



PUBLIC DISCLOSURE

September 15, 2025

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Windsor Federal Bank
Charter Number: 703781

270 Broad Street
Windsor, CT 06095

Office of the Comptroller of the Currency

91 Fieldcrest Avenue
Suite A-30
Edison, NJ 08837

NOTE: 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, and should not 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.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The Lending test is rated: Satisfactory.

The Community Development test is rated: Outstanding.

The major factors that support this rating include:

- The bank’s average loan-to-deposit (LTD) ratio is more than reasonable, based on the bank’s size, financial condition, and credit needs of the assessment area (AA).
- A majority of loans were originated or purchased within the bank’s assessment area.
- The distribution of loans to individuals of different income levels is reasonable.
- The distribution of loans across geographies of different income levels is reasonable.
- Community Development (CD) activities, including CD loans, qualified investments, and CD services, reflect excellent responsiveness to the CD needs of the bank’s AA.

Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AA, the bank’s LTD ratio was more than reasonable.

Windsor Federal Bank’s (Windsor) LTD ratio was calculated using quarterly data from the first quarter of 2022 through the fourth quarter of 2024. The bank had an average quarterly LTD ratio of 82.3 percent, with a high of 88.8 percent and a low of 72.1 percent. Seven other financial institutions with similar size and location had an average quarterly LTD ratio of 76.4 percent, with an average high of 93.6 percent and an average low of 34.4 percent over the same timeframe.

Lending in Assessment Area

A majority of the bank’s loans were inside its AA.

The bank originated and purchased 60.0 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	320	60.0	213	40.0	533	52,845	42.5	71,657	57.6	124,502
Total	320	60.0	213	40.0	533	52,845	42.5	71,657	57.6	124,502

Source: 1/1/2022 - 12/31/2024 Bank Data.
 Due to rounding, totals may not equal 100.0%

Description of Institution

Founded in 1936, Windsor is a federally chartered savings association located in Windsor, Connecticut. Windsor is an \$824.3 million single-state financial institution organized under a two-tiered mutual holding company structure, including Windsor Federal Mutual Holding Company and Windsor Federal Bancorp, Inc. The sole purpose of the Mutual Holding Company and the Bancorp is to support the bank operations of the institution.

The bank operates eleven branches located in the towns of Windsor, East Windsor, South Windsor, Bloomfield, Granby, and Suffield within the Hartford-West Hartford-East Hartford, CT Metropolitan Statistical Area (Hartford MSA). Windsor has Eight full-service branches that offer a full line of traditional banking products and services, and three branches are limited-service. Two limited-service branches are located within Windsor High School and Bloomfield High School, with the third located in a retirement community in the Town of Bloomfield. There are full service Interactive Teller Machines (ITMs) located in all full-service offices. There are no ITMs nor automated teller machines (ATMs) at the limited-service branches. One limited-service branch in Bloomfield was closed during the evaluation period. There were no branches opened during the evaluation period.

Windsor offers a wide range of traditional loan and deposit products. Deposit products include personal and business checking accounts, savings accounts, money market deposit accounts, and certificates of deposit. Loan products include consumer loans, home equity loans, home equity lines of credit, residential mortgage loans, commercial loans, and commercial real estate loans. During the performance period, the bank's strategic focus was commercial lending. The bank originated and participated in Federal Housing Administration (FHA) and Connecticut Housing Finance Authority (CHFA) programs for residential mortgages. The bank participates in the Federal Home Loan Bank's Equity Builder, Housing Our Workforce, and Lift Up Homeownership grant programs. The bank also offers Small Business Administration (SBA) guaranteed loans.

As of December 31, 2024, Windsor reported total assets of \$824.3 million, with \$612.9 million in net loans and leases, which represents 74.4 percent of total assets, and \$692.3 million in total deposits. The loan portfolio included loans secured by real estate of \$442.0 million or 71.5 percent of net loans, commercial loans totaling \$76.5 million or 12.4 percent of net loans, and \$99.5 million in other loans or 16.1 percent of net loans. Tier 1 capital totaled \$83.2 million.

There were no financial, legal, or other impediments that would hinder Windsor's ability to meet the credit needs of the communities it serves in the AA. Windsor's prior CRA performance evaluation was dated March 7, 2022, and was rated Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Windsor was evaluated under the intermediate small bank examination procedures, which include the lending test and CD test. The evaluation period for the lending test and the CD test is January 1, 2022 through December 31, 2024.

The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The OCC evaluated home mortgage loans. Examiners did not consider small business loans or consumer loans in this evaluation, as both were not a substantial majority of Windsor's business. The bank did not offer small farm lending during the evaluation period. For lending performance, the loan distribution analyses compared originated and purchased home mortgage loans to demographic and aggregate data under the applicable Lending Test components. Aggregate data illustrates how the bank is performing compared to other lenders in the AA and provides context on the reasonableness of the bank's performance. For the overall evaluation period, examiners placed more emphasis on borrower and geographic demographic distributions than on aggregate performance.

