First Federal Bank of Wisconsin Community Reinvestment Act (CRA) Public File

CRA PUBLIC COMMENTS

First Federal Bank of Wisconsin has not received any comments from the public regarding our CRA activities.

CRA Performance Evaluation

This section includes February 14, 2022 OCC CRA Performance Evaluation



PUBLIC DISCLOSURE

February 14, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Bank of Wisconsin Charter Number 705313

> 1617 East Racine Avenue Waukesha, WI 53186

Office of the Comptroller of the Currency

Milwaukee Field Office 1200 North Mayfair Road, Suite 200 Wauwatosa, WI 53226

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: First Federal Bank or Wisconsin's (First Federal or bank) is rated **Satisfactory.**

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and the credit needs of its assessment area (AA).
- A majority of loan originations are made within the bank's AA.
- The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of businesses loans reflects excellent distribution among geographies.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, First Federal's loan-to-deposit ratio is more than reasonable.

The bank's quarterly LTD ratio averaged 92.32 percent over the 13 quarters from December 31, 2018 to December 31, 2021. The bank ranks fourth in a peer group which includes seven other similarly situated banks with peer bank LTD ratios ranging from 78.37 percent to 127.47 percent in the specified time period. The banks in this peer group have total assets ranging from \$26.9 million to \$915.2 million.

Lending in Assessment Area

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

The bank originated or purchased 68.4 percent of its total loans by number and 63.2 percent by dollar amount inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. See the table below for additional detail.

Т	able D ·	- Lendi	ng Insid	e and (Outside (of the Asso	essmen	t Area			
	N	umber	of Loans	,		Dolla	r Amoi \$(00	unt of Loa 00s)	ins		
Loan Category	Insi	de	Outs	ide	Total	Insic	le	Outsi	de	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Home Mortgage						_					
2018	54	60.0	36	40.0	90	14,182	51.6	13,302	48.4	27,484	
2019	25	64.1	14	35.9	39	5,582	59.3	3,837	40.7	9,419	
2020	44	62.9	26	37.1	70	12,009	56.9	9,093	43.1	21,103	
Subtotal	123	61.8	76	38.2	199	31,774	54.8	26,232	45.2	58,005	
Small Business											
2018-2020	63	86.3	10	13.7	73	22,828	80.4	5,581	19.7	28.409	
Subtotal	63	86.3	10	13.7	73	22,828	80.4	5,581	19.7	28,409	
Total	186	68.4	86	31.6	272	54,602	63.2	31,813	36.8	86,414	
Source: 01/01/2018 12/31/20	20 Daul Da	4				•				•	

Source: 01/01/2018 - 12/31/2020 Bank Data Due to rounding, totals may not equal 100.0%

Description of Institution

First Federal is a single-state thrift institution headquartered in Waukesha, Wisconsin, and a majority-owned subsidiary of FFBW, MHC. As of December 31, 2021, First Federal had \$357.1 million in total assets, a loan portfolio of \$225.3 million, and tier 1 capital of \$75.6 million. On December 31, 2020, First Federal acquired Mitchell Bank, which increased total assets from \$285.6 million as of September 30, 2020, to \$338.5 million as of year-end 2020.

First Federal is a full-service bank offering a variety of traditional loan and deposit products. The bank's primary lending focus is commercial lending. As of December 31, 2021, the loan portfolio represents 63.0 percent of total assets and is comprised of 78.9 percent of commercial loans, 21.0 percent of residential real estate loans, and 0.2 percent of consumer loans.

During the evaluation period, First Federal operated out of four branches, two located in Waukesha, one in Milwaukee, and one in Brookfield. Of the three branches located in Waukesha County, two are located in middle-income census tracts (CT) and one is located in an upper-income CT. The one branch located in Milwaukee County is in a middle-income CT. While not considered as part of this evaluation, as part of the Mitchell Bank acquisition, the bank added two branches, one in Brookfield and another on the south side of Milwaukee. The Mitchell Bank branch in Brookfield was closed and combined with the existing First Federal Brookfield branch due to location proximity. The surviving Mitchell Bank branch in Milwaukee County is located in a low-income CT. All of the bank's branches have automated teller machines. These additional locations are not considered in this assessment as the merger transaction occurred at the end of the evaluation period for the Lending Test but will be included as part of the next CRA performance evaluation.

