



## PUBLIC DISCLOSURE

September 23, 2024

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Connecticut Community Bank, National Association  
Charter Number 23664

605 West Avenue  
3rd Floor  
Norwalk, CT 06850

Office of the Comptroller of the Currency

7 Times Square, 10th Floor  
New York, NY 10036

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 overall performance of Connecticut Community Bank, National Association (CCB or the bank) reflects satisfactory responsiveness to community credit needs. The major factors that support this rating include:

- The Lending Test rating is based on the bank's record of performance in meeting the credit needs of its assessment areas (AA) during the evaluation period through its lending activities.
  - The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and business strategy.
  - The bank originated a majority of its loans within its AAs.
  - The distribution of loans to businesses of different sizes is reasonable.
  - The distribution of loans across geographies of different income levels is excellent.
- The Community Development (CD) Test rating is based on the aggregate assessment of the bank's CD activities for loans, investments, and services in the bank's AAs. CD activities, including CD loans, qualified investments, and CD services, reflect excellent responsiveness to the CD needs of the bank's AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. CCB's average LTD ratio over the 12 quarters from March 31, 2021 through December 31, 2023 was 62.0 percent. During this period, the bank's ratio performance ranged from a low of 53.3 percent on March 31, 2022 to a high of 76.7 percent on March 31, 2021. The OCC compared the bank's LTD ratio performance to four peer institutions of similar size, location, and product offerings. The bank's performance was lower in comparison to the peer group, which showed an average LTD ratio of 93.8 percent, ranging from a low of 72.1 percent to a high of 112.0 percent. The bank's lower than peer group performance was reasonable considering the strong competition in the local market during the review period combined with the bank's conservative lending practices and strategy of maintaining a small consumer loan portfolio.

### Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated 50.3 percent of its total loans by number inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The table

below illustrates the number and dollar volume of small business loans the bank originated inside and outside of its AAs.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans</b>				<b>Total</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Small Business										
2021	289	55.5	232	44.5	521	39,982,000	51.9	37,107,000	48.1	77,089,000
2022	42	35.0	78	65.0	120	12,771,000	34.9	23,857,000	65.1	36,628,000
2023	31	39.7	47	60.3	78	8,786,000	33.9	17,163,000	66.1	25,949,000
<b>Total</b>	<b>362</b>	<b>50.3</b>	<b>357</b>	<b>49.7</b>	<b>719</b>	<b>61,539,000</b>	<b>44.1</b>	<b>78,127,000</b>	<b>55.9</b>	<b>139,666,000</b>

*Source: Bank Data*  
*Due to rounding, totals may not equal 100.0%*  
*Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.*

## Description of Institution

CCB is a full-service community bank headquartered in Norwalk, Connecticut and wholly owned by Associated Community Bancorp, Inc. CCB's market area includes Fairfield and Hartford counties in Connecticut where CCB has its two AAs. The Fairfield County AA is in the Bridgeport–Stamford-Norwalk Metropolitan Statistical Area (MSA) #14860. The Hartford County AA is in the Hartford-East Hartford-Middletown MSA #25540. The bank maintains eight branches with onsite Automated Teller Machines (ATM) within the Fairfield County AA, which operate as Stamford Bank & Trust, Norwalk Bank & Trust, Darien Bank & Trust, Westport National Bank (which includes two branches), and Greenwich Bank & Trust (which includes three branches). Within the Hartford County AA, CCB maintains one non-retail branch (the InsurBanc division). Its facility in Hartford County does not provide in-person deposit-taking services. The InsurBanc Division specializes in providing lending and electronic depository services to insurance agencies and state associations throughout the United States and does not operate as a traditional retail branch. The bank did not open or close any branches during the evaluation period.

CCB offers products and services for both personal and business customers. Personal products include checking, savings, certificates of deposits, individual retirement accounts, consumer loans (non-real estate), and credit cards. Business products include checking, savings, certificates of deposits, term loans, lines and letters of credit, mortgage loans, construction loans, Small Business Administration (SBA) loans, credit cards, and insurance agency acquisition and perpetuation loans.

