technical Assistance

Massachusetts Interest on Lawyers' Trust Accounts (IOLTA) – All One Credit Union participates in the Massachusetts IOLTA program. This program, mandated by the Supreme Judicial Court, requires lawyers and law firms to establish interest-bearing accounts for client deposits. The interest earned is used to fund law-related public service programs to help low-income clients. All One Credit Union was recognized as a "Leadership Institution" under this program and committed to raising funds at a higher interest rate to go beyond the standard eligibility requirements to provide legal aid. The credit union remitted $89,903 in IOLTA interest during the evaluation period.

Internship opportunities – The credit union provides internship and workforce development opportunities to students at the Clinton High School, Fitchburg High School, North High School, and UMASS Amherst. The students within these schools are primarily low-and moderate-income individuals. During the examination period, nine high school students participated in an internship.

INTERMEDIATE SMALL INSTITUTION PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

1) The institution's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
2) The percentage of loans, and as appropriate, other lending-related activities located in the institution's assessment area(s);
3) The geographic distribution of the institution's loans;
4) The institution's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
5) The institution's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

1) The number and amount of community development loans;
2) The number and amount of qualified investments;
3) The extent to which the institution provides community development services; and
4) The institution's responsiveness through such activities to the area's community development needs considering the amount and combination of these activities, along with their qualitative aspects.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, require all financial institution to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

1) Make its most current CRA performance evaluation available to the public;

2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;

3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

   "You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks, at (20 Adams Street Leominster, Massachusetts 01453)."

   [Please Note: If the institution has more than one assessment area, each office (other than off-premises electronic deposit facilities) in that community shall also include the address of the designated office for that assessment area.]

4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by its supervisory agency, may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five-year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A **geographic area or field of membership** delineated by the credit union under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family. Other family is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

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.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.