PUBLIC DISCLOSURE

February 2, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Brookline Municipal Credit Union
Certificate Number: 67340

334 Washington Street
Brookline, MA 02447-0776

Division of Banks
One Federal Street, Suite 701
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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This document is an evaluation of the Community Reinvestment Act (CRA) performance of Brookline Municipal Credit Union (credit union) prepared by the Massachusetts Division of Banks (Division), the institution's supervisory agency as of February 2, 2026. The Division rates the CRA performance of an institution consistent with the provisions set forth in Massachusetts Regulation 209 CMR 46.00.

INSTITUTION RATING

INSTITUTION'S CRA RATING: This credit union 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 credit union's performance is summarized below:

LENDING TEST:

- The loan-to-share ratio (LTS) is reasonable given the institution's size, financial condition, and assessment area credit needs.
- The distribution of borrowers reflects reasonable penetration of loans among individuals of different income levels.
- The credit union did not receive any CRA-related complaints since the previous evaluation. The credit union has an adequate record relative to its fair lending policies and procedures.

SCOPE OF EVALUATION

General Information

The CRA requires the Division to use its authority when examining financial institutions subject to their supervision to assess the institution's record of meeting the needs of its assessment area, consistent with safe and sound operation of the institution.

This evaluation covers the period from the prior evaluation dated February 22, 2022, to the current evaluation dated February 2, 2026. The majority of data analyzed was from 2024 and 2025. Small Institution CRA procedures were used for the evaluation, which include three criteria within the Lending Test:

- Loan-to-Share (LTS) ratio
- Borrower Profile
- Response to CRA-related Complaints and Fair Lending

Since the credit union has defined its membership as its assessment area, as opposed to a geographic area, an evaluation of credit extended within a defined geographic area was not conducted.

Activities Reviewed

The credit union's primary lending activity by origination is consumer loans. For the borrower profile criterion, examiners selected a random sample of consumer loans from 2024 and 2025. Examiners also analyzed home mortgage loans originated in 2024 and 2025 due to home mortgage loans representing the majority of the loan portfolio. Credit union data reflects the December 31, 2025 NCUA 5300 Quarterly Call Report. The evaluation references demographic and economic data from the 2020 U.S. Census.

While number and dollar volume of loans are presented, examiners emphasized performance by number of loans because the number of loans is a better indicator of the number of individuals served.

DESCRIPTION OF INSTITUTION

Background

Brookline Municipal Credit Union is a state-chartered credit union founded in 1939. Its membership is limited to those who are employees or retired employees of the Town of Brookline, any person who lives or works in the Town of Brookline or has retired from employment in the Town of Brookline, and members of the families of all such persons. As of December 31, 2025, the credit union has 2,490 members.

The credit union was last examined by the Division of Banks on February 22, 2022 and earned a CRA rating of Satisfactory.

Operations

The credit union maintains one office located at 334 Washington Street in Brookline, MA and its operating hours are from 8:30 AM to 4:00 PM on Monday through Friday. The credit union maintains one ATM, which is located at its office and allows 24-hour access to members. The credit union is part of both the SUM and MoneyPass networks, which offer members access to ATMs nationwide without incurring a surcharge.

The credit union offers checking accounts with debit cards, share savings, money market, and club accounts, certificates of deposit, and IRA accounts. Loan products include real estate, vehicle and personal loans, and personal credit cards.

Ability and Capacity

As of December 31, 2025, the credit union had total assets of approximately $49.0 million, total shares and deposits of approximately $42.4 million, and total loans of approximately $14.3 million. Since the previous evaluation, assets have increased by 5.1 percent, shares and deposits by 3.7 percent, and total loans by 31.2 percent.

The credit union's loan portfolio is comprised primarily of loans or lines of credit secured by a first lien on 1-to-4 family residential properties, which accounts for 49.9 percent of all loans. The following table provides additional details regarding the credit union's loan portfolio.

Loan Portfolio Distribution as of 12/31/2025		
Loan Category	**$**	**%**
Unsecured Loans/Lines of Credit	563,534	3.9
New Vehicle Loans	1,679,340	11.7
Used Vehicle Loans	1,474,417	10.3
All other Secured Non-Real Estate Loans/Lines of Credit	12,847	0.1
Loans/Lines of Credit Secured by a First Lien on a single 1-to-4 Family Residential Property	7,242,488	50.6
Loans/Lines of Credit Secured by a Second Lien on a single 1-to-4 Family Residential Property	3,330,920	23.3
Total Loans	**14,303,546**	**100.0**
Source: NCUA Reports of Condition and Income, 12/31/2025		

DESCRIPTION OF ASSESSMENT AREA

Since the credit union's focus of service is on its membership and not a specific geographic area, the credit union has delineated its membership as its assessment area. This is in accordance with regulation 209 CMR 46.41(8), which states that a credit union whose membership by-law provisions are not based upon geography is permitted to designate its membership as its assessment area.

