

PUBLIC DISCLOSURE

May 19, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First County Bank
Certificate Number: 18204

117 Prospect Street
Stamford, Connecticut 06901

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
New York Regional Office

350 Fifth Avenue, Suite 1200
New York, New York 10118

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 federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

INSTITUTION RATING	1
DESCRIPTION OF INSTITUTION	3
DESCRIPTION OF ASSESSMENT AREA	4
SCOPE OF EVALUATION.....	9
CONCLUSIONS ON PERFORMANCE CRITERIA.....	10
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	25
APPENDICES	26
LARGE BANK PERFORMANCE CRITERIA	26
GLOSSARY	28

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.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

The Lending Test is rated High Satisfactory.

- Lending levels reflect adequate responsiveness to assessment area credit needs.
- The institution made a high percentage of loans are made in the assessment area.
- The geographic distribution of loans reflects excellent penetration throughout the assessment area.
- The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes.
- The institution uses innovative and/or flexible lending practices in order to serve assessment area credit needs.
- The institution has made a relatively high level of community development loans.

The Investment Test is rated High Satisfactory.

- The institution has a significant level of qualified community development investments and grants, occasionally in a leadership position.
- The institution exhibits good responsiveness to credit and community development needs.
- The institution rarely uses innovative and/or complex investments to support community development initiatives.

The Service Test is rated High Satisfactory.

- Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area.
- To the extent changes have been made, the bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
- Services and business hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals.
- The institution provides a relatively high level of community development services.

DESCRIPTION OF INSTITUTION

Background

First County Bank (FCB) is a state chartered mutual financial institution headquartered in Stamford, Connecticut. FCB does not have affiliates that offer retail banking services. The bank continues to operate the First County Bank Foundation, Inc., which is a 501(c) charitable foundation that awards grants to local non-profit organizations.

At the previous FDIC CRA Performance Evaluation dated November 15, 2021, FCB received a Satisfactory rating based on the Federal Financial Institutions Examination Council's (FFIEC) Interagency Large Institution CRA Examination Procedures.

Operations

Including its main office in Stamford, the bank operates 13 full-service branches throughout the Western Connecticut Planning Region (PR) and Greater Bridgeport PR. The branches are in the following cities: Stamford (6), Norwalk (2), New Canaan (1), Greenwich (1), Westport (1), Fairfield (1), and Darien (1). Each branch offers a 24-hour automated teller machine (ATM). In addition, the bank operates one non-deposit-taking ATM in Stamford. Since the prior evaluation, the bank closed three full-service branches and the three corresponding ATMs in Stamford (2) and Norwalk (1). The bank did not open any branches or ATMs or engage in any merger or acquisition activities since the prior evaluation.

FCB offers home mortgage, commercial, and consumer loans, with a primary focus on residential lending. The bank offers a variety of deposit services including checking, savings, and money market deposit accounts, certificates of deposit, and individual retirement accounts. The bank also offers wealth management services. In addition to the bank's 14 ATMs, other alternative delivery services include internet and mobile banking, telephone banking, electronic bill pay, and remote deposit capture.

Ability and Capacity

As of March 31, 2025, the bank's assets totaled \$2.3 billion, which included total loans of \$1.7 billion and total securities of \$319.8 million. The bank also reported \$1.8 billion in total deposits. Residential mortgage loans, including one-to-four family and multi-family loans, accounted for the largest portion of the bank's loan portfolio, followed by loans secured by nonfarm nonresidential properties. The following table illustrates the loan portfolio distribution.

Loan Portfolio Distribution as of 3/31/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	122,490	7.1
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	746,493	43.6
Secured by Multifamily (5 or more) Residential Properties	180,629	10.5
Secured by Nonfarm Nonresidential Properties	563,368	32.9
Total Real Estate Loans	1,612,980	94.1
Commercial and Industrial Loans	87,865	5.1
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	12,887	0.8
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	94	>0.1
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	1,713,826	100.0
<i>Source: Report of Condition and Income; Due to rounding, totals may not equal 100%.</i>		

Examiners did not identify any financial, legal, or other impediments that affected the bank’s ability to meet the credit needs of the assessment area.

DESCRIPTION OF ASSESSMENT AREA

Examiners conducted a full-scope review of the bank’s performance in the Bridgeport-Stamford-Danbury, CT Metropolitan Statistical Area (MSA), which contains the bank’s only assessment area. The assessment area includes a portion of the Western Connecticut Planning Region (PR) and Greater Bridgeport PR. Specifically, the assessment area encompasses the cities and towns of Darien, Greenwich, New Caanan, Norwalk, Stamford, Weston, Westport, and Wilton in the Western Connecticut PR, and Bridgeport and Fairfield in the Greater Bridgeport PR.

On July 21, 2023, the Office of Management and Budget (OMB) established revised delineations of the nation’s MSAs, Micropolitan Statistical Areas, and Combined Statistical Areas through OMB Bulletin 23-01. The revised delineations reflect the State of Connecticut’s change from using counties as the geographic components of MSAs to using planning regions (county equivalents) as the geographic components of MSAs. Examiners referred to these revised delineations for this evaluation. Although the assessment area cities and towns have not changed, the prior assessment area included a portion of Fairfield County in the Bridgeport-Stamford-Norwalk, CT MSA.

The assessment area contains 15 Opportunity Zones in the cities of Bridgeport (7), Stamford (5), and Norwalk (3). Opportunity Zones are distressed communities designated by the state and certified by the U.S. Treasury Department. The federal Opportunity Zones program offers tax incentives to the public and private stakeholders to facilitate private economic development, job creation, and growth in low- or moderate-income census tracts.

Economic and Demographic Data

According to the 2020 U.S. Census data, the assessment area encompasses 148 census tracts. The 148 census tracts have the following income designations:

- 29 low-income census tracts,
- 32 moderate-income census tracts,
- 22 middle-income census tracts,
- 64 upper-income census tracts, and
- 1 census tract with no income designation.

