



PUBLIC DISCLOSURE

December 2, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Union Federal Savings & Loan Association
Charter Number 700244

104 North Tremont Street
Kewanee, Illinois 61443

Office of the Comptroller of the Currency

211 Fulton Street
Suite 604
Peoria, Illinois 61602

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 **Outstanding**.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on the lending performance in Illinois and Wisconsin.
- The bank exhibited excellent geographic distribution in both assessment areas (AAs).
- The bank exhibited excellent borrower distribution in both AAs.
- A majority of loans are originated and purchased inside the AAs.
- The loan-to-deposit (LTD) ratio is more than reasonable.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

The quarterly average LTD ratio was 89.5 percent for the 18-month period from September 30, 2019, to December 31, 2023, with a low of 86.4 percent and a high of 95.2 percent.

The bank ranked second out of six similarly situated Federal Deposit Insurance Corporation (FDIC) insured institutions that compete with the bank for deposits in the AAs. The comparable institutions range in total asset size from \$150.2 million to \$484.5 million and reported quarterly average LTD ratios from 47.33 percent to 101.13 percent.

Lending in Assessment Area

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

The bank originated and purchased 81.8 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	224	81.8	50	18.2	274	45,046	79.9	11,350	20.1	56,396
Total	224	81.8	50	18.2	274	45,046	79.9	11,350	20.1	56,396

Source: HMDA data from 1/1/2021 to 12/31/2023.

Description of Institution

Union Federal Savings & Loan Association (Union or bank) is a mutually owned, federal savings and loan association headquartered in Kewanee, Illinois, with an asset size of \$150.9 million, as of December 31, 2023. The bank owns a dormant service corporation that was used to sell other real estate

owned properties. The dormant service corporation does not negatively affect the bank's ability to meet the credit needs of its AAs.

Union is an interstate bank with operations in Illinois and Wisconsin, with each state being a rating area. The Illinois rating area contains one AA covering Henry and Rock Island counties in northwest Illinois and is part of the Davenport-Moline-Rock Island, IA-IL MSA (Illinois AA). The Wisconsin rating area contains one AA covering Dane County in south central Wisconsin and is part of the Madison, Wisconsin MSA (Wisconsin AA).

The bank has five branches and five automated teller machines (ATMs) located within the Illinois AA as of December 31, 2023. The Illinois AA branches offer lobby and drive-up services on Saturday. There is one branch with lobby access located within the Wisconsin AA. The bank provides additional banking access to customers through internet and mobile platforms. There were no branch closures or openings during the review period.

Union's lending strategy is largely focused on home mortgage lending with products for purchase, refinance, home equity, one-to-four family rentals, and multifamily loans. The bank's home mortgage lending in Illinois is primarily owner-occupied lending. In Wisconsin, Union is primarily engaged in multifamily lending.

Residential real estate loans represent the largest portfolio at \$75.1 million, followed by commercial loans at \$47.4 million, and consumer loans at \$225 thousand, per call report data as of December 31, 2023. Union originated and purchased 288 loans totaling \$59.3 million from January 1, 2021, to December 31, 2023, per bank data.

Union reported a net loans and leases to total assets ratio of 80.3 percent and a tier 1 leverage capital ratio of 15.4 percent as of December 31, 2023.

There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of its AAs.

The previous CRA rating, which the Office of the Comptroller of Currency (OCC) determined using the Small Bank evaluation procedures was Outstanding, as detailed in the CRA Performance Evaluation (PE) dated September 30, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Union under the Small Bank evaluation procedures, which includes a Lending Test. The Lending Test evaluates the bank's history of meeting the credit needs of its AAs through lending activities. The evaluation period is from the previous CRA evaluation date of September 30, 2019, through December 31, 2023. The Lending Test evaluates loans originated and purchased from January 1, 2021, through December 31, 2023.