As of December 31, 2023, CCB had total assets of \$547.3 million, with \$469.3 million in total deposits and \$314.4 million in net loans. The bank's tier 1 capital totaled \$65.9 million. Net loans comprised 57.5 percent of total assets. The loan portfolio consisted of approximately

\$145.0 million in commercial real estate (CRE) loans and \$151.1 million in commercial & industrial (C&I) loans. CRE and C&I loans constituted a significant portion of the CCB loan portfolio at 93.0 percent. CCB discontinued offering residential real estate loans in October 2022. Multifamily residential and 1-4 family residential combined constituted less than 1 percent of outstanding gross loans.

During the evaluation period, CCB offered SBA Payment Protection Program (PPP) loans, which was enacted as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to aid small businesses in maintaining operations and payroll costs while avoiding layoffs and salary reductions. During the evaluation period, the bank originated 425 PPP loans totaling \$56.2 million.

The bank has no financial or legal impediments affecting its ability to meet the credit needs of its community. The prior CRA performance evaluation, dated August 9, 2021, resulted in a Satisfactory rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

To evaluate CCB's performance under the CRA, the OCC used intermediate small bank examination procedures, which include a Lending Test and a CD test.

The Lending Test evaluated the bank's record of meeting the credit needs of its AAs. CCB's primary loan product was business loans based on the bank's loan portfolio composition and lending activity by product type during the evaluation period. The OCC did not assess residential lending during the review as the bank ceased residential loan operations in October 2022. CCB had minimal residential real estate origination activity in both AAs, resulting in sample sizes below the threshold to conduct a meaningful analysis.

For the Lending Test, lending for the entire evaluation period was used to conclude on geographic distribution and borrower distribution of loans. However, the bank's performance in 2021 was assessed separately from its performance in 2022-2023 due to updates in the U.S. Census information related to the demographic and aggregate comparators. The OCC also evaluated qualified loans, investments, and CD services from January 1, 2021, through December 31, 2023.

### **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) 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**

CCB's overall rating is based solely on the state of Connecticut rating as this is the only rating area for the bank.

### **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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:

- CCB's LTD ratio is reasonable given the bank's size, financial condition, and business strategy.
- The bank originated a majority of its loans within its AAs.
- The geographic distribution of loans reflects excellent distribution throughout the bank's AAs.
- Lending activities represent reasonable distribution among businesses of different sizes.
- CCB's CD activities show excellent responsiveness to identified community needs.
- The bank did not receive any CRA-related complaints during the evaluation period.

### Description of Institution's Operations in Connecticut

CCB identified two AAs consisting of 253 census tracts (CT). The AAs identified are the Fairfield County AA and Hartford County AA located in the Bridgeport-Stamford-Norwalk, Connecticut MSA (14860) and Hartford-East Hartford-Middletown, Connecticut MSA (25540), respectively.

As of 2023, the AAs consist of 64 low-income tracts, 60 moderate-income tracts, 50 middle-income tracts, and 75 upper-income tracts.

The total population in the AAs was 972,307 as of December 31, 2023, comprising 364,640 households and 232,746 families. Of this population, 207,049 (21.3 percent) individuals resided in low-income geographies, 261,835 (26.9 percent) resided in moderate-income geographies, 198,590 (20.4 percent) resided in middle-income geographies, and 298,529 (30.7 percent) resided in upper-income geographies. The AAs meet the requirements of the regulation and do not arbitrarily exclude low- and moderate-income geographies.

## Fairfield Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021 Fairfield County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	127	22.0	22.0	18.1	37.8	0.0
Population by Geography	533,818	18.6	25.4	19.0	37.0	0.0
Housing Units by Geography	208,006	18.6	26.4	20.9	34.1	0.0
Owner-Occupied Units by Geography	113,626	8.4	21.2	20.6	49.8	0.0
Occupied Rental Units by Geography	76,463	31.2	33.5	22.4	12.9	0.0
Vacant Units by Geography	17,917	29.9	29.1	15.9	25.1	0.0
Businesses by Geography	97,827	14.2	20.8	20.1	45.0	0.0
Farms by Geography	2,122	17.0	24.3	21.6	37.1	0.0
Family Distribution by Income Level	127,605	29.3	15.3	15.9	39.5	0.0
Household Distribution by Income Level	190,089	30.0	15.1	15.5	39.3	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$529,856
			Median Gross Rent			\$1,407
			Families Below Poverty Level			8.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The median family income (MFI) in the Fairfield County AA during 2021 was \$105,628. Family distribution by income level was 29.3 percent for low-income, 15.3 percent for moderate-income, 15.9 percent for middle-income, and 39.5 percent for upper-income. Within this AA, 8.7 percent of families were below poverty level.

