

FAIRFIELD COUNTY BANK CRA POLICY 2025

- I. **Intent:** Fairfield County Bank is committed to serving the credit needs of the community in which we do business. It is our policy to help meet the credit needs of all creditworthy segments of our local communities, including Majority Minority income borrowers. We believe that doing so is basic to good business practice, and to the Bank's own long-term vitality.
- II. **Community Delineation:** Factors used to determine our geographic community includes branch locations, geographic obstacles, and propensity for customers to travel, etc. This delineation of assessment area does not reflect any illegal discrimination, nor does it exclude Low, Moderate, or Majority Minority income communities. Our delineated lending area previously included all Cities and Towns within the Western Connecticut Council of Government and the Metropolitan Council of Government. As of 2024, revisions initiated by the State of Connecticut and subsequently approved by the US Census Bureau, retired the eight County format in favor of nine Councils of Governments (COGS), also referred to as Regions. Currently under injunction, with a compliance date to be determined, the CRA Modernization ACT is retiring the Assessment Area definition. As the revision to a Facility Based Assessment Area, defined with the pending revisions, appears unchanged as an area where the main office, branches, and deposit-taking remote service facilities are located, aligns with the Banks footprint nearly to the entirety, except as stated in Section III below, the terminology of a Facility Based Assessment Area is utilized throughout the CRA Policy and Plan.
- III. The restructuring of the State to COG Regions has redefined our previous Assessment Area of Fairfield County to now consist of two Regions consisting of the following Towns/Cities:
 1. Western Connecticut Planning Region: Bethel, Bridgewater, Brookfield, Danbury, Darien, Greenwich, New Canaan, New Fairfield, New Milford, Newtown, Norwalk, Redding, Ridgefield, Stamford, Westport, Wilton, and Weston.
 2. Greater Bridgeport Planning Region: Bridgeport, Easton, Fairfield, Monroe, Stratford, and Trumbull.

In reformatting to COG Regions, the Bank now includes Bridgewater and New Milford within Western CT, but the town of Shelton CT has been aligned with the Naugatuck Valley Region.
- IV. **Community Reinvestment Notice:** The Community Reinvestment Act Notice is located in the lobby of all of our branches. This statement is available to anyone who requests it.
- V. **CRA Public File:** The Bank shall maintain a CRA Public File on our Website, in digital format, providing required information and documentation available for public access. The CRA Public File is updated as necessary, at least an annual basis, unless otherwise indicated below. The CRA Public File shall contain the following:

- CRA Comments – All written complaints from the public relating to the Bank’s CRA performance and responses to them for the current and preceding two calendar years (except those that reflect adversely on the good name or reputation of any persons other than the Bank). If no such comments exist, the CRA Officer will include a signed written statement that no public comments were received during the prior year, undated quarterly.
- A copy of the public disclosure section of the Bank’s most recent regulatory Community Reinvestment Act Performance Evaluation (PE).
- A list of the Bank’s branches, their street addresses, complete physical addresses and census tract numbers updated quarterly.
- A list of the Bank’s branches opened or closed during the current year and each of the prior two calendar years, including their street addresses, complete physical addresses and census tract number updated quarterly.
- A list of services (including hours of operation, available loan and deposit products, and transaction fees) generally offered and the Bank’s branches and descriptions of material differences in the availability or cost of services of particular branches updated quarterly.
- The Bank’s CRA disclosure statements for the prior two calendar years (Small Business/Farm) are available on the Federal Financial Institution Examination Council’s website at www.ffiec.gov/cra.
- Notification of HMDA data about residential mortgage lending is available online for review at the Consumer Financial Protection Bureau’s Website www.consumerfinance.gov/hmda.

If applicable, when the Bank exercises its elective under the regulation, for the most recent exam, the number and amount of consumer loans made to the four income categories of borrowers and geographies (Low, Moderate, Majority Minority, Middle, and Upper), and the number and amount located inside and outside of the Facility Based Assessment Area(s). The Bank chooses not to exercise this option.

VI. Ascertainment of Community Credit Needs: Determining the credit needs of our communities is an ongoing process involving the Board of Directors, Senior Officers, Loan Officers and Branch Officers. It is the policy of this bank to make an active effort to determine the credit needs of our community, including those of Low and Moderate, and Majority Minority individuals.