Union's primary loan products are residential mortgage loans as reported in Home Mortgage Disclosure Act (HMDA) data. Residential mortgage lending represented 93.8 percent by dollar and 96.5 percent by number of all originations and purchases between January 1, 2021, and 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 assessment areas 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

The bank’s overall rating is a blend of the state ratings for Illinois and Wisconsin.

The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) 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 Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Illinois

CRA rating for the state of Illinois: Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The bank exhibits an excellent geographic distribution.
- The bank exhibits an excellent borrower distribution.

Description of Institution's Operations in Illinois

Union has one legal AA in the state of Illinois, the Illinois AA. The Illinois AA consisted of 53 census tracts (CTs) in 2021 and 57 CTs in 2022 and 2023, all located within Rock Island and Henry counties. There were two low-income CTs and 19 moderate-income CTs in 2021. There were four low-income CTs and 17 moderate-income CTs in 2022 and 2023.

Union's lending strategy in Illinois remains focused on owner-occupied home mortgage lending.

The bank serves its customer through five branch locations and five ATMs. All five ATMs are located at the branches. The Illinois branches offer additional lobby and drive-up services on Saturdays.

Major employment sectors in the AA include manufacturing, retail trade, and healthcare, per the Illinois Department of Commerce. Major employers include Rock Island Arsenal, Deere & Company, Tyson Fresh Meats, Trinity Medical Center, and Henry County Public School Districts.

According to the U.S. Bureau of Labor Statistics, the annual unemployment rate in the state of Illinois was 6.1 percent for 2021 and then declined to 4.6 for 2022, and 4.5 for 2023. The two counties in the Illinois AA compared favorably to the state of Illinois in 2021, had comparable rates of unemployment in 2022, and compared unfavorably in 2023.

Union sources 97.5 percent of its \$129.3 million in deposits from the Illinois AA. Union held a 2.8 percent deposit market share and ranked 14th out of 22 FDIC insured institutions competing for the areas \$4.5 billion in deposits as of June 30, 2023. The top five institutions represented 51.7 percent of the total deposit market share.

For the Illinois AA, we obtained a community contact representing an organization focused on bringing and maintaining businesses in Kewanee, Illinois, including surrounding communities in Henry County. The contact described the economic condition of the area as struggling but stable. The contact noted the greatest needs of the community are educational followed by economic development and business loans. The contact noted no unmet banking needs of the area. The contact had positive perceptions, stating Union stood out as a bank that is very supportive of the community.

Illinois AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Illinois AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	3.8	35.8	52.8	7.5	0.0
Population by Geography	197,044	2.3	29.2	60.3	8.3	0.0
Housing Units by Geography	87,903	2.3	29.2	60.4	8.0	0.0
Owner-Occupied Units by Geography	57,825	0.8	23.3	65.8	10.1	0.0
Occupied Rental Units by Geography	22,736	5.4	40.5	50.6	3.5	0.0
Vacant Units by Geography	7,342	4.7	40.5	48.9	5.9	0.0
Businesses by Geography	11,557	4.3	32.9	55.1	7.7	0.0
Farms by Geography	814	0.2	11.4	78.6	9.7	0.0
Family Distribution by Income Level	51,101	21.4	19.4	22.2	37.1	0.0
Household Distribution by Income Level	80,561	24.7	17.2	19.1	39.0	0.0
Median Family Income MSA - 19340 Illinois AA		\$66,600	Median Housing Value			\$111,940
			Median Gross Rent			\$655
			Families Below Poverty Level			10.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Illinois AA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	7.0	29.8	52.6	10.5	0.0
Population by Geography	193,956	4.7	24.7	58.1	12.5	0.0
Housing Units by Geography	88,351	5.1	24.9	58.2	11.8	0.0
Owner-Occupied Units by Geography	56,930	2.8	19.2	62.8	15.2	0.0
Occupied Rental Units by Geography	23,673	8.8	34.9	51.3	5.1	0.0
Vacant Units by Geography	7,748	10.4	36.5	45.8	7.3	0.0
Businesses by Geography	14,170	6.8	27.7	53.9	11.6	0.0
Farms by Geography	915	2.7	9.1	65.2	23.0	0.0
Family Distribution by Income Level	50,893	21.6	19.2	21.9	37.2	0.0
Household Distribution by Income Level	80,603	25.2	16.6	18.8	39.5	0.0
Median Family Income MSA - 19340 Illinois AA		\$76,902	Median Housing Value			\$121,694
			Median Gross Rent			\$743
			Families Below Poverty Level			9.9%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Illinois