The median housing value in the Fairfield County AA was \$529,856 in 2021. This median housing value level constrained lending opportunities to low- and moderate-income borrowers, as the proportion of properties affordable to these borrowers was limited. Based on the MFI, the maximum income level for low-income borrowers was \$52,814, or 10 times the median housing value. The maximum income level for moderate-income borrowers was \$84,502, making the median housing value 6.3 times above the maximum of moderate-income borrowers.

Based on 2021 Peer Small Business Data, 195 lenders originated loans in the Fairfield County AA. The top five mortgage lenders in the AA have a combined total market share of 58.4 percent and include American Express National Bank (22.8 percent market share), JP Morgan Chase Bank, N.A. (12.7 percent market share), Bank of America, N.A. (9.9 percent market share), Citibank, N.A. (7.3 percent market share), and People's United Bank, N.A. (6.3 percent).



According to the 2021 Business Demographic Data, there were a total of 99,949 businesses in the Fairfield County AA. The service industry was the AA’s primary industry, accounting for 36.7 percent of all businesses. Approximately 14.2 percent of the businesses are located in low-income geographies, 20.8 percent in moderate-income geographies, 20.1 percent in middle-income geographies, and 45.0 percent in upper-income geographies. Approximately 90.4 percent of the businesses reporting have revenues of less than \$1 million.

As of December 2021, the U.S. Bureau of Labor Statistics (BLS) reported the unemployment rate for Fairfield County was 4.3 percent. This was comparable to the BLS-reported unemployment rate for Connecticut of 4.4 percent, but above the national unemployment rate of 3.9 percent.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022-2023 Fairfield County AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	136	21.3	23.5	16.2	38.2	0.7
Population by Geography	548,978	18.9	27.8	15.2	37.8	0.3
Housing Units by Geography	215,768	18.9	28.3	16.3	36.1	0.4
Owner-Occupied Units by Geography	114,305	8.7	23.1	16.8	51.4	0.1
Occupied Rental Units by Geography	83,247	32.1	35.1	16.0	16.1	0.7
Vacant Units by Geography	18,216	23.3	30.3	14.5	31.2	0.6
Businesses by Geography	128,414	13.8	24.7	15.0	46.2	0.2
Farms by Geography	2,637	13.9	31.0	16.2	38.8	0.2
Family Distribution by Income Level	132,162	29.5	14.6	15.3	40.5	0.0
Household Distribution by Income Level	197,552	30.1	15.2	14.4	40.3	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$120,156	Median Housing Value			\$566,387
			Median Gross Rent			\$1,625
			Families Below Poverty Level			8.3%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The MFI in the Fairfield County AA was \$120,156 for 2022-2023. Family distribution by income level was 29.5 percent for low income, 14.6 percent for moderate-income, 15.3 percent for middle-income, and 40.5 percent for upper-income. Within this AA, 8.3 percent of families were below poverty level.

The median housing value in the Fairfield County AA was \$566,387 in 2022-2023. This median housing value constrained lending opportunities to low- and moderate-income borrowers, as the proportion of properties affordable to these borrowers was limited. Based on the MFI, the

maximum income level for low-income borrowers was \$60,078, making the median housing value 9.4 times greater than the maximum low-income level. The maximum income level for moderate-income borrowers was \$96,125, making the median housing value 5.9 times the maximum moderate-income level.

Based on 2022 Peer Small Business Data, 149 lenders originated loans in the Fairfield County AA. The top five mortgage lenders in the AA have a combined total market share of 71.2 percent and include American Express National Bank (31.6 percent market share), JP Morgan Chase Bank, N.A. (15.4 percent market share), Bank of America N.A. (9.5 percent market share), Citibank, N.A. (9.4 percent market share), and Capital One, N.A. (5.2 percent market share).

According to the 2023 Business Demographic Data, there were a total of 131,051 businesses in the Fairfield County AA. The service industry was the AA's primary industry, accounting for 34.2 percent of all businesses. Approximately 13.8 percent of the businesses are located in low-income geographies, 24.7 percent in moderate-income geographies, 15.0 percent in middle-income geographies, and 46.2 percent in upper-income geographies. Approximately 92.3 percent of the businesses reporting have revenues of less than \$1 million.