The highest concentration of low- and moderate- income tracts are in Bridgeport, (23 low- and 12 moderate-income tracts), Stamford (5 low- and 11 moderate-income tracts), and Norwalk (1 low- and 8 moderate-income tracts). Greenwich has one moderate-income tract.

The 2020 U.S. Census changes resulted in an increase of 10 tracts in the assessment area and some changes to tract income classifications. The changes reflect an increase of 1 low-income tract, 4 moderate-income tracts, 6 upper-income tracts, and 1 tract with no income designation, as well as a decrease of 2 middle-income tracts.

The following table illustrates demographic information 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)	148	18.9	21.6	14.2	44.6	0.7
Population by Geography	598,457	16.6	25.7	13.3	44.1	0.3
Housing Units by Geography	233,774	16.8	26.4	14.2	42.3	0.3
Owner-Occupied Units by Geography	128,599	7.4	20.4	13.9	58.2	0.1
Occupied Rental Units by Geography	85,294	30.0	35.0	15.0	19.4	0.7
Vacant Units by Geography	19,881	21.0	27.7	12.4	38.4	0.5
Businesses by Geography	106,251	11.2	22.4	13.0	53.2	0.2
Farms by Geography	502	5.2	11.0	6.0	77.9	0.0
Family Distribution by Income Level	145,286	27.6	13.7	14.9	43.8	0.0
Household Distribution by Income Level	213,893	28.5	14.7	13.9	43.0	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$119,192	Median Housing Value		\$ 599,550	
			Median Gross Rent		\$1,640	
			Families Below Poverty Level		7.7%	
<i>Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

The Geographic Distribution criterion compares the bank's home mortgage loans to the distribution of owner-occupied housing units. The number of owner-occupied housing units in each tract income category reflects the level of opportunities for home mortgage lending in those tracts. As

shown in the previous table, with low-income geographies containing only 7.4 percent of the area’s owner-occupied housing units, lenders may have limited opportunities to make owner-occupied home mortgage loans in these geographies.

Examiners use FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table shows the median family income ranges in the assessment area for 2021, 2022, 2023, and 2024.

Median Family Income Ranges					
Year	Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
Bridgeport-Stamford-Danbury, CT MSA					
2021	\$ 121,100	<\$60,550	\$60,550 to < \$ 96,880	\$96,880 to < \$145,320	>= \$145,320
2022	\$ 135,900	<\$67,950	\$67,950 to < \$108,720	\$108,720 to < \$163,080	>= \$163,080
2023	\$ 142,800	< \$71,400	\$71,400 to < \$114,240	\$114,240 to < \$171,360	>= \$171,360
2024	\$ 146,500	< \$73,250	\$73,250 to < \$117,200	\$117,200 to < \$175,800	>= \$175,800
<i>Source: FFIEC</i>					

The median housing value is five times the median family income in the assessment area, indicating home affordability challenges. Low-income families represent 27.6 percent of all families in the assessment area, and 27.8 percent of these families have incomes below the poverty line. Families in this category likely face challenges qualifying for traditional home mortgage loans, especially when considering the high median housing value and maximum income of low-income families of \$73,250.

According to the 2024 D&B data, 106,753 non-farm businesses operate in the assessment area. The following reflects the gross annual revenues (GARs) for these businesses.

- 91.1 percent have \$1.0 million or less,
- 2.9 percent have more than 1.0 million.
- 6.0 percent have unknown revenues.

Non-classifiable establishments represent the greatest percentage of businesses in the assessment area at 26.5 percent, followed by professional, scientific, and technical services at 12.6 percent, and construction at 8.4 percent. In addition, 65.3 percent of area businesses have four or fewer employees, and 95.0 percent operate from a single location.

According to the U.S. Bureau of Labor Statistics, unemployment rates show a clear downward trend, reflecting steady economic recovery during the evaluation period. Most areas experienced significant decreases in the unemployment rate from 2021 to 2022 and then rates were more stable through 2024. While the national average saw a slight uptick in 2024, the regional rates in Connecticut remained steady, suggesting stronger local labor market compared to the national trend. The following table shows unemployment rates for 2021, 2022, 2023, and 2024 at the PR, state, and national levels.

Unemployment Rates				
Area	2021	2022	2023	2024
	%	%	%	%
Greater Bridgeport Planning Region	7.4	4.5	3.6	3.6
Western Connecticut Planning Region	5.3	3.5	2.8	2.8
Bridgeport-Stamford-Danbury, CT MSA	6.0	3.8	3.1	3.1
Connecticut	6.5	4.1	3.2	3.2
National Average	5.3	3.6	3.6	4.0

Source: Bureau of Labor Statistics

According to Moody’s Analytics, the Bridgeport-Stamford-Danbury, CT MSA is considered a global financial center as of April 2025. The area’s economic strengths include a highly educated labor force, above-average exposure to high tech, and close proximity to New York City. Economic weaknesses in the area include weak migration trends, income disparities, and high costs, including housing and office rents. The top employers in the area include Sikorsky Aircraft Corp., Boehringer Ingelheim Corp., and ASML US INC.

Competition

FCB operates in a highly competitive market for banking services. According to June 30, 2024 FDIC deposit market share data, there were 25 financial institutions operating 177 branches in the assessment area. FCB had a 3.1 percent deposit market share, ranking 8th among all institutions. The top five institutions with the highest deposit market share were Webster Bank, NA.; Bank of America, NA.; Manufacturers and Traders Trust Company; JPMorgan Chase Bank, NA.; and Wells Fargo Bank, NA, with a combined market share of 77.4 percent.