The bank also received positive consideration for its response to the COVID-19 pandemic in 2020 through the origination of loans through the SBA Paycheck Protection Program (PPP). These loans helped to stabilize small businesses and communities in the AAs and statewide areas. The bank originated 170 PPP loans totaling \$14.0 million in 2020.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs of its AA. At the prior CRA examination dated February 4, 2019, First Federal was evaluated using Small Bank Procedures and received a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated First Federal's performance using the Small Bank procedures. The Lending Test assesses the bank's record of meeting credit needs of its AA through lending activities during the evaluation period of January 1, 2018 to December 31, 2020. We reviewed data for the bank's primary loan products, including small business loans and home mortgage loans, to evaluate the bank's lending performance.

To assess lending, we used data from bank reports and a random sample of loans for each primary loan product originated or purchased in the bank's AA. Our lending analysis used the most recent available demographic and aggregate peer lending data.

The federal banking agencies are now updating decennial census data every five years, beginning with the Census Bureau's 2015 American Community Survey (ACS). This change was implemented in order to provide more current and accurate demographic data. During the current evaluation period, First Federal's AA was not affected by this change, and the lending data from 2018 through 2020 received the same analysis based on the 2015 ASC. Data is discussed in the applicable narrative sections of this evaluation

Selection of Areas for Full-Scope Review

Given the bank only has one AA, we reviewed this Metropolitan Statistical Area (MSA) using full-scope procedures.

Ratings

The bank's overall rating is based primarily on those areas that receive full-scope reviews.

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 Wisconsin

CRA rating for the State of Wisconsin: Satisfactory. The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of businesses loans reflects excellent distribution among geographies.
- There were no CRA related complaints during the evaluation.

Description of Institution's Operations in Wisconsin

The bank has one AA located entirely in the state of Wisconsin. The Milwaukee-Waukesha, WI MSA AA includes all of Waukesha County and the southern portion of Milwaukee County. The AA complies with regulatory requirements and does not arbitrarily exclude any LMI geographies.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 210 CTs, of which 23 (11.0 percent) are low-income, 37 (17.6 percent) are moderate-income, 76 (36.2 percent) are middle-income, and 74 (35.2 percent) are upper-income. There were none that were designated as NA.

The total population of the AA is 849,258, which is comprised of 215,836 families. The number of families at each income level is: 42,866 low-income (19.9 percent), 34,687 moderate-income (16.1 percent), 43,561 middle income (20.2 percent), and 94,722 upper-income (43.9 percent). The average median family income is \$71,764, and the FFIEC 2020 updated MSA median family income is \$83,800. The percentage of families below the poverty level is 8.6 percent. Owner-occupied units comprise 61.27 percent of total housing units. Based on 2020 demographic data, the total number of businesses with reported revenues in the AA was 48,697. Of these businesses, 38,592 (79.3 percent) had gross revenues of \$1.0 million or less, 4,309 (8.9 percent) had gross revenues of greater than \$1.0 million, and 5,796 (11.9 percent) businesses did not report revenue.

According to the FDIC Deposit Market Share Report as of June 30, 2021, there is significant competition within the AA. First Federal ranks 23rd in total deposits and has an overall market share of 0.33 percent. The balance of the market share is divided among 40 other financial institutions, ranging from 0.01 percent to 41.30 percent.

Employment and Economic Factors

The December 2020 annual unemployment rate for Milwaukee County and Waukesha County was 5.6 percent and 3.4 percent respectively. The annual unemployment rate for the state of Wisconsin was 4.0 percent. During the evaluation period, the unemployment rate for Milwaukee County got as high as 16.5 percent and 13.1 percent for Waukesha County in April of 2020, driven largely by the COVID-19 pandemic. Major employers in the area include Aurora Health Care Inc., Froedtert Health, Quad Graphics Inc, and Kohl's.