For the home mortgage borrower distribution analysis, examiners considered the impact that income, poverty levels and housing costs have on limiting homeownership opportunities for LMI individuals and families. Additionally, examiners considered the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics.

Census tract income level designation changes became effective January 1, 2024, following U.S. Census data updates. This required an analysis of loan data against applicable demographic data for two separate analysis periods. Examiners analyzed home mortgage loan data from January 1, 2022 through December 31, 2023 (2022 – 2023 analysis period) using 2020 U.S. Census demographic information and home mortgage loan data from January 1, 2024 through December 31, 2024 (2024 analysis period) using 2024 U.S. Census demographic information. Examiners placed more weight on the 2022-2023 analysis period due to the larger number of loans originated.

The CD test evaluates the bank's responsiveness to CD needs in its AA through qualified lending, investments and donations, and services. The OCC included CD activities that met the regulatory definition for CD. Examiners compared the dollar amount of qualified CD activities to tier 1 capital to provide perspective regarding the relative level of qualified CD activities.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on performance in the State of Connecticut. The state rating is based on performance in the bank's one AA. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Connecticut

CRA rating for the State of Connecticut: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans to individuals of different income levels is reasonable.
- The distribution of loans across geographies of different income levels is reasonable.
- CD activities, including CD loans, qualified investments, and CD services, reflect excellent responsiveness to the CD needs of the bank's AA.

Description of Institution's Operations in Connecticut

Windsor has one AA in the Hartford-West Hartford-East Hartford, CT MSA. The AA consists of eight of the 29 cities and townships within Hartford County and includes the towns of Bloomfield, East Granby, East Windsor, Granby, Suffield, Windsor, South Windsor, and Windsor Locks. The bank's AA contains 31 contiguous census tracts.

Windsor's AA meets the requirements set forth in the regulation and does not arbitrarily exclude any low- and moderate-income (LMI) geographies or reflect illegal discrimination. Windsor does not conduct business in the City of Hartford, the largest city in the Hartford metropolitan area, due to limited resources and capability to support a city of its size. Of the 31 census tracts in the AA, two (6.5 percent) are moderate-income geographies, fifteen (48.4 percent) are middle-income geographies, and fourteen (45.2 percent) are upper-income geographies. There are no low-income geographies in the AA.

The overall population of the AA is 133,617, with 51,291 households and 35,108 families. The median family income for the AA is \$123,800. With respect to family distribution by income level, 14.4 percent of the families are low-income, 17.6 percent are moderate-income, 21.7 percent are middle-income, and 46.2 percent are upper income. Within this AA, 3.2 percent of families are below the poverty level.

Assuming a 30-year mortgage with a 6.0 percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$61,900 per year (or less than 50 percent of the 2024 FFIEC adjusted median family income in the AA) could afford a \$258,110 mortgage with a payment of \$1,548 per month. A moderate-income borrower making \$99,040 per year (or less than 80 percent of the 2024 FFIEC adjusted median family income in the AA) could afford a \$412,976 mortgage with a payment of \$2,476 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$2,147. The median housing value in the AA is \$349,900 and \$399,900 in 2022 and 2024, respectively, reflecting a percent change of 14.3 percent during the evaluation period according to Realtor.com data.

Per the Moody's Analytics report from January 2025, top industries in the area include manufacturing (anchored by aerospace), financial services, government, education and health services, and retail trade.

Major employers in the MSA include Harford HealthCare, RTX Corp., University of Connecticut, CVS Health Corp., Walmart, and Pratt & Whitney. The report shows the Hartford MSA economy is stagnating. Job growth has stalled, particularly in defense-oriented manufacturing, which underperformed for the fourth consecutive year. While public sector employment remained flat, the area saw modest expansion in financial services, marking the first annual growth in nearly a decade. The local economy also benefited from a declining unemployment rate, driven more by labor force contraction than strong hiring.

As of December 2024, the Bureau of Labor Statistics (BLS) reported the unemployment rate for Hartford County as 2.7 percent which is the same unemployment rate for CT at 2.7 percent and below the national unemployment rate of 4.1 percent. Unemployment decreased in Hartford County and CT from a high of 5.4 percent in January 2022. Federal unemployment remained relatively unchanged over the evaluation period.