The bank also faces a high level of competition for home mortgages from national lenders, mortgage companies, credit unions, and community banks. In 2021, aggregate home mortgage lending data showed 483 lenders originated or purchased 28,734 home mortgage loans in the assessment area. The top five lenders, JPMorgan Chase Bank, N.A.; Rocket Mortgage; Citizens Bank, N.A.; Wells Fargo Bank, N.A.; and Bank of America, N.A., all of which are large national banks or mortgage companies, with a combined market share of 26.1 percent. In 2022, 428 lenders originated or purchased 15,778 loans, which reflects a decreased in lending activity in the assessment area. The top five lenders were Citizens Bank, N.A.; Bank of America, N.A.; JPMorgan Chase Bank N.A.; Wells Fargo Bank, N.A.; and U.S. Bank, N.A., with a combined market share of 25.1 percent. In 2023, activity continued to decline, as 360 lenders originated or purchased 10,610 home mortgage loans in the assessment area. This declining trend from 2021 to 2023 reflects the market’s response to the post-pandemic economic conditions, including rising interest rates and increased home values driven by a decrease in available housing inventory. In 2023, FCB ranked 32nd with a market share of 0.6 percent. Lenders that ranked higher were primarily large national lenders. The top five lenders were JPMorgan Chase Bank, N.A.; Citizens Bank, N.A.; Bank of America, N.A.; U.S. Bank, N.A.; and Manufacturers and Traders Trust Company with a combined market share of 36.8 percent. In 2024, FCB ranked 51st with a market share of 0.3 percent. Lenders that ranked higher were primarily large national lenders. The top five lenders were Citizens Bank,

N.A.; U.S. Bank, N.A.; Bank of America, N.A.; Manufacturers and Traders Trust Company and JPMorgan Chase Bank, N.A. with a combined market share of 27.6 percent. With such a significant share of loans originated or purchased by the top five lenders, substantial competition existed for remaining loans among 355 other lenders in 2023 and 361 lenders in 2024.

The bank also faces a high level of competition for small business loans. According to 2023 CRA aggregate data, 144 lenders reported originating or purchasing 34,748 small business loans in the assessment area. FCB ranked 43rd with a market share of 0.1 percent. The top five lenders were national lenders, including American Express National Bank; JPMorgan Chase Bank, N.A.; Citibank, N.A.; Bank of America, N.A.; and Capital One, N.A. with a combined market share of 76.9 percent. Even more so than home mortgage lending, the top lenders account for a substantial portion of small business lending, resulting in notable competition among smaller lenders.

Community Contact

As part of the evaluation process, examiners contact third parties who are active in the assessment area to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows available credit and community development opportunities.

Examiners contacted a representative from an economic development organization that operates in the assessment area. The contact provides small business assistance and supports financial literacy for new and existing small businesses in Stamford and collaborates with partners that offer free advising and business financial planning workshops. The contact highlighted that Stamford is a primary hub for businesses due to its proximity to New York City. The city has a robust small business community, an abundance of mid-size companies, and is home to four existing Fortune 500 businesses. In addition to a high demand for small business assistance, the contact noted that affordable housing, specifically home ownership, is a significant community development need. The contact mentioned that office spaces in downtown Stamford are currently being converted into residential units to support affordable housing needs in the city.

Examiners also reviewed an existing community contact from a housing authority that serves the bank's assessment area. The organization provides affordable housing opportunities for low- and moderate- income individuals in Stamford. The contact described a shortage of affordable housing, demonstrated by long waitlists for affordable rental units. The contact emphasized that the greatest challenge in developing additional affordable housing is the shortage of available land in the area. The land shortage creates strong competition among private developers who can afford to pay above market prices for any available land. The contact mentioned that financial institutions can assist affordable housing organizations by providing flexible financing packages, including lower interest rates and longer repayment terms, to competitively bid for buildable land.

Credit and Community Development Needs and Opportunities

Considering the information from community contacts, discussions with bank management and demographic and economic information, examiners determined that the primary community

development needs in the assessment area are affordable housing for low- and moderate-income individuals, as well as support services, including financial literacy, for small businesses and low- and moderate-income individuals. Furthermore, there are needs for infrastructure improvements in the low- and moderate-income areas of Bridgeport, Stamford, and Norwalk due to concentrations of poverty and long-term underinvestment in these areas.

Examiners determined that the primary credit needs are home mortgage and small business loans, including flexible loans to support small and start-up businesses, and accessible financing to support economic development activities. Opportunities exist for financial institutions to originate flexible small business loans to meet the needs of small businesses, and to create flexible and creative financing for affordable housing projects benefiting low- and moderate-income individuals. Institutions can further support community development by offering financial literacy programs that provide low- and moderate- income individuals with tools and knowledge to manage finances, build credit, and plan for homeownership. Additionally, the high levels of low- and moderate-income tracts present opportunities for financial institutions to support revitalization and stabilization through partnerships with local organizations to fund infrastructure and workforce development initiatives in these areas.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation, dated November 15, 2021, through the current evaluation dated May 19, 2025. Examiners used the FFIEC Interagency Large Institution CRA Examination Procedures, which included the following performance tests: Lending Test, Investment Test, and Service Test (see Appendices for a complete description). Examiners used full-scope procedures to evaluate the bank's CRA performance in its assessment area.

Activities Reviewed

Examiners determined that the bank's major product lines are home mortgage and small business loans. This conclusion considered the bank's business strategy, and the number and dollar volume of loans originated during the evaluation period. The bank originated a minimal number of consumer loans and did not originate any small farm loans during the evaluation period; therefore, the evaluation does not include an analysis of these products.

Examiners analyzed all originated and purchased home mortgage loans reported on the bank's Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs) for 2021, 2022, 2023, and 2024. The bank reported 429 loans totaling \$247.7 million in 2021, 394 loans totaling \$287.6 million in 2022, 85 loans totaling \$115.7 million in 2023, and 55 loans totaling \$64.7 million in 2024. Examiners compared the bank's 2021, 2022, 2023, and 2024 home mortgage lending performance against demographic and aggregate lending data.