The top employers in the Fairfield region were Sikorsky Aircraft Corp.; Boehringer Ingelheim Corp.; ASML US Inc.; Ceci Brothers Inc.; Deloitte; Dooney & Bourke; Dorel Sports; Gartner Inc.; and Greenwich Hospital.

As of December 2023, the BLS reported the unemployment rate for Fairfield County was 4.1 percent. This was comparable to the BLS-reported unemployment rate for Connecticut of 4.0 percent, but slightly above the national unemployment rate as 3.7 percent.

To determine local economic conditions and community needs, the OCC reviewed information from a community contact serving the bank's Fairfield County AA. The community contact identified affordable housing as the primary need in the community. The community noted that at least 10 percent of all new developments in the area needed to be dedicated to affordable housing to address the issue.

## Hartford Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021 Hartford County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	114	35.1	21.1	21.1	21.1	1.8
Population by Geography	423,451	30.4	23.0	23.6	22.3	0.7
Housing Units by Geography	180,576	30.7	23.6	24.6	21.0	0.0
Owner-Occupied Units by Geography	88,299	10.5	22.0	33.8	33.7	0.0
Occupied Rental Units by Geography	75,506	50.3	25.1	16.2	8.4	0.0
Vacant Units by Geography	16,771	49.4	25.5	14.2	10.8	0.1
Businesses by Geography	49,833	24.2	21.2	25.3	28.7	0.5
Farms by Geography	901	15.2	23.6	29.6	31.5	0.0
Family Distribution by Income Level	102,226	33.3	17.2	17.7	31.8	0.0
Household Distribution by Income Level	163,805	34.9	16.0	16.1	33.1	0.0
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$88,016	Median Housing Value			\$219,876
			Median Gross Rent			\$944
			Families Below Poverty Level			14.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The median family income in the Hartford County AA was \$88,016 for 2021. Family distribution by income level was 33.3 percent for low-income, 17.2 percent for moderate-income, 17.7 percent for middle-income, and 31.8 percent for upper-income. Within the AA, a significant portion of families were below poverty level at 14.1 percent.

The median housing value in the Hartford County AA was \$219,876 in 2021. The maximum income level for the low-income level is \$44,008, indicating the average home value is 5.0 times larger than the maximum low-income level. The maximum income level for moderate-income borrowers is \$70,413, making the median housing value 3.2 times the maximum moderate-income level.

Based on 2021 Peer Small Business Data, 166 lenders originated loans in the Hartford County AA. The top five mortgage lenders in the AA have a combined total market share of 49.8 percent and include American Express National Bank (16.7 percent market share), Bank of America, N.A. (10.6 percent market share), Webster Bank, N.A. (9.0 percent market share), People's United Bank, N.A. (7.2 percent market share), and US Bank NA (6.3 percent market share).

According to the 2021 Business Demographic Data, there were a total of 50,734 businesses in the Hartford County AA. The service industry was the AA’s primary industry, accounting for 38.5 percent of all businesses. Approximately 35.1 percent of the businesses are located in low-income geographies, 21.1 percent in moderate-income geographies, 21.1 percent in middle-income geographies, and 21.1 percent in upper-income geographies. Approximately 87.4 percent of the businesses reporting have revenues of less than \$1 million.

As of December 31, 2021, the BLS reported the unemployment rate for Hartford County was 4.5 percent. This was comparable to the BLS-reported unemployment rate for Connecticut of 4.4 percent, but above the national unemployment rate of 3.9 percent.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022-2023 Hartford County AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	117	29.9	23.9	23.9	19.7	2.6
Population by Geography	423,329	24.4	25.8	27.2	21.5	1.3
Housing Units by Geography	183,279	25.7	26.3	28.2	19.5	0.2
Owner-Occupied Units by Geography	88,401	8.3	23.7	36.7	31.3	0.0
Occupied Rental Units by Geography	78,687	42.5	28.9	20.2	8.3	0.1
Vacant Units by Geography	16,191	39.7	28.3	20.3	9.9	1.8
Businesses by Geography	64,736	21.2	23.2	30.0	25.0	0.6
Farms by Geography	1,169	15.5	22.8	35.4	26.3	0.0
Family Distribution by Income Level	100,584	32.0	17.5	18.9	31.6	0.0
Household Distribution by Income Level	167,088	33.8	16.6	15.9	33.7	0.0
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$101,543	Median Housing Value			\$226,437
			Median Gross Rent			\$1,081
			Families Below Poverty Level			11.9%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0% (*)</i> <i>The NA category consists of geographies that have not been assigned an income classification.</i>						

The median family income in the Hartford County AA was \$101,543. Family distribution by income level was 32.0 percent of families in the AA were low-income, 17.5 percent for moderate-income, 18.9 percent for middle-income, and 31.6 percent for upper-income. Within the AA, 11.9 percent of families were below poverty level.