To assess local economic conditions and community needs, the OCC engaged with CD organizations within the AA. A key contact for the bank's AA was a nonprofit organization that serves the city's most economically disadvantaged residents through a comprehensive range of services to LMI individuals, including food assistance, housing support, health-related services, and programs to prevent homelessness. The contacts stated that opportunities exist for financial institutions to participate in CD activities and identified the following community needs:

- Strengthening community outreach efforts by local financial institutions, especially regarding CRA-related initiatives, to improve communication with community stakeholders.
- Expanding financial literacy programs tailored specifically for very low-income individuals experiencing multi-generational poverty, beyond the existing programs for moderate-income populations.
- Addressing ongoing challenges in developing affordable housing, including overcoming financing barriers and mitigating construction delays, with increased support from financial institutions to accelerate these projects.
- Increasing contributions to flexible funding programs aimed at alleviating homelessness.
- Encouraging philanthropic donations from local banks to support CD initiatives.

Hartford MSA 2022-2023

Assessment Area(s) - Hartford MSA 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	0.00	6.45	48.39	45.16	0.00
Population by Geography	133,617	0.00	5.03	48.17	46.79	0.00
Housing Units by Geography	54,200	0.00	5.27	49.86	44.87	0.00
Owner-Occupied Housing by Geography	41,645	0.00	4.07	46.89	49.05	0.00
Occupied Rental Units by Geography	9,646	0.00	9.14	63.29	27.57	0.00
Vacant Units by Geography	2,909	0.00	9.69	47.78	42.52	0.00
Businesses by Geography	7,060	0.00	5.84	53.16	41.01	0.00
Farms by Geography	327	0.00	2.14	42.51	55.35	0.00

Family Distribution by Income Level	35,108	14.26	17.55	21.62	46.57	0.00
Household Distribution by Income Level	51,291	17.94	14.47	17.36	50.23	0.00
Unemployment rate (%)	4.63	0.00	5.08	5.37	3.77	0.00
Households Below Poverty Level (%)	5.44	0.00	9.36	6.38	3.95	0.00
Median Family Income (Hartford MSA)		\$101,543			Median Housing Value	\$255,200
Median Family Income (Hartford MSA) for 2023		\$118,700			Median Gross Rent	\$1,319
					Families Below Poverty Level	3.19
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Hartford MSA 2024

Assessment Area(s) - Hartford MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	0.00	6.45	48.39	45.16	0.00
Population by Geography	133,617	0.00	5.03	48.17	46.79	0.00
Housing Units by Geography	54,200	0.00	5.27	49.86	44.87	0.00
Owner-Occupied Housing by Geography	41,645	0.00	4.07	46.89	49.05	0.00
Occupied Rental Units by Geography	9,646	0.00	9.14	63.29	27.57	0.00
Vacant Units by Geography	2,909	0.00	9.69	47.78	42.52	0.00
Businesses by Geography	0	0.00	0.00	0.00	0.00	0.00
Farms by Geography	0	0.00	0.00	0.00	0.00	0.00
Family Distribution by Income Level	35,108	14.42	17.62	21.74	46.22	0.00
Household Distribution by Income Level	51,291	17.93	14.46	17.38	50.24	0.00
Unemployment rate (%)	4.63	0.00	5.08	5.37	3.77	0.00
Households Below Poverty Level (%)	5.44	0.00	9.36	6.38	3.95	0.00
Median Family Income (Hartford MSA)		\$102,081			Median Housing Value	\$255,200
Median Family Income (Hartford MSA) for 2024		\$123,800			Median Gross Rent	\$1,319
					Families Below Poverty Level	3.19
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Connecticut

As the bank’s only AA, the Hartford MSA AA received a full-scope review

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

The bank’s performance under the Lending Test in Connecticut is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Connecticut was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

2022-2023

There are no low-income geographies located within the AA. The percentage of home mortgage loans to borrowers in moderate-income census tracts was below the percent of owner-occupied housing units and aggregate lending.

2024

There are no low-income geographies located within the AA. The percentage of home mortgage loans to borrowers in moderate-income census tracts was above the percent of owner-occupied housing units and below aggregate lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

2022-2023

The percentage of home mortgage loans to low-income borrowers was above the percent of low-income families and aggregate lending. The percentage of home mortgage loans to moderate-income borrowers was above the percent of moderate-income families and below aggregate lending.

2024

The percentage of home mortgage loans to low-income borrowers was below the percent of low-income families and above aggregate lending. The percentage of home mortgage loans to moderate-income borrowers was above the percent of moderate-income families and aggregate lending.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Connecticut is rated Outstanding.

Based on a full-scope review, the bank exhibited excellent responsiveness to CD needs in the state of Connecticut through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Number and Amount of Community Development Loans

Refer to the CD Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Hartford MSA	10	76.9	23,920	94.0
Statewide	3	23.1	1,527	6.0
Total	13	100.0	25,447	100.0

Examiners determined that 13 loans totaling \$25.5 million met the definition of CD and qualified for CD lending consideration. These loans provided community service, affordable housing, and economic development opportunities for LMI individuals and communities.