- **Incorporators:** Comprised of various members of our local communities, this group augment executive management’s communication with business and other segments of the areas we serve. Such members are in a unique position to provide information about the credit needs of their own communities.
- **Meetings with Community Organizations:** The Bank’s Officers, Directors and Staff meet with many local organizations and business associations. This enhances the assessment process of the community needs and the opportunity to provide loan products and services to meet those needs. Community organizations include Bridgeport Rescue Mission, Building Neighborhoods

Together, Housatonic Community College Foundation, and Housing Development Fund.

- **Investments and Charitable Contributions:** We recognize that CRA's primary focus is on lending, and we are always looking for local donations or contributions that will contribute to the betterment of the communities we serve and further the goal of CRA.

VII. Assignment of Responsibility: The Bank has assigned responsibilities for monitoring and performing assignments and tasks associated with this Policy.

- A. **Role of the Board of Directors:** The Board of Directors appoints a CRA Officer annually. The Board, at least annually, reviews our CRA Policy and Plan and formally adopts it. It also stays informed of our CRA performance through periodic evaluation of internal and agency examination reports. The Board holds Bank personnel accountable for the bank's CRA performance.
- B. **CRA Officer:** The CRA Officer is responsible for administering the program described in this policy and for reporting to management and the Board of Directors on its implementation.
 - The CRA Officer conducts an annual review of our CRA Plan performance prior to the annual submission of our CRA Policy and Plan to the Board.
 - The CRA Officer assures regulatory compliance for Federal and State CRA regulations.
 - The CRA Officer will report on CRA performance and community development activities to the Board of Directors periodically.
 - The CRA Officer is the chair of the CRA Committee.
- C. **CRA Committee:** The CRA committee includes the Chief Executive Officer, the President, CRA Officer, Senior Compliance, Retail Lending, Commercial Lending, Retail Banking, Finance, Marketing, and any other Officers as deemed appropriate by Senior Management. The CRA committee will:
 - Develop our CRA Policy and annual Plan.
 - Oversee CRA related Training.
 - Monitor CRA performance.
 - Make recommendations for improvement.
 - Review complaints, prepare responses, and oversee actions taken if appropriate.
 - Meet quarterly.

VIII. **Technical Regulatory Compliance:** The Bank will meet all procedural requirements of CRA and related regulations, including:

- Developing an appropriate CRA Policy and assuring it is available to the public.
- Posting the Community Reinvestment Notice in all Branches.
- Maintaining current website information of the Banks CRA Public File and quarterly updating as listed in Section 5, CRA Public File.
- Submission of annual CRA data to regulatory agency
- Submission of annual HMDA data to regulatory agency
- Maintaining appropriate record retention policies

IX. **Audit and Compliance Reviews:** The Bank's CRA and HMDA data will be reviewed within 30 days of each quarter end. In addition, the Bank will conduct an audit of the Bank's CRA and HMDA data at year-end and prior to the March 1st filing deadline. The Bank engages independent third parties to conduct reviews as deemed necessary.

Upon completion of the annual audit, the CRA committee will review the results and determine if the Bank is in compliance with the lending requirements of the Community Reinvestment Act. A review of the lending within the Bank's Facility Based Assessment Area is also conducted to determine if the delineation of the Bank's community is correctly stated.

Review of the Bank's Reasonably Expected Market Area (REMA) is performed by members of the CRA Committee to monitor the Bank's lending footprint within our designated Assessment Areas of Western CT and the Greater Bridgeport Planning Regions as well as outside of both our Assessment Areas and out of the State of Connecticut and the influences contributing to marketing outreach via radio, television, social media, and mailers. Findings are discussed at CRA Committee meetings for any further action.

CRA Sunshine Requirements: The Bank shall comply with the CRA Sunshine Requirements by ensuring that certain agreements be available to the public and the appropriate agencies and to file annual reports concerning the agreements with the appropriate agency. The CRA Officer and CRA committee shall annually determine whether the institution has entered into any covered agreements with nongovernmental entities or persons (NGEP) during the previous calendar year.