According to Moody's Analytics report, hotels, restaurants, and other leisure-time activities saw more than 10,000 jobs added in 2021, or more than half of those lost to the pandemic remaining to be filled. Expansions in technology manufacturing firms such as top employer GE Healthcare, and parts producer Foxconn, which has been adding hundreds of jobs each year to its plant in Racine County to obtain preferential tax treatment, are helping the area shift away from declining industries such as paper products. Increased activity in durable goods manufacturing and easing of pandemic supply constraints will be key contributors to growth in the near term, and the largest source of risks".

Community Contact

We used community contact information for Milwaukee County and reviewed an action plan for Waukesha County. Affordable housing is a need in the community with projects located near job centers. Housing will need to be affordable to service employees and other lower-wage members of the workforce. There is also a need for housing rehabilitation programs, foreclosure prevention, and access to housing for senior citizens in the area.

Table A – Der	nographic I	nformation	of the Assessn	nent Area		
Assessment A	rea: First F	ederal Milw	aukee-Wauke	esha MSA		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	210	11.0	17.6	36.2	35.2	0.0
Population by Geography	849,258	8.7	15.6	34.0	41.6	0.0
Housing Units by Geography	356,533	7.4	16.1	36.7	39.8	0.0
Owner-Occupied Units by Geography	218,436	3.1	12.2	33.5	51.1	0.0
Occupied Rental Units by Geography	118,685	13.6	23.1	43.4	19.9	0.0
Vacant Units by Geography	19,412	17.0	17.8	32.0	33.1	0.0
Businesses by Geography	48,697	4.7	13.2	31.7	50.4	0.0
Farms by Geography	1,093	3.2	8.4	27.7	60.7	0.0
Family Distribution by Income Level	215,836	19.9	16.1	20.2	43.9	0.0
Household Distribution by Income Level	337,121	21.8	14.9	17.7	45.7	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housi	ng Value		\$198,782
			Median Gross	Rent		\$855
			Families Belo	w Poverty Le	vel	8.6%

Source: 2015 ACS and 2020 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 state rating is based on the results of the Milwaukee-Waukesha MSA AA. Since this AA is the only AA, it received a full-scope review.

LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated Satisfactory. Based on a full-scope review, the bank's performance in the Milwaukee-Waukesha MSA is adequate.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The borrower distribution of loans reflects reasonable distribution among borrowers of different geographies. The bank originated 1.6 percent of home mortgage loans in low-income geographies. The percentage of the bank's loans is below the demographics that show 3.1 percent of owner-occupied housing units is in low-income geographies. The percentage of bank originated loans exceeds the aggregate peer lending data, which shows 1.0 percent of home mortgage lending was in low-income geographies. The bank originated 17.1 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's loans exceeded the demographics that show 12.2 percent of owner-occupied housing units is in moderate-income geographies. The percentage of bank originated loans also exceeds the aggregate peer lending data, which shows 8.6 percent of home mortgage lending was in low-income geographies.

Small Loans to Businesses

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

The borrower distribution of loans reflects excellent distribution among geographies. The bank originated 17.5 percent of business loans in low-income geographies. The percent of the bank's originated loans exceeds the demographics that indicate 4.7 percent of AA businesses are in low-income geographies and exceeds the aggregate peer lending data in the low-income geographies of 4.4 percent. The bank originated 14.3 percent of business loans in moderate-income geographies. The percent of the bank's originated loans exceeds the demographics that indicate 13.2 percent of AA businesses are in moderate-income geographies and exceeds the aggregate peer lending data in the moderate-income geographies of 11.8 percent.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 4.0 percent of its home mortgages to low-income families. This percentage is less than the demographics that indicate 19.9 percent of families in the AA are low-income. The percentage of bank loans to low-income families is less than the aggregate peer lending data, which show 4.7 percent of peer lending within the AA was to low-income families. The bank originated 8.9 percent of home mortgages to moderate-income families, which is less than the demographics that show 16.1 percent of families in the AA are moderate-income. The bank's lending is also less than the aggregate peer lending data, which show 17.2 percent of peer lending within the AA was to moderate-income families.