The median housing value in the Hartford County AA is \$226,437. The maximum income level for the low-income level is \$50,772, indicating the average home value is 4.5 times larger than

the maximum low- income level. The maximum income level for moderate-income borrowers is \$81,234, making the median housing value 2.8 times the maximum moderate-income level.

Competition within the AAs is strong with the market dominated by large national and regional financial institutions. According to the Federal Deposit Insurance Corporation's Deposit Market Share Report as of June 30, 2023, out of 25 institutions operating in Hartford County, CCB ranked 17<sup>th</sup> in deposit market share with 0.3 percent of the market. The top five financial institutions had a combined deposit market share of 76.2 percent, and include Bank of America, N.A. (45.4 percent market share), Manufacturers and Traders Trust Company Bank (11.9 percent market share), Webster Bank, N.A. (8.5 percent market share), TD Bank, N.A. (6.8 percent market share), and KeyBank, N.A. (3.5 percent market share).

Based on 2022 Peer Small Business Data, 125 lenders originated loans in the Hartford County AA. The top five lenders in the AA had a combined total market share of 59.9 percent and included American Express National Bank (23.3 percent market share), JP Morgan Chase Bank, N.A. (10.5 percent market share), Bank of America (9.7 percent market share), US Bank, N.A. (9.5 percent market share), and Capital One, N.A. (7.0 percent market share).

According to the 2023 Business Demographic Data, there were a total of 65,905 businesses in the Hartford County AA. The service industry was the primary industry in the AA, accounting for 36.0 percent of all businesses. Approximately 21.2 percent of the businesses were located in low-income, 23.2 percent in moderate-income geographies, 30.0 percent in middle-income geographies, and 25.0 percent in upper-income geographies.

The top employers in Hartford County were Hartford HealthCare, Pratt & Whitney/United Technologies, University of Connecticut, The Travelers Cos. Inc., Hartford Financial Services Group, Trinity Health – New England, and UnitedHealthcare.

As of December 2023, the BLS reported the unemployment rate for Hartford County was 4.1 percent, which is comparable to the 4.0 percent BLS reported unemployment rate for Connecticut. Both are slightly below the national unemployment rate of 3.7 percent.

The OCC obtained data from a community contact with community-based development initiatives within the Hartford County AA. The community contact indicated that access to affordable childcare remains a primary need in the community. Additionally, the community contact noted that there is a particular need for credit access for smaller non-profit organizations. The community contact observed that it is difficult to motivate bankers to serve on the boards of small non-profit organizations. The community contact recommended that banks provide more hands-on assistance with how to repair and build credit as part of their financial education efforts.

## **Scope of Evaluation in Connecticut**

The rating for Connecticut is based on full-scope reviews of the Fairfield and Hartford Non-MSA AAs. CCB's branches and ATMs are located within the AAs, and a significant portion of the bank's lending and CD activities are centered there.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT**

### **LENDING TEST**

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

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

#### **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the state.

##### ***Small Loans to Businesses***

Refer to Table Q in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

Overall, the geographic distribution of small business loans was excellent.

During the 2021 evaluation period, the proportion of bank loans made in low-income CTs was well below the proportion of small businesses and aggregate lending in those geographies. The proportion of bank loans made in moderate-income CTs exceeded the proportion of small businesses and the aggregate lending in those geographies.

During the 2022-2023 evaluation period, the proportion of bank loans made in low-income CTs was near to the proportion of small businesses and exceeded the aggregate lending in those geographies. The proportion of bank loans made in moderate-income CTs exceeded the proportion of small businesses and aggregate lending in those geographies.

The bank's level of small loans to businesses in the Hartford County AA was not sufficient to provide a meaningful analysis.

##### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans. The analysis did not identify any unexplained, conspicuous gaps.

#### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to businesses of different sizes.

##### ***Small Loans to Businesses***

Refer to Table R in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations of small loans to businesses.