Agreements requiring this action must meet all of the following criteria:

- i. The agreement is in writing.
- ii. The parties to the agreement include:
 1. one or more depository institutions or affiliates of an insured depository institution; and
 2. one or more non-governmental entities or persons.
- iii. The agreement provides for the insured depository institution or any affiliate to:

1. Provide to one or more individuals or entities (whether or not parties to the agreement) cash payments, grants, or other consideration (except loans) that have an aggregate value of more than \$10,000 in any calendar year; or
 2. Make to one or more individuals or entities (whether or not parties to the agreement) loans that have an aggregate principal amount of more than \$50,000 in any calendar year.
- iv. The agreement is made pursuant to, or in connection with, the fulfillment of the CRA.
 - v. The agreement is with a NGEP that has had a CRA communication prior to entering into the agreement.

A covered agreement does not include:

- (1) Any individual loan that is secured by real estate; or
- (2) Any specific contract or commitment for a loan or extension of credit to an individual, business, farm, or other entity, or group of entities if:
 - a. The funds are loaned at rates that are not substantially below market rates; and
 - b. The loan application or other loan documentation does not indicate that the borrower intends or is authorized to use borrowed funds to make a loan or extension of credit to one or more third parties.

X. **Training:** Bank employees with CRA responsibilities are required to participate in CRA related compliance training upon employment with the Bank and on at least an annual basis thereafter. Those employees include, but are not limited to, commercial loan officers, retail mortgage originators, the CRA officer, the compliance department and employees responsible for the input of the CRA and HMDA data into the software. CRA training may consist of classroom style training, web based seminars, or online tutorials.

XI. **CRA Performance Measurement:** To monitor its own lending performance and to assist examiners in their evaluation, the bank will maintain documentation regarding the following:

A. Assessment Area

- Appropriateness of the assessment area delineation.
- The proportion of the bank's loans within its assessment area
- The proportion of the bank's loans in low, moderate, middle and upper income areas.
- The distribution of loans to low, moderate, middle and upper income borrowers.
- The dispersion of the bank's loans in its assessment area

B. CRA Investment

- The dollar amount of all qualified investments made.

- A description of the community needs addressed by the bank's investments.

C. CRA Service Efforts

- A list of all financial products and services provided by the bank.
- A list of branch offices and hours of operation.
- A list of any branch openings, closings, or change to hours of operation.

D. CRA Lending Test Performance

- Evaluate Bank's CRA and HMDA lending.
- Utilize third-party vendor: The Bank utilizes GeoDataVision to perform analytics to help the Bank determine its performance and analyze results.

COMMUNITY REINVESTMENT ACT PLAN 2025

Fairfield County Bank, founded in 1871 has been committed to helping build and maintain the economic and social vitality of the communities we serve for over 150 years, by offering a comprehensive range of personal and business banking products and services. Fairfield County Bank continues these efforts to foster economic revitalization and growth including ongoing contact with community development groups, community activists, municipal officials, local business owners and Low, Moderate, Majority Minority income members of the community. These efforts are intended to help identify the banking needs of all community residents.

The Bank's current Facility Based Assessment Area includes all of the Cities and Towns in in both Western Connecticut and the Greater Bridgeport Planning Regions where the main office, branches, and deposit-taking remote service facilities are located.

As defined in our Policy, our Facility Based Assessment Area consists of the following:

Western Connecticut Planning Region: Bethel, Bridgewater, Brookfield, Danbury, Darien, Greenwich, New Canaan, New Fairfield, New Milford, Newtown, Norwalk, Redding, Ridgefield, Stamford, Westport, Wilton, and Weston.

Greater Bridgeport Planning Region: Bridgeport, Easton, Fairfield, Monroe, Stratford, and Trumbull.

Meeting unmet credit and consumer banking needs in the local community

The Bank provides funding to the Family Loan Program, a division of Catholic Charities of Danbury, of which an Officer of the Bank is a Board member, providing small loans to unbankable individuals so they may purchase or repair a car to get to work, continue their education, or assistance with a security deposit for rental housing. In addition to financial assistance, The Catholic Charities Family Loan Program provides Financial Education and Budget Counseling to support self-sufficiency, ensure successful loan repayment, and help build positive credit. These services are available to anyone in need of financial guidance.