The following are examples of CD loans the bank originated or purchased in the state of Connecticut:

- \$21.5 million to provide for affordable housing and attraction and retention of new businesses to the AA.
- \$1 million to provide energy assistance programs for families experiencing poverty and low-income working families who are not eligible for government assistance programs.
- \$70,000 to provide food, clothing, and health services to families and individuals in need.

Examiners also qualified three CD loans outside of the bank's AA totaling \$1.5 million due to the bank's excellent responsiveness within its AA. The loans were made to promote economic growth, job retention for LMI individuals, and community services for LMI individuals.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Hartford MSA	3	1,089	141	581	144	96.0	1,670	25.4	0	0
Statewide	4	4,150	2	758	6	4.0	4,908	74.6	0	0
Total	7	5,239	143	1,339	150	100.0	6,578	100.0	0	0

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investment, including prior period investments that remain outstanding as of the end of evaluation period.

The dollar volume of current and prior period CD investments and donations represented 7.9 percent of tier 1 capital as of December 31, 2024. Investments include:

- Two municipal bonds used to provide affordable housing for LMI individuals and families along with improvements to local schools, a senior center, and social service improvements totaling \$971,500.
- Deposits totaling \$245,000 with a minority owned financial institution to support revitalization and stabilization efforts.
- Three municipal bonds to provide for school and town facilities improvements within the AA totaling \$1.1 million.
- Additional investments with a balance of \$4.1 million did not directly benefit the bank's AA. However, due to the bank's excellent level of qualified investments in the AA, examiners gave these investments positive consideration.
- Windsor made 140 qualifying donations totaling \$121,600 to various organizations. These organizations supported food banks and hunger relief programs, health services for LMI individuals and families, affordable housing projects and housing assistance organizations, and small businesses to promote economic development and job creation inside the AA.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, approximately 55 bank representatives actively served as board members, committee participants, and volunteers for 53 qualifying organizations. These organizations provide vital services such as:

- Affordable housing development and support, including partnerships with local housing authorities and nonprofit housing providers.
- Financial literacy and education programs targeted toward LMI individuals, including youth and seniors.
- Behavioral health and wellness services for vulnerable and economically disadvantaged populations.
- Small business development and job training to support workforce readiness and local economic growth.

These service activities go beyond routine participation and often include leadership roles, such as chairing committees or leading financial planning efforts for nonprofit entities. Several bank employees

provided technical assistance, such as financial workshops, grant application review, and strategic planning support for organizations that directly benefit LMI communities.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/22 to 12/31/24	
Bank Products Reviewed:	Home mortgage Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State		
Connecticut	Full-scope	Partial Hartford County including the towns of Bloomfield, East Granby, East Windsor, Granby, Suffield, Windsor, South Windsor, and Windsor Locks.

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Windsor Federal Bank	Satisfactory	Outstanding	Satisfactory
State:			
Connecticut	Satisfactory	Outstanding	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which 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).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at 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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 percent and less than 120 percent, in the case of a geography

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

Rating Area: A rated area is a state or multistate metropolitan statistical 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 statistical area, the institution will receive a rating for the multistate metropolitan statistical area.

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

Small Loan(s) to Farm(s): 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 or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Hartford MSA 2023	24	38,139	100.00	7,561	--	--	--	4.07	3.31	4.11	46.89	52.07	46.22	49.05	44.63	49.66	--	--	--		
Total	24	38,139	100.00	7,561	--	--	--	4.07	3.31	4.11	46.89	52.07	46.22	49.05	44.63	49.66	--	--	--		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Hartford MSA 2024	78	14,706	100.00	20,825	--	--	5.70	4.07	5.13	14.74	46.89	57.69	44.97	49.05	37.18	34.57	--	--	0.01		
Total	78	14,706	100.00	20,825	--	--	5.70	4.07	5.13	14.74	46.89	57.69	44.97	49.05	37.18	34.57	--	--	0.01		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Hartford MSA 2023	24	38,1	100.00	7,561	14.26	16.5	11.61	17.55	23.1	26.90	21.62	26.8	24.31	46.57	31.8	26.05	--	1.65	11.12	
Total	24	38,1	100.0	7,561	14.26	16.5	11.61	17.55	23.1	26.90	21.62	26.8	24.31	46.57	31.8	26.05	--	1.65	11.12	
	2	39	0			3			4			6		2						

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Hartford MSA 2024	78	14,706	100.00	20,825	14.42	10.26	9.81	17.62	29.49	26.98	21.74	24.36	22.67	46.22	34.62	27.15	--	1.28	13.39	
Total	78	14,706	100.00	20,825	14.42	10.26	9.81	17.62	29.49	26.98	21.74	24.36	22.67	46.22	34.62	27.15	--	1.28	13.39	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%