Small Loans to Businesses

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

The borrower distribution of loans reflects reasonable distribution amount businesses of different sizes. The bank originated 68.3 percent of its business loans to AA small businesses (businesses with gross annual revenues of \$1.0 million or less). This percentage of loans to small businesses is less than the percentage of small businesses in the AA, which is 79.2 percent of total businesses. The percentage of bank loans to small businesses exceeds the aggregate lending data which shows 37.0 percent of peer business lending in the AA was to small businesses.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practices during this evaluation.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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, 2018 through De	cember 31, 2020
Bank Products Reviewed:	Home mortgage and small l	ousiness loans.
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.		
List of Assessment Areas and Type of	of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
Milwaukee-Waukesha, WI MSA	Full-scope	All of Waukesha County and the southern portion
Willwaukee- waukesila, Wil WISA	Tun-scope	of Milwaukee County

Appendix B: Summary of MMSA and State Ratings

RATINGS	First Federal Bank of Wisconsin
Overall Bank:	Lending Test Rating
First Federal Bank of Wisconsin	Satisfactory
State:	
Wisconsin	Satisfactory

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.

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.
- **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.
- 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 S.** Assessment Area Distribution of Loans to Farms by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless

of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer 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 households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the	2018-2020
Geography	

	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$		Overall Market	(lecumped		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		
First Federal Milwaukee- Waukesha MSA	123	31,774	100.0	57,951	3.1	1.6	1.0	12.2	17.1	8.6	33.5	39.8	29.0	51.1	41.5	61.4	0.0	0.0	0.0
Total	123	31,774	100.0	57,951	3.1	1.6	1.0	12.2	17.1	8.6	33.5	39.8	29.0	51.1	41.5	61.4	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the	2018-2020
Borrower	

	Total Home Mortgage Loans			e 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
First Federal Milwaukee- Waukesha MSA	123	31,774	100.0	57,951	19.9	4.0	4.7	16.1	8.9	17.2	20.2	11.4	22.5	43.9	39.8	43.7	0.0	39.0	11.9
Total	123	31,774	100.0	57,951	19.9	4.0	4.7	16.1	8.9	17.2	20.2	11.4	22.5	43.9	39.8	43.7	0.0	39.0	11.9

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA 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	2018-2020
the Geography	

	Total Loans to Small Businesses					Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
First Federal Milwaukee MSA		22,828	100.0	18,728	4.7	17.5	4.4	13.2	14.3	11.8	31.7	31.8	30.0	50.4	36.5	53.8	0.0	0.0	0.0	
Total	63	22,828	100.0	18,728	4.7	17.5	4.4	13.2	14.3	11.8	31.7	31.8	30.0	50.4	36.5	53.8	0.0	0.0	0.0	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2018-2020

	Т	otal Loans to	Small Business	ses	Businesses	with Revenues	s <= 1MM	Businesses with 1M		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
First Federal Milwaukee MSA	63	22,828	100.0	18,728	79.2	68.3	37.0	8.8	31.8	11.9	0.0	
Total	63	22,828	100.0	18,728	79.2	68.3	37.0	8.8	31.8	11.9	0.0	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data,"--" data not available.