The Bank donates to many community entities for the benefit of all the communities it serves, such as Near and Far Aid Association, Center for Empowerment and Education (formerly the Women's Center of Greater Danbury), the Jericho Partnership, Ability Beyond Disability, Star, Inc, and Housatonic Community College Foundation.

The Bank maintains a relationship with Bringing Neighborhoods Together (formerly known as Bridgeport Neighborhood Trust), a community group providing extensive consumer support in financial literacy guidance on renting, budgeting, and first-time homebuyer educational support of which the Bank is an active participant as a sponsor or speaker.

The Bank is an active participant with Junior Achievement of Greater Fairfield County, an organization that is dedicated to inspiring and preparing young people to succeed, through programs which focus on financial literacy, work and career readiness, and entrepreneurship. As of 2025, the Bank has requested that Junior Achievement match us with schools within our Assessment Area in order to keep our involvement directly with the communities that we serve.

Additionally, the Banzai! Educational guidance program has been provided to numerous elementary, middle, and high schools in Fairfield County providing financial education guidance in an interactive video format. Since inception, the program was offered to thirty-seven (37) elementary, middle and high schools throughout our two COG Regions, and as of year-end 2024, twenty-three (23) schools have accessed the program curriculum.

During 2023, the State of Connecticut enacted an education requirement into law, beginning with the class of 2027, all students take a personal finance class before graduation. Banzai and the Bank's active participation in reaching out to schools, offering in-class (and on-line) financial information on banking, money management, and mobile applications, provides the next generations and teachers with tools toward stronger financial knowledge.

The Bank also maintains a close relationship with Housing Development Fund (HDF) which provides:

HUD-Certified Counseling including financial education to first-time homebuyers. Education consists of budgeting, understanding the lending process, documentation for contracting and acquiring a property, as well as homeownership responsibilities of repayment and property management.

The SmartMove second mortgage product at a low interest rate that can be used for downpayment and qualified closing cost assistance up to 25% of the purchase price. The first mortgage must be with Fairfield County Bank.

The Live Where You Work CT program loans with at a 0% interest rate to help Connecticut homebuyers buy their first home in the same town where they work. This product can be layered with other downpayment assistance programs.

Distribution of banking services among branches and satellite devices located in low-income neighborhoods.

Fairfield County Bank operates 17 full-service branch offices, opening our newest full service branch on November 17, 2023, at 26 Mill Plain Rd, Danbury, CT. Effective July 5, 2024, the branch located at 374 Main St., Ridgefield, CT was merged with the branch located directly in back at 3 Governor St, Ridgefield, CT. The ATM at 374 Main St remains available 24/7 and 3 Governor St. now offers full service banking in addition to a drive-up.

The Bank currently operates twelve standalone ATMs throughout the Western and Greater Bridgeport Planning Regions and will be adding a thirteenth standalone ATM in April of this year. Branch hours of operation are most commonly Monday through Friday, with some branches open Saturdays. Drive-up services are available at all but three branch locations.

Fairfield County Bank offers a comprehensive list of financial services: residential mortgages, home equity, consumer, small business loans, commercial loans, small business banking and business banking services, personal checking, and savings accounts. Investment services offered through Osiac Inc. are also available to meet individual customer needs through Fairfield County Financial Services.

The Bank is a member of the Visa, CIRRUS, NYCE, providing customers access to their accounts 24 hours a day, seven days a week, at millions of merchants and thousands of participating ATMs worldwide.

Our online banking and mobile banking solutions provides customers with 24-hour access to their accounts. Online banking functionality enables customers to view accounts and balances, initiate transfers, pay bills, apply for loans, activate and deactivate their debit cards for protection, initiate profile updates, set-up transaction alerts and notifications, initiate stop payments and disputes, receive updates and additional offers with targeted banner communications, contact or message customer service, locate branches and ATMS, and even customize their settings and digital interface. Mobile banking further enables customers to remotely deposit checks, use their digital device for point-of-sale transactions (via mobile wallets including Apple Pay and Samsung Pay), and leverage biometrics for authentication access. Additional online and mobile services include providing customers to credit scores and credit history, including information on how to better manage their credit; ability for customers to aggregate all of their financial services, including non-Fairfield County Bank accounts, to enable comprehensive budgeting and financial management; and access to person-to-person payment with integration of Zelle.