Examiners also analyzed all small business loans reported on the bank's 2021, 2022, 2023, and 2024 Small Business Registers. The bank reported 928 loans totaling \$92.3 million in 2021, 76

loans totaling \$27.6 million in 2022, 45 loans totaling \$19.3 million in 2023, and 80 loans totaling \$21.0 million in 2024. Aggregate data and D&B demographic data provided a standard of comparison for small business loans in 2021, 2022, and 2023. For 2024, examiners compared the bank's performance only to demographic data as aggregate data was not yet available.

Under the Assessment Area Concentration criterion, examiners presented data from 2021, 2022, 2023, and 2024, which represents all full calendar years since the prior evaluation. Under the Geographic Distribution and Borrower Profile criteria, examiners only presented 2023 and 2024 data for home mortgage and small business lending, as 2024 represents the most recent year with aggregate data and 2023 provides for trend analysis. Bank performance in 2023 and 2024 is representative of its performance throughout the entire evaluation period.

When determining Lending Test conclusions and ratings, examiners gave greater weight to home mortgage lending. Examiners weighed the number of originations more heavily than the dollar volume, as the number of loans better indicates the total number of individuals and businesses served. While the bank originated a significant number of small business loans in 2021 due to the origination of U.S. Small Business Administration (SBA) Paycheck Protection program (PPP) loans, the bank originated a higher volume of home mortgage loans compared to small business loans between 2022 to 2024, which is consistent with the bank's historical activity levels.

Examiners also reviewed the bank's community development loans, investments, and services, as well as innovative and/or flexible lending practices, for the period from the previous evaluation date to the current evaluation date. Qualified investments included new investments and grants and outstanding qualified investments from prior evaluation periods. Under the Service Test, examiners reviewed the bank's branch network, alternative delivery systems, and any impact of branch openings or closings since the prior evaluation. Examiners also reviewed retail banking products or services targeted to low- and moderate-income individuals or small businesses.

Examiners obtained demographic and economic information referenced in the evaluation from the 2020 U.S. Census, 2015 American Community Survey (ACS), D&B, Moody's Analytics, and U.S. Bureau of Labor Statistics. Examiners also obtained the bank's financial data from the March 31, 2025, Call Report.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Lending Test rating is High Satisfactory. The bank's performance under the Geographic Distribution, Assessment Area Concentration, Product Innovation, and Community Development Lending criteria primarily support this conclusion.

Lending Activity

FCB's lending activity levels reflect adequate responsiveness to assessment area credit needs considering performance context, economic environment, and competition.

Home Mortgage Lending

From 2021 through 2024, the bank originated or purchased 700 home mortgage loans totaling \$489.1 million in the assessment area. Specifically, the bank originated or purchased 356 home mortgage loans totaling \$216.3 million in 2021, 250 loans totaling \$166.9 million in 2022, 62 loans totaling 66.8 million in 2023, and 32 loans totaling \$39.1 million in 2024. The decline in home mortgage loan originations during the evaluation period aligns with broader market trends, driven by rising interest rates and low housing inventory, both of which reduced demand for home purchases and refinancing activity. Between the years 2021 and 2023, the home mortgage market in the assessment area saw a significant contraction in both loan volume and lender participation. Specifically, the number of originating lenders declined by over 25.0 percent, while loan originations dropped by more than 60.0 percent. As indicated in the Competition section of the Description of the Assessment Area section, market share became increasingly concentrated among a few large, national lenders, further limiting local competition. In 2023, FCB ranked 32nd out of 360 lenders in the assessment area with a market share of 0.6 percent. Similarly situated institutions such as Fairfield County Bank and Union Savings Bank ranked 22nd and 29th respectively.

Small Business Lending

From 2021 through 2024, FCB originated 1,009 small business loans totaling \$139.7 million in the assessment area. The bank originated or purchased 822 small business loans totaling \$77.8 million in 2021, 67 loans totaling \$25.1 million in 2022, 41 loans totaling \$16.7 million in 2023, and 79 loans totaling \$20.2 million in 2024. Small business lending declined significantly since 2021, following the end of the SBA PPP. While lending volume increased modestly in 2024, the bank made most of these loans to businesses with gross annual revenues over 1.0 million. Similar to home mortgage lending, the overall decline in CRA-eligible small business lending is reflective of broader market challenges, as rising interest rates and economic pressures reduced credit demand among smaller businesses. In 2023, the bank ranked 43rd out of 144 lenders in the assessment area with a market share of 0.1 percent. The bank's market ranking was behind Union Savings Bank (20th) and Fairfield County Bank (39th) and was ahead of Bankwell Bank (46th).

Assessment Area Concentration

FCB made a high percentage of home mortgage and small business loans within its assessment area. During the review period, the bank originated 81.7 percent of home mortgage and small business loans by number, and 71.8 percent by dollar volume inside the assessment area. Overall, the ratio of loans inside the assessment area to loans outside of the assessment area fluctuated throughout the evaluation period. Notably, the bank made 98.8 percent of small business loans by number and 96.0 percent by dollar amount inside the assessment area in 2024.