Due to rounding, totals may not equal 100.0%

List of Branches



Branches Location and Hours including census tract information

Waukesha East Office 1617 E. Racine Avenu Waukesha, WI 53186	_	<u>MSA</u> 33340	State Code 55	<u>County</u> <u>Code</u> 133	Census Tract 2024.00
Hours of Operation: Monday-Friday*	9:00am - 5:00pm	Lobby & Drive Up	Saturday* 24/7 ATM	9:00am - 12:00pm	Lobby & Drive Up
Waukesha West Office 1801 Summit Avenue Waukesha, WI 53188		33340	55	133	2031.02
Hours of Operation: Monday-Friday*	9:00am - 5:00pm	Lobby & Drive-Up	Saturday 24/7 ATM	Closed	
Bay View Office 3974 S. Howell Avenu Milwaukee, WI 53207		33340	55	79	0209.00
Hours of Operation: Monday-Friday*	9:00am - 5:00pm	Lobby & Drive-Up	Saturday 24/7 ATM	Closed	
Brookfield Office 1360 S. Moorland Roa Brookfield, WI 53005	ād	33340	55	133	2011.02
Hours of Operation: Monday-Friday*	9:00am - 5:00pm	Lobby & Drive-Up	Saturday 24/7 ATM	Closed	
Mitchell Street Office 1039 Historic W Mitch Milwaukee, WI 53204	nell Street	33340	55	79	0167.00
Hours of Operation: Lobby Monday-Friday*	9:00am - 5:00pm	Lobby	Saturday 24/7 ATM I	Closed .ocated on the side of th	ne building on 11th St.
Mitchell Street Drive 1720 S 11th St Milwaukee, WI 53204		33340	55	79	0167.00
Hours of Operation: Lobby Monday-Friday*	9:00am - 5:00pm	Lobby & Drive-Up	Saturday*	9:00am - 12:00pm	Lobby & Drive-Up
Milwaukee Office 11801 W. Silver Spring Milwaukee, WI 53225		33340	55	79	0004.00
Hours of Operation: Monday-Friday* By Appointment Only	10:00am - 3:00pm - Lobby during norn		Saturday -F 10am-3pm	Closed	

Branch Openings and Closings during the current year and the prior two calendar years



Branch Openings and Closings during the current year and the prior two calendar years

June 2022, FFBWI opened a new branch in Milwaukee at 11801 W. Silver Spring Dr, Milwaukee WI. Census Tract: 55079000400

April 10, 2021, First Federal Bank of Wisconsin ("FFBWI") closed the New Berlin Branch located at 12400 W. National Ave, New Berlin, WI.

Census Tract: 55133201402





Products and Services

Deposit Services

- Checking Accounts Money Market Accounts
- Certificates of Deposit
- Savings Accounts
- **Custodial Accounts**
- Health Savings Accounts (HSAs)
- **IRAs**
- **IOLTAs**
- **Debit Cards**
- E-statements
- Online Banking (Retail & Business)
- Online Bill Pay
- Mobile Banking Mobile Deposit Capture
- Mobile Wallet

 - o Apple Pay
 o Samsung Pay
 o Google Pay
 o Fitbit Pay

 - Garmin Pay 0
- Zelle
- Wire Transfers
- **Direct Deposit**
- Night Deposit
- Credit Cards
- Automatic Payments/Transfers
- Cash Advance Services
- **Overdraft Protection**
- Official Checks
- Safe Deposit Box at Mitchell Street only
- Notary Services
- Coin Counting
- ITIN services

Loan and Commercial Services

- **Commercial Construction Loans**
- Working Capital Lines of Credit Commercial Real Estate Loans Equipment Loans

- Consumer Loans Unsecured Term Notes
- Consumer Overdraft Line of Credit
- Business Deposit Accounts (Checking, Savings, Money Market) Municipal Deposit Accounts (Checking, Money Market)
- Business Loans, Lines of Credit, SBA Loans
- Corporate Credit Cards
- Sweep Accounts
- Remote Item Capture
- Zero Balance Accounts
- **ACH Transactions**
- **Lockbox Services**
- Bill Pay
- Positive Pay
- Merchant Services