To further support our customers' access to digital solutions, dedicated Electronic Banking call center staff are available during business hours and back up after-hours call center support is provided through our processor, ensuring 24 hour phone access support. The Electronic Banking staff members provide direct support to customers for enrollment, product education, password resets, any issues identification and/or resolutions and any other electronic banking inquiry.

We have also integrated a fraud protection tool, Verafin, financial crime management service developing an Elder Abuse alert to detect when an individual is potentially the victim of financial elder abuse. Most victims of financial elder abuse are elderly individuals or disabled individuals, usually have a fixed income as well as regular monthly/weekly spending. Often, they rely on another family member, friend or hired professional. For example, an elderly person may have some savings, receive monthly pension checks, and over the course of the month make purchases for groceries,

medications/healthcare expenses, and perhaps spend some money on gifts for their loved ones. Typically, elderly or disabled individuals don't spend a lot compared to other customers.

One of the strongest indicators of financial elder abuse is seeing increased spending and the customer's account begins to be depleted. To detect elder abuse and increased spending, Verafin looks at things such as: is the account balance decreasing, have new individuals been granted access to the account, have the transactions changed, i.e., transferring money out of the account or using online banking.

The State of Connecticut passed PA 23-161 – An Act Concerning Financial Exploitation of Senior Citizens that allows to us place holds on suspicious transactions, providing certain conditions are met. While participation is voluntary, we have chosen to develop an Elder Abuse Policy and Trusted Contact forms to comply with this legislation. We have also implemented a formalized a fraud department to help detect fraud and protect customers. Additionally, employees are trained on fraud detection and prevention.

All digital services are available via the Internet 24 hours a day seven days a week from anywhere.

Fairfield County Bank is an active member in the communities it serves. The Board of Corporators and Board of Directors of the Bank are comprised of members residing in the communities in which the Bank does business. They represent a broad cross section of the business and professional community. Corporators, Directors, Officers and staff members are involved in on-going efforts to ascertain the needs of the community through contacts with community groups, non-profit housing development corporations, local government officials, real estate brokers and developers.

A CRA Committee comprised of members of the Board of Directors, Senior Management and staff personnel meet regularly throughout the year to review the Bank's CRA objectives and performance.

Information Regarding Branch Offices:

Bridgeport, Danbury, Fairfield, Norwalk and Stamford are the five cities containing Low, Moderate, and Majority Minority income census tracts in which the Bank has branch offices.

Branch	2024 Tract	2024 Inc Tract
255 Tunxis Hill Fairfield CT	0613.00	Middle
69 Wall St Norwalk CT	0437.00	Moderate

121 New Canaan Ave Norwalk CT	0430.00	Middle
850 E Main St Stamford CT	0217.01	Low
1089 Madison Ave Bridgeport CT	0722.00	Moderate
114 Federal Rd Danbury CT	2114.00	Middle
714 Post Rd Darien CT	0302.00	Upper
2000 Post Rd, Suite 103 Fairfield CT	0616.00	Upper
26 Chestnut Hill Rd Norwalk CT	0425.00	Upper
150 Danbury Rd Ridgefield CT	2453.00	Upper
3 Governor St Ridgefield CT	2453.00	Upper
2 McKinley St Rowayton CT	0446.00	Upper
190 Weston Rd Weston CT	0551.00	Upper
20 Compo Rd So Westport CT	0505.00	Upper
941 Danbury Rd Wilton CT	0451.02	Upper
190 Old Ridgefield Rd Wilton CT	0452.00	Upper

26 Mill Plain Rd
Suite 1A
Danbury, CT 06811

2108.00

Middle

The Bank believes that its reputation for excellent personal customer service, including service to Low, Moderate, and Majority Minority income individuals and groups and will continue to enhance the distribution of its products and services to all members of its communities.

Fairfield County Bank offers banking services on a non-discriminatory basis.