The Illinois rating area contains one AA and received a full scope review. The state of Illinois rating area received a greater weight than the state of Wisconsin in determining the overall rating conclusion as the state of Illinois accounts for 97.5 percent of the bank's deposits and 69.2 percent of home mortgage loans inside the AAs during the evaluation period as of June 30, 2023, per FDIC data.

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Outstanding.

Based on a full-scope review the bank's lending performance in the state of Illinois is excellent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The geographic distribution of home mortgage loans reflects excellent distribution in the AA. Due to limited lending opportunities in low-income geographies, we gave more weight to the performance in moderate-income geographies.

For 2021, the distribution of home mortgage loans is excellent. The proportion of lending in low-income geographies was less than both the percentage of owner-occupied housing units in the AA and the aggregate distribution. The proportion of lending in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units in the AA and the aggregate distribution.

For 2022 and 2023, the distribution of home mortgage loans is excellent. The proportion of lending in low-income geographies significantly exceeded both the percentage of owner-occupied housing units in the AA and the aggregate distribution. The proportion of lending in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units in the AA and the aggregate distribution.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

The distribution of home mortgage loans reflects excellent distribution in the AA.

For 2021, the distribution of home mortgage loans is excellent. The proportion of lending to low-income families exceeded the percentage of low-income families in the AA and significantly exceeded the aggregate distribution. The proportion of lending in moderate-income families exceeded both the percentage of moderate-income families in the AA and the aggregate distribution.

For 2022 and 2023, the distribution of home mortgage loans is excellent. The proportion of lending to low-income families significantly exceeded both the percentage of low-income families in the AA and the aggregate distribution. The proportion of lending to moderate-income families exceeded both the percentage of moderate-income families in the AA and the aggregate distribution.

Lending Gap Analysis

We performed a lending gap analysis that included a review of the density maps of HMDA loans in Illinois. We did not identify any unexplained, conspicuous gaps in lending.

Responses to Complaints

Union did not receive any complaints about its performance in helping to meet the credit needs of its AA during the evaluation period.

State Rating

State of Wisconsin

CRA rating for the state of Wisconsin: Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The bank exhibits an excellent geographic distribution.
- The bank exhibits an excellent borrower distribution.

Description of Institution's Operations in Wisconsin

Union has one legal AA in the state of Wisconsin, the Wisconsin AA. The Wisconsin AA consisted of 107 CTs in 2021 and 125 CTs in 2022 and 2023, all located within Dane County. There were four low-income CTs and 17 moderate-income CTs in 2021. There were five low-income CTs and 18 moderate-income CTs in 2022 and 2023.

Union's lending strategy in Wisconsin has remained focused on multifamily home mortgage lending.

The bank has one branch in the Wisconsin AA. The bank has no ATMs in the Wisconsin AA.

Union sources 2.5 percent of its \$129.3 million in deposits from the Wisconsin AA. Union held a 0.01 percent deposit market share and ranked 33rd out of 33 FDIC insured institutions completing for \$23.5 billion in deposits as of June 30, 2023. The top five institutions represented 50.8 percent of the total deposit market share.

Major employment sectors in the AA include education and health services, professional and business services, trade, transportation, and utilities. Major employers include the University of Wisconsin-Madison, UW Health, the State of Wisconsin, Epic Systems Corp, and American Family Insurance.