CONSUMER FEE SCHEDULE EFFECTIVE 9/1/2023

Account Early Closure Fee (within 90 days)	\$50.00
Account Research (per hour, \$30 minimum)	\$50.00
Bill Pay Inactivity Fee (after 3 months of inactivity)	\$5.00
Bill Pay Next Day Draft Check Fee	\$14.95
Bill Pay Same Day Electronic Fee (qualified vendors only)	\$9.95
Check Cashing (non-customer)	\$10.00
Check Copy (on paper)	\$2.00
Checks – temporary (per sheet of 4)	\$4.00
Check Images returned with statement (monthly)	\$5.00
Collection Items (plus expenses)	\$29.00
Coin counting (\$100 and more)	2% of total
Copies (per page)	\$1.00
Credit card payment processing	\$3.00
Debit Card Replacement	\$10.00
Expedited Card Service	\$40.00
Excessive Transaction Fee (per item over 6 preauthorized transactions)	\$15.00
Foreign Check Deposit	\$15.00*
Foreign Currency Fee (buy or sell)	\$35.00
Green Surcharge (monthly fee per account using paper statements)	\$5.00
nactivity Fee Checking/Savings Account (monthly, after 6 months with no activity)**	\$5.00
nternational ACH	\$10.00
nternational ACH Returned	\$15.00
RA/HSA External Transfer	\$35.00
TIN Application Processing	\$75.00***
_evies/Garnishments	\$100.00
Non-Sufficient Funds (per item)	\$25.00
Official Checks	\$8.00
Overdraft Protection (per transfer)	\$10.00
Overdrafts (per item; max. 3 per day)	\$35.00
Overdrafts Consecutive Day	\$5.00
Returned Deposit Item	\$10.00
Returned Loan Payment	\$20.00
Safe Deposit Box 5x3	\$35.00
5x5	\$40.00
3x10	\$55.00
5x10	\$75.00
Late charge (per month)	\$7.50
Drilling Fee	\$225.00
Key Replacement	At cost
Statement Copy (on paper)	\$5.00
Stop Payment	\$35.00
Telephone Transfer	\$5.00
Wire Transfer Domestic (incoming)	\$15.00
Wire Transfer Domestic (outgoing)	\$35.00
Wire Transfer Domestic (outgoing) Wire Transfer International (incoming)	\$20.00
Wire Transfer International (incoming) Wire Transfer International (outgoing, in US Dollars)	\$50.00
Wire Transfer International (outgoing, in OS Donars) Wire Transfer International (outgoing, in foreign currency)	\$65.00
Wire Transfer Trace/Service Request (domestic)	\$35.00
Wire Transfer Trace/Service Request (domestic) Wire Transfer Trace/Service Request (international)	\$50.00
•	\$35.00*
Wire Transfer Returned (domestic)	\$50.00*
Wire Transfer Returned (international)	

^{*} Additional processing fees charged by other banks may apply
** Inactivity fees apply after 6 months of no customer-initiated activity for checking, money market and savings accounts with a balance under \$1,000 and after 13 months of no customerinitiated activity for HSA and HSA Money Market accounts with a balance under \$100

^{***} checking and savings account required



COMM	1EDC		EDO	SIT FEES
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	Commercial Checking	Community Checking	Business Checking
Domestic Outgoing Wires	\$35.00	\$35.00	\$35.00
Domestic Outgoing Wires (with Wire Manager)	\$15.00	\$15.00	\$15.00
Domestic Incoming Wires	\$15.00	\$15.00	\$15.00
International Wire Transfers (outgoing, in USD, Wire Manager)	\$35.00	\$35.00	\$35.00
International Wire Transfers (outgoing, in USD)	\$50.00	\$50.00	\$50.00
International Wire Transfers (outgoing, in foreign currency)	\$65.00	\$65.00	\$65.00
International Incoming Wires	\$20.00	\$20.00	\$20.00
Maintenance Charge	\$15.00	\$10.00*	No Charge
		* Waived for nonprofits with IRS Tax Exempt status	
Each Transaction Item & Each Deposited Item	\$0.15	\$0.15 (after 500)	\$0.15 (after 250)