Fairfield County Bank affirmatively solicits credit applications from all segments of its community, including Majority Minority income neighborhoods. Loan decisions are made in accordance with written policies of the Bank and Secondary Market Investors and are based on an analysis of the lending risk associated with a particular loan type, credit profile, debt-to-income ratios of the applicant, loan-to-value, reserves and other factors. Loans that are declined are reviewed a second time by management and reported monthly to the Board of Directors. Fairfield County Bank will continue to extend credit consistent with safe and sound banking practices and consistent with all provisions of the anti-discrimination laws and Fair Lending regulations.

An internal audit conducted annually ensures that lending personnel are complying with all provisions of the anti-discrimination laws and regulations, including the Equal Credit Opportunity Act, the Fair Housing Act, and the Home Mortgage Disclosure Act. In addition, the Bank performs a self-assessment of CRA performance using both internal and external resources.

Fairfield County Bank's commitment to extend credit for housing, small business and consumer purposes in Low, Moderate, and Majority Minority income neighborhoods.

Loan Originators, branch managers and staff personnel are dedicated to providing all customers with the highest level of personal service. In 2024, the Bank added a 4th loan officer for more comprehensive branch coverage and partnership with a home base in our Bridgeport LMI region.

The Bank has an active and successful small business-lending program, with a team of lenders ready to help small and mid-size businesses with a wide range of competitive business loans and deposit services.

The Bank participates in government insured, guaranteed, or subsidized loan programs for housing, small business or small farms including:

Mortgage Programs - Fairfield County Bank offers comprehensive home financing options including a variety of mortgage programs targeted to qualified low-and moderate-income individuals in the Western CT and Greater Bridgeport Regions in Connecticut.

They are as follows:

- **Connecticut Housing Finance Authority (CHFA)** - CHFA loans have flexible first mortgage qualifying guidelines with low fixed rates. CHFA also offers qualified borrowers, a Down Payment Assistance Program (DAP) at a low interest rate and the Time To Own (TTO) Forgivable Down Payment Assistance Program at a 0% interest rate.
- **Housing Development Fund (HDF)** – HDF is a HUD-Certified housing counseling service offering financial education to first-time homebuyers. Fairfield County Bank is a long time sponsor of HDF's SmartMove program which provides both financial education and post-closing counseling to support first-time homebuyers with purchasing homes. Qualified borrowers receive up to 25% in downpayment and qualified closing cost assistance in the form of a fixed rate second mortgage. Additional loans such as the Live Where You Work CT and CT Forever Home are also available to qualified buyers furthering the support in downpayment assistance.
- **First-Time Home Buyer Program** – Fairfield County Bank offers a fixed rate mortgage program for first-time buyers at a reduced rate with reduced closing fees for the purchase of a primary residence in our Low, Moderate, and Majority Minority income census tract areas in Western CT and Greater Bridgeport, CT Regions.
- **Closing Costs Credit** - Within our Assessment Area, the bank offers a \$650 closing cost credit for borrowers purchasing or refinancing properties in low or moderate-income census tracts.
- **Fannie Mae's HomeReady Program** – Available to qualified applicants, for both First-Time Homebuyers and Refinance transactions, this program may provide reduced rates or lower Private Mortgage Insurance for loan-to-values over 90.00% to 97%. Any Fannie Mae eligible purchase transaction loan may have a Community Second up to the maximum 105 percent CLTV.
- The Bank also has relationships with other Investors to provide the widest possible home financing options to our clients.
- **Down payment assistance programs** with CHFA DAP and HDF Smart Move programs at below market rates and up to 105% Combined Loan-to-Value financing. CHFA also offers the Time-To-Own forgivable down payment assistance program that provides qualified borrowers purchasing up to 20% toward down payment and up to 5% toward closing costs. Loan amounts are based on Sales Price Limits and Area Median Income (AMI).