The following table illustrates the bank's home mortgage and small business lending inside and outside of the assessment area by loan category and year.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$(000s)	%	\$(000s)	%	
Home Mortgage										
2021	356	83.0	73	17.0	429	216,310	87.3	31,375	12.7	247,685
2022	250	63.5	144	36.5	394	166,930	58.1	120,620	41.9	287,550
2023	62	72.9	23	27.1	85	66,760	57.7	48,955	42.3	115,715
2024	32	58.2	23	41.8	55	39,100	60.4	25,615	39.6	64,715
Subtotal	700	72.9	263	27.1	963	489,100	68.4	226,565	31.6	715,665
Small Business										
2021	822	88.6	106	11.4	928	77,771	84.3	14,523	15.7	92,294
2022	67	88.2	9	11.8	76	25,077	90.9	2,517	9.1	27,594
2023	41	91.1	4	8.9	45	16,671	86.5	2,605	13.5	19,276
2024	79	98.8	1	1.2	80	20,182	96.0	845	4.0	21,027
Subtotal	1,009	89.4	120	10.6	1,129	139,701	87.2	20,490	12.79	160,191
Total	1,709	81.7	383	18.3	2,092	628,80	71.8	247,055	28.2	875,856
<i>Source: HMDA Reported Data; CRA Reported Data</i>										

Geographic Distribution

The geographic distribution of loans reflects excellent penetration throughout the assessment area, particularly in low- and moderate-income geographies. The bank's excellent performance in both home mortgage and small business lending supports this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent penetration throughout the assessment area, particularly in low- and moderate-income geographies.

The bank's 2023 lending performance in low-income geographies exceeded the aggregate performance by 8.7 percentage points. The lending performance also exceeded the percentage of occupied housing units by 8.4 percentage points. In 2024, the bank originated a lower number of mortgages in low-income areas. However, the bank's lending performance remained above the aggregate and housing demographic data.

The bank's lending activity in moderate-income geographies reflected a positive trend during the evaluation period. In 2023, the bank's performance slightly exceeded the aggregate performance and demographic data in moderate-income geographies. The bank's lending performance increased in 2024 and exceeded the aggregate performance by 11.8 percentage points. The 2024 lending performance also exceeded the percentage of owner-occupied housing units by 13.1 percentage points.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2023	7.7	7.4	10	16.1	33,070	49.5
2024	7.4	7.6	3	9.4	2,795	7.2
Moderate						
2023	20.5	20.6	14	22.6	10,640	15.9
2024	21.3	22.6	11	34.4	13,225	33.8
Middle						
2023	14.9	13.0	11	17.7	4,925	7.4
2024	13.8	13.9	6	18.8	3,620	9.3
Upper						
2023	56.8	58.8	25	40.3	16,265	24.4
2024	57.5	55.8	12	37.5	19,460	49.8
NA						
2023	0.1	0.2	2	3.2	1,860	2.8
2024	0.1	0.2	0	0	0	0.0
Totals						
2023	100.0	100.0	62	100.0	66,760	100.0
2024	100.0	100.0	32	100.0	39,100	100.0
<i>Source: Bank Data; 2023 and 2024 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area.

In 2023, FCB’s performance in low-income tracts exceeded the percentage of businesses by 14.2 percentage points. The bank’s lending performance also exceeded the aggregate performance by 16.7 percentage points. In 2024, the bank's performance decreased and trailed the percentage of businesses. However, a relatively small percentage of the area’s businesses are located in low-income tracts. The bank has more opportunities for small business lending in moderate-income tracts, which contain a larger percentage of the area’s businesses. Therefore, the bank had stronger small business lending performance in moderate-income tracts, with performance significantly exceeding demographic data in 2023 and 2024 and aggregate performance in 2023. Notably, the bank originated 81.0 percent of small business loans in moderate-income tracts in 2024, which exceeded the percentage of businesses by 58.0 percentage points.

The following table demonstrates the bank’s geographic distribution of small business loans.

Geographic Distribution of Small Business Loans						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2023	12.6	10.1	11	26.8	3,523	21.1
2024	12.2	--	4	5.1	1,435	7.1
Moderate						
2023	23.0	23.0	20	48.8	9,522	57.1
2024	23.0	--	64	81.0	15,146	75.1
Middle						
2023	13.8	14.9	2	4.9	211	1.3
2024	12.8	--	3	3.8	1,375	6.8
Upper						
2023	50.5	51.9	8	19.5	3,415	20.5
2024	51.7	--	8	10.1	2,226	11.0
NA						
2023	0.2	0.1	0	0.0	0	0.0
2024	0.2	--	0	0.0	0	0.0
Totals						
2023	100.0	100.0	41	100.0	16,671	100.0
2024	100.0	--	79	100.0	20,182	100.0
<i>Source: 2023 D&B Data; Bank Data, 2023 CRA Aggregate Data Due to rounding, totals may not equal 100.0%.</i>						

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, adequate penetration among individuals of different income levels and business customers of different sizes. Good performance in home mortgage lending primarily supports this conclusion; however, small business lending performance was poor. Examiners focused on the percentage, by number, of home mortgage loans to low- and moderate-income borrowers and small business loans to businesses with GARs of \$1.0 million or less.

Home Mortgage Loans

The distribution of home mortgage loans reflects good penetration among individuals of different income levels, including low- and moderate- income borrowers.

FCB's lending activity to low- and moderate-income borrowers fluctuated throughout the evaluation period. As shown in the following table, the bank's 2023 performance for low-income borrowers was below the percentage of families but exceeded the aggregate by 5.0 percentage points. In addition, the bank was a leader among similarly situated institutions. According to 2023, home mortgage market share data, FCB ranked 24th out of 118 lenders who made loans to low-

income borrowers in the assessment area. FCB ranked ahead of similarly situated institutions including Fairfield County Bank (33rd) and Union Savings Bank (71st).

In 2024, the bank originated one mortgage to a low-income borrower. This performance was below both the aggregate performance and percentage of families. As noted previously, more than one-fourth of low-income families within the assessment area live below the poverty level. A low-income family living below the poverty level may face difficulties qualifying for a mortgage under conventional underwriting standards, considering the median housing value of \$599,550. These factors help explain the disparity between bank and aggregate lending to low-income individuals and the percentage of low-income families.