The Federal Financial Institutions Examination Council (FFIEC) updated median family income level is used to analyze home loans under the Borrower Profile criterion. The following table presents low-, moderate-, middle-, and upper-income categories for the Boston, MA Metropolitan Division, within which the credit union is located.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
Boston, MA Median Family Income (14454)				
2024 ($136,200)	<$68,100	$68,100 to <$108,960	$108,960 to <$163,440	≥$163,440
2025 ($150,200)	<$75,100	$75,100 to <$120,160	$120,160 to <$180,240	≥$180,240
Source: FFIEC				

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information assists examiners in determining whether local financial institutions are responsive to the needs of the assessment area. Examiners contacted a representative from a community organization that serves the greater Boston area for context on the needs of the geographic area within which the credit union is located.

The contact's organization primarily focuses on affordable housing and economic development initiatives. The contact noted that Boston and surrounding neighborhoods face a challenge in providing affordable housing for low- and moderate-income individuals, as well as maintaining and cultivating an environment for small and startup businesses. The contact noted that capital access and flexible lending is the greatest need for both first-time home buyers and small businesses. The contact also mentioned financial literacy as an important resource for individuals and businesses and hopes to see more neighborhood involvement in these initiatives.

Credit Needs

Examiners determined that the primary credit needs are housing and consumer loans for borrowers in a relatively expensive area.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

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

Loan-to-Share Ratio

This performance criteria determines what percentage of the credit union's share base is reinvested in the form of loans and evaluates its appropriateness. The average net loan-to-share (LTS) ratio for the last eight quarters is reasonable given the institution's size, financial condition, and its membership credit needs.

The credit union's net LTS ratio averaged 35.0 percent over the past eight calendar quarters from March 31, 2024, to December 31, 2025, which was an increase from the last examination's average of 27.3 percent. The credit union increased their loan volume through highlighting home equity and automobile lending products that offered benefits to its members. The increase in loan volume began in 2023 and plateaued in 2024, as rates increased. The corresponding deposit rates rose during this time period, increasing the interest in Certificate of Deposit products and a growth in membership shares. The LTS ratio remained somewhat steady during the most recent quarters, ranging from 36.7 percent on June 30, 2024, to 33.0 percent on June 30, 2025.

The credit union's average LTS ratio over the last eight quarters was also compared to that of two similarly situated institutions. The institutions were selected based on institutional purpose, geographic location, and lending focus. The table below highlights Brookline Municipal Credit Union's average LTS ratio when compared to those institutions.

Loan-to-Share Ratio Comparison		
Institution	Total Assets as of 12/31/2025 ($000s)	Average Net LTS Ratio (%)
Brookline Municipal Credit Union	**49,019,078**	**35.0**
Billerica Municipal Credit Union	23,966,454	38.3
Watertown Municipal Credit Union	9,759,481	49.6
Source: Reports of Condition and Income – 12/31/2023 - 12/31/2025		

Borrower Profile

The distribution of borrowers among sampled consumer loans reflects reasonable penetration among borrowers of different income levels. Examiners focused on lending to low- and moderate-income borrowers. In 2024, one of the sampled loans was to a low-income borrower while six were to moderate-income borrowers. In 2025, the sampled loans showed no loans to low-income borrowers while there were nine to moderate-income borrowers. Based on the sample of loans, the credit union's percentage was above the moderate-income households in the Boston Metropolitan Division (MD) (approximately 14.2 percent), where the majority of loans are located. Please see the table below for more information.

Distribution of Consumer Loans by Borrower Income Level Assessment Area: Brookline MCU 2026				
Borrower Income Level	**#**	**%**	**$(000s)**	**%**
Low				
2024	1	3.3	14,730	2.4
2025	0	0.0	0	0.0
Moderate				
2024	6	20.0	98,503	16.4
2025	9	30.0	61,881	14.8
Middle				
2024	9	30.0	170,978	28.4
2025	13	43.3	236,607	56.5
Upper				
2024	14	46.7	317,887	52.8
2025	8	26.7	120,297	28.7
Total				
2024	**30**	**100.0**	**601,738**	**100.0**
2025	**30**	**100.0**	**418,785**	**100.0**
Source: 2020 ACS; credit union data				

The credit union made 13 home mortgage loans for approximately $1.1 million in 2024 and nine loans for approximately $1.3 million in 2025. In 2024, no loans were made to low-income borrowers, and six loans approximately 46.2 percent were made to moderate-income borrowers. No home mortgage loans were made to low- or moderate-income borrowers in 2025.

The credit union's membership is restricted to residents and employees of the Town of Brookline, which provides context for the lending performance. Brookline has a median family income of $175,387 (compared to the Boston MD median family income of $150,200) and has an average home value of $1.0 million (compared to the Boston MD home value of $525,310).

Response to Complaints and Fair Lending Policies and Practices

The credit union has not received any CRA-related complaints since the last CRA evaluation; therefore, this criterion did not affect the CRA rating.

The Division of Banks provides comments regarding the institution's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. Examiners conducted the fair lending review in accordance with the FFIEC Interagency Fair Lending Examination Procedures. The credit union has an adequate record relative to its fair lending policies and procedures.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners reviewed the credit union's compliance with the laws related to discrimination and other illegal credit practices, including the Fair Housing Act and the Equal Credit Opportunity Act, and did not identify any discriminatory or other illegal credit practices.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, require all financial institutions 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 334 Washington Street, Brookline, MA 02447-0776"

   [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 the Massachusetts Division of Banks, 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 delineated by the institution 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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.
Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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.

Rated Area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

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.

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.