In addition, we offer:

- **Fixed Rate Mortgages**
- **Adjustable-Rate Mortgages**
- **Jumbo Mortgages**
- **Investment Property Mortgages**
- **Home Equity Line of Credit Mortgages**

Business Loan Programs

- **Small Business Loan or Line of Credit** – This business credit product is available specifically for smaller businesses with credit needs of up to \$250,000.
- **SBA Lender** - The Bank offers SBA Loan products to help small business expand or to take advantage of special opportunities. FCB has made the decision to better utilize the SBA programs. With a transition to Abrigo Sageworks as the commercial Loan Origination System, we are now able to offer streamlined applications for 7a SBA loans.
- **Commercial Term Loans** - For facility expansion, equipment purchase, working capital or other growth plans that require significant financing, a term loan can provide the capital need with an extended period of payment.
- **Commercial Revolving Lines of Credit** - A Line of Credit from Fairfield County bank helps assure business liquidity.
- **Commercial Construction Loans** - We offer construction loans to facilitate various types of construction projects including single family, speculative, and contract home construction, multi-family, condominiums and townhouses, land development, commercial real estate, and residential subdivisions.
- **Commercial Mortgages** - Permanent and construction/permanent loans are available to help acquire, build, renovate or expand commercial property.
- **Business Overdraft Protection** - an Overdraft Protection Line of Credit.

Consumer Loans – The Bank offers a full range of secured and unsecured loans for individuals.

- **Home Improvement Loans**
- **Personal Loans**
- **Overdraft Protection**
- **Savings Account/CD Secured Loans**

Describe the activities the Bank currently conducts and proposes to conduct in the future to ascertain the continuing credit needs of the community, including the efforts to communicate with members of the community regarding the services provided.

Fairfield County Bank has a strong commitment to extend credit to all members of the community, including low-and moderate-income residents and neighborhoods. The Bank has a marketing budget that includes programs to inform all segments of the community of the financial products and services offered, including those that have been developed to address identified credit needs.

We promote our CRA events and services in our relationships with numerous groups such as Junior Achievement, the Family and Children's Agency, the Center for Empowerment, previously known as the Women's Center of Greater Danbury, and the Housatonic Community College Foundation, providing CRA qualified and personal volunteer services.

We also promote a "Charity of the Month" program, where employees and members of the public (both customers and non-customers) may vote on a charity to receive an additional \$1,000 of support from the Bank for the year. Employees identify local charities throughout Fairfield County that they are passionate about and actively involved with for consideration in this program. Corresponding with the Charity of the Month, we facilitate 4 donation drives a year, benefitting various organizations.

The Bank may periodically place advertisements describing its services to local radio stations, area cable TV stations, mailer brochures, social network platforms, and its website to advertise products throughout its market area.

Describe marketing and special credit-related programs that the Bank has established and proposes to establish in the future to make members of the community aware of the credit services offered.

- In addition to traditional forms of marketing, the Bank directs first-time homebuyers to Connecticut Housing Finance Authority (CHFA) and Housing Development Fund (HDF) for pre-purchase counseling.
- The Bank provides support by our Mortgage Loan Originators as presenters via Microsoft Teams classes for First-Time Homebuyer Seminars with staff and their community partners. Subsequent interim financial educational seminars have been sponsored and/or participated in by Bank Staff.
- The Bank supports the Family Loan Board, a division of Catholic Charities of Bridgeport. A staff member is on the Board. Family Loan Board provides low and moderate-income families with small dollar and low interest rate loans toward purchasing a vehicle allowing them to continue to work, automotive repairs, and Security Deposits toward rentals.

- Fairfield County Bank launched an online financial wellness program powered by Banzai in 2021. The Bank sponsors 37 schools throughout Fairfield County. Twenty-three of the sponsored schools have enrolled in the program as of February 1, 2025. The school districts include Bridgeport, Danbury, Darien, Norwalk, Regional School District 09, Ridgefield, and Stamford. Nine schools including seven middle and two elementary are located in Bridgeport, four schools including three elementary and one middle are located in Danbury, one high school in Darien, three schools including two elementary schools and one middle are located in Norwalk, one high school located in Redding, one high school located in Ridgefield, and four schools including two elementary, one middle, and one high located in Stamford. The program consists of an online financial wellness program teaching real-world personal finance and is designed to help students navigate financial dilemmas with real-life scenarios.

Describe the manner in which members of the governing board of the Bank participate in formulating policies and reviewing performance with respect to meeting the banking needs of all community residents.

The Board of Directors appoints a CRA Officer annually. The Board reviews our CRA Policy and current CRA Plan, at least annually and formally adopts it. It also stays informed of our CRA performance through periodic evaluation of internal and agency examination reports. The Board will hold Bank personnel accountable for the Bank's CRA performance. The CRA Officer will report on CRA performance and community development activities to the Board of Directors periodically.