The bank's lending performance to moderate-income borrowers in 2023 was below aggregate performance and demographic data. However, in 2024, the bank's lending activity to moderate-income borrowers increased and exceeded both the aggregate performance and percentage of families by 11.2 percentage points. Market share data also supports the bank's good performance. In 2023, FCB ranked 55th out of 164 lenders who made loans to moderate-income borrowers in the assessment area. FCB's market ranking was comparable to Union Savings Bank (50th) and above Fairfield County Bank (76th). In 2024, FCB ranked 35th out of 157 lenders, which was in line with Union Savings Bank (35th) and above Fairfield County Bank (66th).

Examiners also considered the fact that 32.3 and 34.0 percent of the bank's 2023 and 2024 originations were for multifamily properties, which affected the bank's distribution across income categories, as these loans fall under the NA income category.

The following table demonstrates the bank's distribution of home mortgage loans by borrower income level.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2023	27.8	6.3	7	11.3	1,205	1.8
2024	27.7	7.3	1	3.1	115	0.3
Moderate						
2023	13.7	13.5	4	6.5	1,180	1.8
2024	13.8	13.8	8	25.0	2,390	6.1
Middle						
2023	14.9	13.2	11	17.7	4,795	7.2
2024	15.0	14.9	5	15.6	1,725	4.4
Upper						
2023	43.5	43.9	20	32.3	13,710	20.5
2024	43.6	50.4	7	21.9	4,215	10.8
NA						
2023	0.0	23.1	20	32.3	45,870	68.7
2024	0.0	13.6	11	34.4	30,655	78.4
Totals						
2023	100.0	100.0	62	100.0	66,760	100.0
2024	100.0	100.0	32	100.0	39,100	100.0
<i>Source: Bank Data; 2023 and 2024 CRA Aggregate Data Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans reflects, given the product lines offered by the institution, poor penetration among business customers of different sizes.

In 2023, the bank's performance was below the aggregate performance in lending to businesses with GARs of \$1.0 million or less. Performance in this category trended downwards in 2024. As noted previously, the 2023 CRA aggregate data revealed strong competition for small business loans within the assessment area with the top five lenders accounting for 76.9 percent of total loans.

The following table demonstrates the bank's distribution of small business loans by gross annual revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Gross Revenue Level	% of Businesses	CRA Aggregate % of #	#	%	\$(000s)	%
<= \$1,000,000						
2023	92.2	54.2	19	46.3	8,273	49.6
2024	91.1	--	10	12.7	2,990	14.8
> \$1,000,000						
2023	2.9	--	22	53.7	8,398	50.4
2024	2.9	--	69	87.3	17,192	85.2
Revenue Not Available						
2023	4.9	--	0	0.0	0	0.0
2024	6.0	--	0	0.0	0	0.0
Totals						
2023	100.0	100.0	41	100.0	16,671	100.0
2024	100.0	--	79	100.0	20,182	100.0
<i>Source: Bank Data; 2023 and 2024 CRA Aggregate Data Due to rounding, totals may not equal 100.0%.</i>						

Innovative or Flexible Lending Practices

The institution uses innovative and/or flexible lending practices to serve credit needs in the assessment area. During the evaluation period, the bank originated 110 innovative and/or flexible loans totaling approximately \$39.7 million. These programs benefited low- and moderate-income individuals and small businesses. The majority of innovative and/or flexible loans were through FCB's First-time Homebuyers Program. The bank also offered three home mortgage forbearances and two modifications, totaling \$346,549, to existing loans, providing additional flexibility to borrowers affected by financial hardship.

The following table illustrates the bank's innovative and/or flexible programs offered during the evaluation period.

Innovative and/or Flexible Lending Programs												
Type of Program	Partial 2021		2022		2023		2024		2025 YTD		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
First-time Homebuyers Program	4	1,402	54	19,377	22	8,986	10	3,346	6	2,301	96	35,412
Housing Development Fund	0	0	2	338	1	216	3	823	0	0	6	1,377
SBA 7(a)	1	1,000	5	1,500	2	400	0	0	0	0	8	2,900
Totals	5	2,402	61	21,215	25	9,602	13	4,169	6	2,301	110	39,689
<i>Source: Bank Data</i>												

Residential Loan Programs

The following is a summary of the bank's innovative and/or flexible home mortgage loan programs.

- **First-time Homebuyers Program:** The First-time Homebuyers Program offers fixed and adjustable-rate mortgages for first-time homebuyers. Borrowers can obtain up to 95.0 percent financing for fixed-rate mortgages and up to 90.0 percent financing for adjustable-rate mortgages with private mortgage insurance. The program includes a refund of the appraisal fee at closing and a 1/8 percent price reduction. The program's high loan-to-value options, low down payments, and reduced closing costs help low- moderate-income homebuyers obtain financing for home purchases. Loans originated through the First-time Homebuyers Program contributed to most of the bank's innovative and/or flexible lending activity.
- **Housing Development Fund Smart Move Program:** The Housing Development Fund Smart Move Program offers flexible home purchase loans to first-time homebuyers within limited income parameters. The program offers up to \$28,000 in downpayment assistance at 1.0 percent interest for low- and moderate-income first-time homebuyers. FCB is one of 13 lenders approved to offer this program in the state of Connecticut.

Small Business Loan Programs

The following is a summary of the bank's innovative and/or flexible small business loan programs.

- **Small Business Administration Loans (SBA):** SBA loans offer benefits such as flexible underwriting criteria, lower down payment requirements, and longer terms, and promote business growth and job creation. During the evaluation period, the bank originated loans under the SBA 7(a) loan program to support small businesses. The program helps entrepreneurs start and/or expand small businesses that have annual sales of \$5.0 million or less and/or do not exceed \$6.0 million in tangible net worth. Small businesses can use loan proceeds to acquire, refinance, or improve real estate, or to fund short-term or long-term working capital.