Overall, the borrower distribution of loans to businesses was reasonable.

During the 2021 evaluation period, the proportion of bank loans to small businesses was significantly below the proportion of small businesses and the aggregate data. The assessment of CCB's small business lending performance considered the impact of loans to businesses with unavailable revenue data. During 2021, CCB actively participated in the PPP, launched in response to the COVID-19 pandemic. During 2021, the bank originated 245 PPP loans totaling \$26.1 million within its AA. For PPP loans, banks were not required to collect, consider, or report gross annual reviews for PPP business loan applicants. Consequently, over the 2021 evaluation period, CCB reported businesses loan data with unavailable borrower revenue information for the majority of its small business loans.

During the 2022-2023 evaluation period, the proportion of loans to small businesses was significantly below the proportion of small businesses and the aggregate data. The OCC accounted for the composition of lenders in the aggregate distribution as part of its analysis. There was strong competition in the market from large lenders such as American Express National Bank, JP Morgan Chase Bank, Bank of America, Citibank, and Capital One. These banks make up 71.2 percent by number of loans and 40.9 percent by outstanding balance. The bank also had a small business market share of 0.1 percent.

The bank's level of small loans to businesses in the Hartford County AA was not sufficient to provide a meaningful analysis

### **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 Community Development Test in the state of Connecticut is rated Outstanding.

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs. CCB participated in fewer CD activities in the Hartford County AA than the Fairfield County AA, which is reasonable given the bank has just one branch located in Hartford County.

### Number and Amount of Community Development Loans

CCB provided an excellent level of CD lending within its Fairfield County AA. CCB originated 24 loans totaling \$31.4 million, or 47.7 percent of tier 1 capital, in qualified activity during the evaluation period. Some of the larger CD loans included the following:

- CCB originated a line of credit each year of the evaluation period, totaling \$12.0 million, to provide transportation services to low- and moderate-income CTs in Fairfield County.
- CCB committed to a total of \$3.4 million in affordable housing related loans over the evaluation period, including a commitment of \$900,000 to Habitat for Humanity to build affordable homes for low-income families and a commitment of \$2.5 million to the Housing Development Fund. The Housing Development Fund provides down payment assistance to low- to moderate-income qualified first-time homebuyers as well as homeowner counseling services.
- CCB originated \$600,000 in loans over the evaluation period to a charter school that works to keep students in impoverished and underserved communities in school until they graduate from high school.
- CCB committed to a total of \$2.0 million to the Housatonic Area Regional Transit District, which operates fixed route bus services for predominantly low- and moderate-income patrons and provides discounted and on demand services for individuals with disabilities and seniors.

A majority of the bank's CD lending benefitted the Fairfield County AA. CCB originated 20 loans, totaling \$25.6 million, in the Fairfield County AA that met the regulatory definition of CD. Proceeds of the CD loans were primarily used to support affordable housing and community services, such as transportation, health, and educational services. CCB also provided funding for three loans, totaling \$4.5 million in qualified CD activity, outside of its AA but in the regional area. In addition, CCB originated four SBA loans totaling \$7.1 million in qualified CD activity.

### Number and Amount of Qualified Investments

CCB made an adequate level of qualified CD investments, donations, and grants during the evaluation period. CCB funded two qualified investments totaling \$499,000, or 0.8 percent of tier 1 capital as of December 31, 2023. The bank made one investment of \$249,000 to a minority-owned institution and one investment of \$250,000 to a Community Development



Financial Institution (CDFI). The minority-owned institution did not directly benefit customers in the bank's AAs but was qualified as it promotes economic development by providing banking services to low- to moderate-income individuals and families in the communities in which it operates. The CDFI was a credit union that also focuses on providing banking services to low- and moderate-income individuals and families nationwide.

CCB also funded 178 qualified donations and grants totaling \$159,437 during the evaluation period. Donations and grants that benefitted the Fairfield County AA totaled \$80,539, while those that benefitted the Hartford County AA totaled \$3,237. Additionally, one charitable contribution, totaling \$250, benefitted both the Fairfield and Hartford County areas. CCB also made \$75,023 in donations and grants that benefitted the broader statewide area of Connecticut. The investments were made to organizations that provided needed community services in the bank's AAs and state of Connecticut, including providing affordable housing to low- and moderate-income families, coaching and training for homeless veterans, and funding a food pantry.