Address the bank's participation, including investments, in local community development and redevelopment projects or programs.

The Bank is an active supporter of the Housing Development Fund (HDF) SmartMove program. This program provides down payment assistance to first-time homebuyers at reduced interest rates and requires mortgage financial educational training prior to home purchase.

The Bank actively participates as a Connecticut Housing Finance Authority (CHFA) lender. This organization provides first-time homebuyer preferred financing throughout Connecticut and requires homebuyer counseling as a condition for approval. Loans are in collaboration with Fannie and Freddie programs for qualification purposes. The first mortgages can be offered to qualified borrowers with CHFA's DAP, CHFA's TTO, HDF's SmartMove Second Mortgage Program and/or HDF's Live Where You Work CT.

As a CHFA approved lender, we may also participate in the following Special Programs that offer a discounted rate:

- Home of Your Own (disabled homeowners)
- Homeownership (renters transitioning into a home)
- Military Homeownership (members of US Military)
- Police Homeownership (municipal/state police officers)

- Teachers Mortgage Assistance (teachers in priority or transitional school districts or in subject matter shortage areas or eligible Alliance Districts)

We joined the HDF Multi Family Consortium in June 2023. In 2024, we increased our participation from \$1,000,000.00 to \$1,250,000.00. In 2024, four loans toward financing of low income housing for tenants were originated through the program.

Each HDF project incorporates affordable housing in varying proportions and capacities. Depending on where the project is located, HDF's affordable housing requirement ranges from 40% to 100% of total units. If the property is located in a low or moderate-income neighborhood, a minimum of 40% of the units must be affordable to tenants who earn <80% of HUD's established income guidelines or Federal Financial Institutions Examination Council ("FFIEC") income guidelines. Any units with HUD Section 8 or Housing Choice Vouchers are eligible.

If the Property is not located in a low- or moderate-income neighborhood, then 100% of the units need to be affordable as outlined above. Any units with HUD Section 8 or Housing Choice Vouchers are eligible. Tenants do not pay more than 30% of their income in rent if they pay their own utilities or 35% of their income in rent if the owner pays the unit utilities.

In 2017, the Bank established a relationship with CRA Partners, a national organization powered by the Senior Housing Crime Prevention Foundation (SHCPF) that guarantees banks federally mandated CRA credit through the operation of the turnkey Senior Crimestoppers program providing safe and secure living environments for our nations low to moderate income seniors with a nationwide crime prevention program educating and safeguarding against theft, abuse and neglect. Senior Crimestoppers is funded exclusively by the banking industry in 43 states.

Our original commitment in 2017 was \$1,000,000.00 and in 2021, the amount was increased an additional \$2,000,000.00 toward the Senior Housing Crime Prevention program for an overall seven-year term. This agreement was renewed in 2024 for an additional 7 year term. This has led to the sponsorship of four HUD approved senior facilities; two senior apartments and two nursing home centers. Our outreach has provided strong support and exposure of the Bank toward our CRA goals, while developing relationships with residents and staff.

The Bank has continued an internal "Lunch and Learn", a strategic initiative developed in 2022, in which a group of bi-lingual branch employees will undergo an in-depth training program in Residential Lending led by a member of the Residential Lending Department Team. Those that show an aptitude to discuss and originate mortgage loans will become NMLS certified and paired with Retail Lending Originators to support them in easing the lending questions and process with Borrowers in their preferred language. Additionally, the Branch personnel involved can further our involvement in community groups and neighborhood associations to bring the full scope of the Banks services, in addition to

homeownership, to a wider network in the Western Connecticut and Greater Bridgeport CT Regions.

Fairfield County Bank donates to many worthwhile entities for the benefit of all the communities it serves such as Ability Beyond Disability, Ann's Place, RVNA Health, and the Maritime Aquarium.

The Bank's Board and employees proudly contribute, support, and serve on numerous community organizations in Fairfield County inclusive of Ridgefield Fresh Air Fund, Housatonic Community College Foundation, Habitat for Humanity, The Center for Empowerment and Education, and Catholic Charities Family Loan Board.

We will continue to respond to the needs of the communities we serve.

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