Community Development Loans

FCB made a relatively high level of community development loans. The bank originated 14 community development loans totaling \$32.0 million during the evaluation period. Most of the community development loans supported affordable housing efforts in the assessment area, which examiners identified as the primary need in the assessment area. More specifically, the affordable housing-related loans funded the construction or purchase of properties that offer rents below the U.S. Department of Housing and Urban Development (HUD) Fair Market Rent. While this level of community development lending represents a decrease since the prior evaluation period, when the bank originated 20 community development loans totaling \$35.5 million in the assessment area, eight out of the 20 loans originated during the prior evaluation period were SBA PPP loans. The PPP expired in May 2021; therefore, the bank did not have the opportunity to originate any PPP loans during the current evaluation period.

The total dollar amount of community development loans represents 2.1 percent of average total loans and 1.5 percent of average total assets. This represents a slight decrease compared to the previous evaluation when community development loans represented 2.6 percent of average total loans and 1.9 percent of average total assets.

FCB’s performance is comparable with similarly situated institutions, including Union Savings Bank, Fairfield County Bank, and Bankwell Bank. The bank originated a higher number of community development loans compared to two of the institutions, and a higher dollar volume of community development loans compared to one of the institutions.

The following table illustrates the bank’s community development lending activity by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Partial 2021	0	0	0	0	0	0	0	0	0	0
2022	1	2,600	1	1,250	0	0	0	0	2	3,850
2023	3	6,996	1	1,250	0	0	1	8,000	5	16,246
2024	6	7,817	0	0	0	0	1	4,078	7	11,895
YTD 2025	0	0	0	0	0	0	0	0	0	0
Total	10	17,413	2	2,500	0	0	2	12,078	14	31,991

Source: Bank Data

The following are notable examples of the bank’s community development loans.

- In 2022, FCB renewed a \$1.3 million line of credit to an organization in Stamford whose mission is to provide housing services for individuals experiencing homelessness and housing insecurities. This loan supports community development services to low- and moderate-income individuals in the assessment area.
- In 2023, the bank originated \$19.5 million of a \$28.5 million participation loan. The proceeds were used to construct a 130-unit apartment, located in Stamford in a low-income tract. Of the 130 units, 18 of the units (13.8 percent) are designated for low- and moderate-income residents. As a result, the bank received approximately \$2.7 million in community development loan credit for the project, which will provide affordable housing in the assessment area.
- In 2023, FCB originated an \$8.0 million loan to finance the construction of an indoor ice rink located in a moderate-income tract and an Enterprise Zone in Stamford. The ice rink will help revitalize the area by creating new jobs, offering accessible recreation, and providing a space for community engagement, thereby building neighborhood connections, and helping retain residents.

- In 2024, FCB originated a \$2.9 million mortgage to finance the construction of 13 townhouse units amongst five buildings located in a moderate-income tract in Stamford. The newly constructed units are designated for Section 8 tenants, which will provide affordable, subsidized housing in the assessment area.

INVESTMENT TEST

The Investment Test is rated High Satisfactory. The bank's performance under the Investment and Grant Activity and Responsiveness to Credit and Community Development Needs criteria primarily support this conclusion. The following sections discuss the bank's performance under each criterion.

Investment and Grant Activity

FCB has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. During the evaluation period, the bank had 267 qualified investments and grants totaling \$19.7 million. This included two new investments totaling \$4.1 million, 14 outstanding prior period investments with a current balance of \$14.2 million, and 251 grants totaling \$1.3 million. The total qualified investments and grants represent 0.9 percent of average total assets and 5.4 percent average total securities since the prior evaluation period. The total number of qualified investments and grants decreased since the prior evaluation, when the bank had 395 qualified investments and grants totaling \$22.0 million. Qualified investments and donations mainly supported activities that benefited affordable housing and community services for low- and moderate -income individuals, both of which are primary community development needs in the assessment area.

The total dollar amount of qualified investments and the bank's performance ratios in comparison to total assets and securities exceeded those of one other similarly situated institution and were below those of two other institutions.

The following table illustrates the bank's qualified investments and grants by year and purpose.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	11	10,773	0	0	3	3,444	0	0	14	14,217
Partial 2021	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	0	0	0	0
2023	2	4,116	0	0	0	0	0	0	2	4,116
2024	0	0	0	0	0	0	0	0	0	0
YTD 2025	0	0	0	0	0	0	0	0	0	0
Subtotal	13	14,889	0	0	3	3,444	0	0	16	18,333
Qualified Grants & Donations	39	234	200	1,002	6	21	6	61	251	1,318
Total	52	15,123	200	1,002	9	3,465	6	61	267	19,651

Source: Bank Data

The following are examples of the bank’s qualified investments:

Prior Period Qualified Investments

- FCB maintained 11 mortgage-backed securities (MBSs) with a current book value of \$10.8 million. These MBSs supported affordable housing because they are secured by home mortgage loans to low- and moderate-income individuals in the assessment area.
- The bank also maintained three investments totaling \$3.4 million in the following mutual funds: Community Capital Management CRA Fund, Community Economic Development Fund, and Solomon Hess SBA Loan Fund. The funds invest in specific qualified investments that promote economic development in low- and moderate-income areas and create jobs for low- and moderate-income individuals in the bank’s assessment area. The funds allocated support economic development activities.

Current Period Qualified Investments

- The bank purchased two Federal Home Mortgage Loan Corporation (FHLMC) MBSs totaling \$4.1 million. The mortgages collateralizing the securities were made to low- and moderate-income borrowers within the bank’s assessment area. Both underlying mortgages were also secured by property located in low- and moderate-income geographies. These investments support affordable housing.

Grants and Donations

- The bank made multiple contributions totaling \$40,000 to a children’s organization that offers accessible, affordable, and tailored education programs and counseling services to low- and moderate-income families within the assessment area. The donations supported community services targeted to low- and moderate-income families.

- FCB made \$36,846 in donations during the evaluation period to an organization that provides affordable housing and case management assistance to homeless individuals and families in lower Fairfield County. The donations supported affordable housing.