### **Extent to Which the Bank Provides Community Development Services**

CCB provided an adequate level of CD services in its AAs. Bank employees and board members provided 51 services for a total of 1,023 hours to organizations that supported qualified CD activities. Bank employees effectively used their expertise and work experience to benefit the AAs, such as a Portfolio Manager at the bank completing a total of 129 hours of service for an organization with an income tax assistance program. Members of the bank's senior management team also made contributions to the AAs by serving on the boards of several programs which benefit low- and moderate-income individuals and families in the AAs. Several CCB Branch Managers offered qualified services by providing financial expertise and conducting financial literacy seminars and small business workshops located in low- and moderate-income CTs.

## Appendix A: Scope of Examination

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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 metropolitan and nonmetropolitan areas 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”).

<b>Time Period Reviewed:</b>	January 1, 2021 – December 31, 2023	
<b>Bank Products Reviewed:</b>	Small business loans CD loans, qualified investments, CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not applicable	Not applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Connecticut</b>		
Fairfield County AA	Full Scope	Fairfield County
Hartford County AA	Full Scope	Hartford County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS CCB			
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>CD Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
CCB	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

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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 investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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.

**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 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 multi-state 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state 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.

**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

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### 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.



Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
2021 Fairfield County AA	277	38,602	95.8	25,514	14.2	8.7	12.8	20.8	22.4	20.0	20.1	15.5	22.5	45.0	53.4	44.8	0.0	0.0	0.0
2021 Hartford County AA	12	1,380	4.2	12,768	24.2	25.0	21.4	21.2	25.0	22.1	25.3	8.3	26.0	28.7	41.7	30.0	0.5	0.0	0.5
<b>Total</b>	<b>289</b>	<b>39,982</b>	<b>100.0</b>	<b>38,282</b>	<b>17.6</b>	<b>9.3</b>	<b>15.7</b>	<b>20.9</b>	<b>22.5</b>	<b>20.7</b>	<b>21.8</b>	<b>15.2</b>	<b>23.6</b>	<b>39.5</b>	<b>52.9</b>	<b>39.9</b>	<b>0.2</b>	<b>0.0</b>	<b>0.2</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
2022-2023 Fairfield County AA	73	21,557	100.0	21,662	13.8	13.7	9.0	24.7	32.9	20.7	15.0	13.7	26.9	46.2	39.7	43.0	0.2	0.0	0.4
2022-2023 Hartford County AA	0	0	0.0	10,737	21.2	0.0	8.6	23.2	0.0	17.2	30.0	0.0	44.6	25.0	0.0	28.9	0.6	0.0	0.8
<b>Total</b>	<b>73</b>	<b>21,557</b>	<b>100.0</b>	<b>32,399</b>	<b>16.3</b>	<b>13.7</b>	<b>8.8</b>	<b>24.2</b>	<b>32.9</b>	<b>19.3</b>	<b>20.1</b>	<b>13.7</b>	<b>34.0</b>	<b>39.1</b>	<b>39.7</b>	<b>37.3</b>	<b>0.3</b>	<b>0.0</b>	<b>0.5</b>

Source: 2023 D&B Data; 01/01/2022 - 12/23/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2021 Fairfield County AA	277	38,602	95.8	25,514	90.3	5.1	43.7	3.5	10.1	6.2	84.8
2021 Hartford County AA	12	1,380	4.2	12,768	87.2	0.0	43.8	4.0	16.7	8.9	83.3
<b>Total</b>	<b>289</b>	<b>39,982</b>	<b>100.0</b>	<b>38,282</b>	<b>89.2</b>	<b>4.8</b>	<b>43.7</b>	<b>3.7</b>	<b>10.4</b>	<b>7.1</b>	<b>84.8</b>
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>											

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022-2023</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Fairfield County AA	73	21,557	100.0	21,662	92.2	19.2	52.8	2.6	80.8	5.2	0.0
22-23 Hartford County AA	--	--	--	10,737	89.9	--	51.0	3.0	--	7.2	--
<b>Total</b>	<b>73</b>	<b>21,557</b>	<b>100.0</b>	<b>32,399</b>	<b>91.4</b>	<b>19.2</b>	<b>52.1</b>	<b>2.7</b>	<b>80.8</b>	<b>5.8</b>	<b>0.0</b>
<i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/23/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>											