According to the U.S Bureau of Labor Statistics, the annual unemployment rate in the state of Wisconsin was 3.8 percent for 2021 and then declined to 2.9 in 2022 and remained stable at 3.0 in 2023. Dane County's unemployment rates compared favorably to the state of Wisconsin in 2021, 2022, and 2023.

For the Wisconsin AA, we obtained a community contact representing an economic development corporation. The contact stated the economic condition of Dane County has recovered from the Covid-19 pandemic; however, the county has seen declines in workers in the hospitality, retail, and tourism sectors. The contact noted the greatest needs of the community include economic development for small businesses, affordable childcare, and housing support services. In addition, the contact noted the need for secondary sources of funding, including gap funding and equity funding, for affordable housing. The contact noted no unmet banking needs of the area and had no negative perceptions of Union.

Wisconsin AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wisconsin AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	107	3.7	15.9	47.7	27.1	5.6
Population by Geography	510,198	4.2	12.3	51.1	28.9	3.6
Housing Units by Geography	220,503	3.6	13.6	52.2	28.2	2.3
Owner-Occupied Units by Geography	122,677	0.8	8.8	57.5	32.9	0.0
Occupied Rental Units by Geography	88,437	7.5	20.0	45.1	22.1	5.3
Vacant Units by Geography	9,389	3.2	17.0	50.7	24.3	4.7
Businesses by Geography	39,622	2.5	13.3	49.0	33.0	2.2
Farms by Geography	1,657	0.7	5.4	56.5	37.0	0.4
Family Distribution by Income Level	122,178	19.1	16.6	22.6	41.7	0.0
Household Distribution by Income Level	211,114	23.0	16.5	18.4	42.1	0.0
Median Family Income MSA - 31540 Wisconsin AA		\$81,321	Median Housing Value			\$238,128
			Median Gross Rent			\$944
			Families Below Poverty Level			6.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wisconsin AA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	125	4.0	14.4	48.8	27.2	5.6
Population by Geography	561,504	4.0	12.8	51.0	28.0	4.1
Housing Units by Geography	236,202	3.7	14.5	52.1	26.7	2.9
Owner-Occupied Units by Geography	133,695	0.9	10.2	57.8	31.0	0.2
Occupied Rental Units by Geography	92,905	7.3	20.7	44.3	21.1	6.6
Vacant Units by Geography	9,602	8.7	15.5	47.5	22.7	5.5
Businesses by Geography	63,583	4.9	12.5	50.1	29.3	3.3
Farms by Geography	2,352	1.7	5.9	66.2	25.6	0.6
Family Distribution by Income Level	125,826	17.1	17.9	23.3	41.7	0.0
Household Distribution by Income Level	226,600	22.0	16.9	18.6	42.5	0.0
Median Family Income MSA - 31540 Wisconsin AA		\$97,334	Median Housing Value			\$274,332
			Median Gross Rent			\$1,131
			Families Below Poverty Level			5.0%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Wisconsin

The Wisconsin rating area contains one AA and received a full scope review.

LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated Outstanding.

Based on a full-scope review the bank's performance in the state of Wisconsin is excellent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The distribution of home mortgage loans reflects excellent distribution in the AA.

For 2021, the distribution of home mortgage loans is excellent. The proportion of lending in low-income geographies significantly exceeded both the percentage of owner-occupied housing units in the AA and the aggregate distribution. The proportion of lending to moderate-income geographies significantly exceeded both the percentage of owner-occupied housing units in the AA and the aggregate distribution.

For 2022 and 2023, the distribution of home mortgage loans reflected excellent distribution. The proportion of lending in low-income geographies was less than the percentage of owner-occupied housing units in the AA and was weaker than the aggregate distribution. The proportion of lending in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units in the AA and was significantly stronger than the aggregate distribution.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

Due to the focus on multifamily lending in the Wisconsin AA, income information of the borrower is unavailable for the majority of the bank's loans within the AA. For a meaningful analysis, we only considered the loans with income information available; however, as the sample of loans was reduced considerably, we gave less weight to the borrower distribution.