Responsiveness to Credit and Community Development Needs

FCB Bank exhibits good responsiveness to assessment area credit and community development needs. The bank's qualified investments primarily support affordable housing, which the community contact identified as a critical need given the high housing costs in the area.

Community Development Initiatives

The bank rarely uses innovative and/or complex investments to support community development initiatives. All the bank's new investments include FHLMC mortgage-backed securities, which are not particularly innovative or complex.

SERVICE TEST

The Service Test is rated High Satisfactory. The high level of community development services primarily supports this conclusion.

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank operates 13 full-service branch locations and 14 ATMs throughout the assessment area. There is at least one ATM at each branch location. As shown in the following table, FCB's branch and ATM distribution in low- and moderate-income census tracts is lower than the demographics. FCB operates three branches and ATMs in moderate-income tracts. The bank does not have any branches or ATMs in low-income tracts. However, three of the 10 branches and ATMs in middle- and upper-income census tracts are directly adjacent to a low- or moderate-income census tract. Specifically, the North Stamford, Prospect Street, and Summer Street branches are located within a two-mile radius of a low- or moderate-income tract.

The following table reflects the distribution of the bank's full-service branches and ATMs by census tract income level.

Branch and ATM Distribution by Geography Income Level								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	29	19.6	103,533	17.3	0	0.0	0	0.0
Moderate	32	21.6	152,607	25.5	3	23.1	3	21.4
Middle	22	14.9	83,784	14.0	2	15.4	3	21.4
Upper	64	43.2	256,738	42.9	8	61.5	8	57.1
NA	1	0.7	1,795	0.3	0	0.0	0	0.0
Total	148	100.0	598,457	100.0	13	100.0	14	100.0

*Source: 2020 U.S. Census Data; Bank Data
Due to rounding, totals may not equal 100.0%*

The census tract income designations for numerous tracts where the bank maintains branch offices changed from those reflected in the 2015 ACS data compared to the 2020 U.S. Census data. Specifically, the Hope Street branch, previously located in a middle-income census tract, is now located in a moderate-income census tract. Despite the census tract designation changes since the previous evaluation, the total number of branches and ATMs located in low- and moderate-income census tracts has not changed since the previous evaluation.

FCB's alternative delivery systems, which include online and mobile banking, remote deposit capture, telephone banking, safe deposit, and direct deposit, increase the accessibility of banking services.

Changes in Branch Locations

To the extent changes have been made, the bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Since the previous evaluation, the bank closed three branches in Norwalk and Stamford (2). The Westport Avenue branch in Norwalk and the Hope Street branch in Stamford were both located in middle-income census tracts. The Atlantic Street branch office in Stamford was located in a moderate-income census tract. The closure did not significantly impact public convenience for the moderate-income census tract because there are four other FCB branches in Stamford, with the Prospect Street branch located just 0.5 miles from the former Atlantic Street branch location.

Reasonableness of Business Hours and Services

Services and business hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals. Business hours are generally consistent across branches, with minor differences that do not disproportionately affect low- or moderate-income areas or individuals. General banking hours are 8:30 a.m. to 5:00 p.m., Monday through Friday, with five branches offering extended business hours on Fridays. Of the 13 branches, 11 branches, including those located in or adjacent to low- and moderate-income census tracts, also offer weekend hours on Saturdays. The Prospect Street branch, located in a

middle-income census tract, operates with a slightly adjusted schedule, offering drive-through teller hours from 8:30a.m. to 4:00 p.m., Monday through Thursday, and 8:30am to 5:00pm on Friday. Additionally, all branches offer drive-up services.

The bank’s loan and deposit product offerings do not vary among the branch offices. In addition, various alternative banking options, such as telephone banking, ATMs, and online and mobile banking, provide customers with 24-hour access to their accounts.

Community Development Services

FCB provides a relatively high level of community development services. The bank’s directors, officers, and employees provided 134 instances of financial expertise or technical assistance to community development organizations. The bank’s community development services primarily support community services and financial education for low- and moderate-income individuals. The bank also provided services that benefited affordable housing and economic development efforts within the assessment area. The number of community development services reflects a decrease compared to the prior evaluation period when the bank provided 180 instances of services.

FCB made a comparable number of community development services among similarly situated institutions during the evaluation period. The bank conducted a higher number of community development services compared to two institutions, and a lower number of services compared to one other institution.

The following table details the institution’s community development services by community development purpose and year.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
Partial 2021	0	0	0	0	0
2022	5	36	4	0	45
2023	6	38	4	0	48
2024	4	34	3	0	41
YTD 2025	0	0	0	0	0
Total	15	108	11	0	134
<i>Source: Bank Data</i>					

The following are examples of the bank’s community development service activities:

- Bank employees served on the loan committee of a Community Development Financial Institutions (CDFI) and HUD-certified counseling and learning agency in Stamford. The organization provides affordable housing, rental assistance, and first-time-homebuyer

counseling to low- and moderate-income individuals and families, which is responsive to community needs.

- A bank employee served on the board for a non-profit, economic development organization and certified SBA 504 lender. The organization assists small businesses with financing, job creation, and retention. Although the organization is located outside of the bank's assessment area, the activities extend to businesses within the bank's assessment area.
- A bank Board member serves as a director and member of the advisory committee of the Stamford Hospital Foundation. The Board member provides financial expertise for various programs and initiatives that help secure the financial resources necessary to support the hospital, which is in a low-income census tract. The activities support the provision of community services to low- and moderate-income individuals.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
 - i. The proportion of the bank's lending in the bank's assessment area(s);
 - ii. The dispersion of lending in the bank's assessment areas(s); and
 - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
 - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
 - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
 - iii. Small business and small farm loans by loan amount at origination; and
 - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

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 bank 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.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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.

Qualified Investment: A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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 Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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.