For 2021, the sample was reduced from 43 to 15 home mortgage loans. The distribution of home mortgage loans is excellent. The proportion of lending to low-income families was less than the percentage of low-income families in the AA and was near to the aggregate distribution. The proportion of lending to moderate-income families exceeded both the percentage of moderate-income families in the AA and the aggregate distribution.

For 2022 and 2023, the sample was reduced from 26 to 13 home mortgage loans. The distribution of home mortgages is excellent. The proportion of lending to low-income families was less than the percentage of low-income families in the AA and exceeded the aggregate distribution. The proportion of lending to moderate-income families significantly exceeded both the percentage of moderate-income families in the AA and the aggregate distribution.

Lending Gap Analysis

We performed a lending gap analysis that included a review of the density maps of HMDA loans in Wisconsin. We did not identify any unexplained, conspicuous gaps in lending.

Responses to Complaints

Union did not receive any complaints about its performance in helping meet the credits needs of its AA during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the MSAs and Non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	January 1, 2021, through December 31, 2023.	
Bank Products Reviewed:	Home mortgage	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Illinois		
Illinois AA	Full-Scope	All CTs in Henry and Rock Island counties
State of Wisconsin		
Wisconsin AA	Full-Scope	All CTs in Dane County

Appendix B: Summary of MMSA and State Ratings

RATINGS	Union Federal Savings & Loan Association
Overall Bank:	Lending Test Rating
Union FS & LA	Outstanding
State:	
State of Illinois	Outstanding
State of Wisconsin	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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 30th of each year. Tables without data are not included in this PE.

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

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

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Illinois AA	69	5,074,420	20.7	8,182	0.8	0.0	0.5	23.3	65.2	18.3	65.8	34.8	69.6	10.1	0.0	11.7	0.0	0.0	0.0
Wisconsin AA	43	19,416,223	79.3	37,699	0.8	2.3	0.8	8.8	18.6	8.2	57.5	46.5	55.5	32.9	30.2	35.4	0.0	2.3	0.1
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
UNION FEDERAL SAVINGS & LOAN (40000000244) excluded from Aggregate																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Illinois AA	86	7,572,263	36.8	3,954	2.8	14.0	2.0	19.2	62.8	20.5	62.8	19.8	64.6	15.2	3.5	12.8	0.0	0.0	0.0
Wisconsin AA	26	12,983,400	63.2	15,014	0.9	0.0	0.7	10.2	15.4	10.1	57.8	61.5	57.6	31.0	11.5	31.4	0.2	11.5	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
Union Federal Savings & Loan A (10000700244) excluded from Aggregate																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Illinois AA	69	5,074,420	20.7	8,182	21.4	24.6	13.0	19.4	27.5	22.5	22.2	15.9	20.8	37.1	24.6	25.3	0.0	7.2	18.5
Wisconsin AA	43	19,416,223	79.3	37,699	19.1	2.3	6.9	16.6	7.0	19.9	22.6	11.6	25.0	41.7	14.0	39.5	0.0	65.1	8.7
Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
UNION FEDERAL SAVINGS & LOAN (40000000244) excluded from Aggregate																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Illinois AA	86	7,572,263	36.8	3,954	21.6	25.6	15.7	19.2	26.7	24.8	21.9	17.4	21.3	37.2	27.9	20.2	0.0	2.3	18.1
Wisconsin AA	26	12,983,400	63.2	15,014	17.1	3.8	6.6	17.9	15.4	18.8	23.3	19.2	26.3	41.7	11.5	40.8	0.0	50.0	7.4
Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
Union Federal Savings & Loan A (10000700244) excluded from Aggregate																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.