TREASURY MANAGEMENT PRODUCTS

ACH Filter	Special Pricing
ACH Manager	Special Pricing
ACH Manager with Same Day ACH	Special Pricing
ACH Returned Item	\$15.00 (first) / \$20.00 (second) / \$25.00 (third and subsequent)
ACH Notice of Change (NOC) Item	\$15.00
Business Online Banking (per token user)	\$5.00
Cash Services	Special Pricing
Collateralized Deposits	.10 on rate
Commercial Night Drop	No Charge
Corporate HSA Processing (per corporate contribution)	\$50.00
EFT Reassociation Statement (monthly)	\$5.00
Positive Pay	Special Pricing
Positive Pay with ACH Filter	Special Pricing
Remote Deposit Capture	Special Pricing
Sweeps	Special Pricing
Wire Manager	Special Pricing
Zero Balance Account (ZBA) Sweeps	Special Pricing

COMMERCIAL LOAN CLOSING FEES

Loan Payoff Fee (administrative, not prepayment fee)	\$150.00
Loan Documentation Fee (minimum)	\$500.00
Origination Fee	Varies



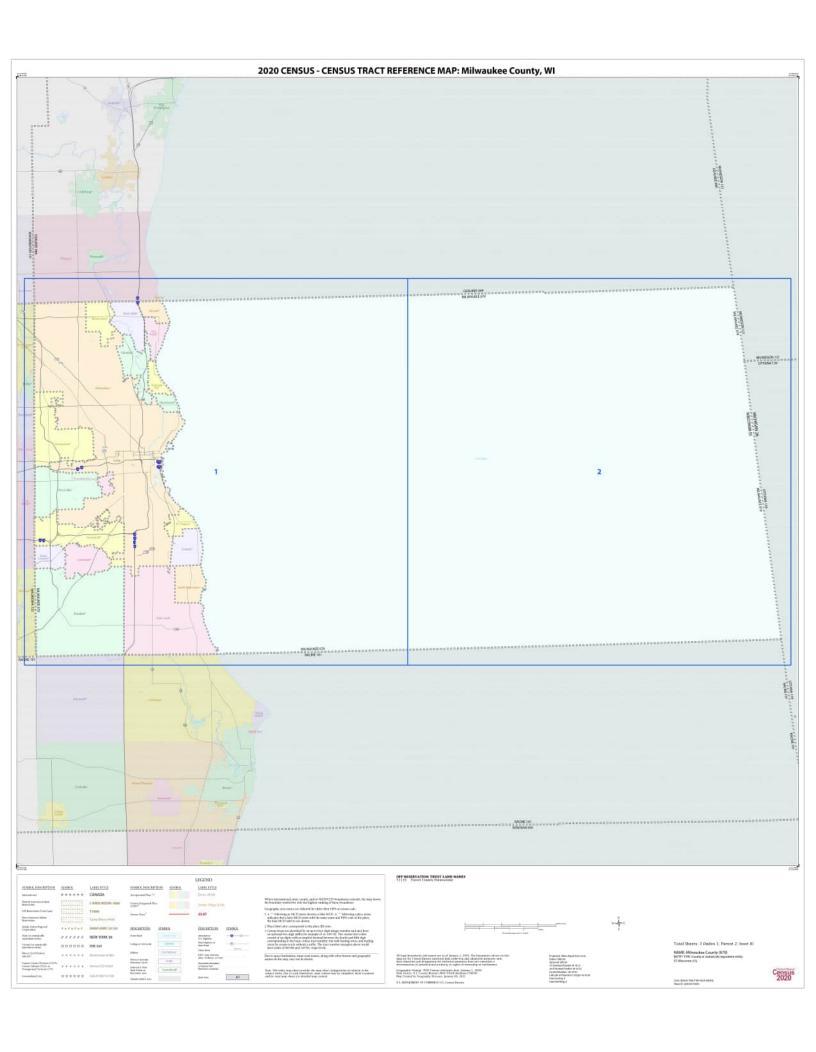
RESIDENTIAL LOAN FEES

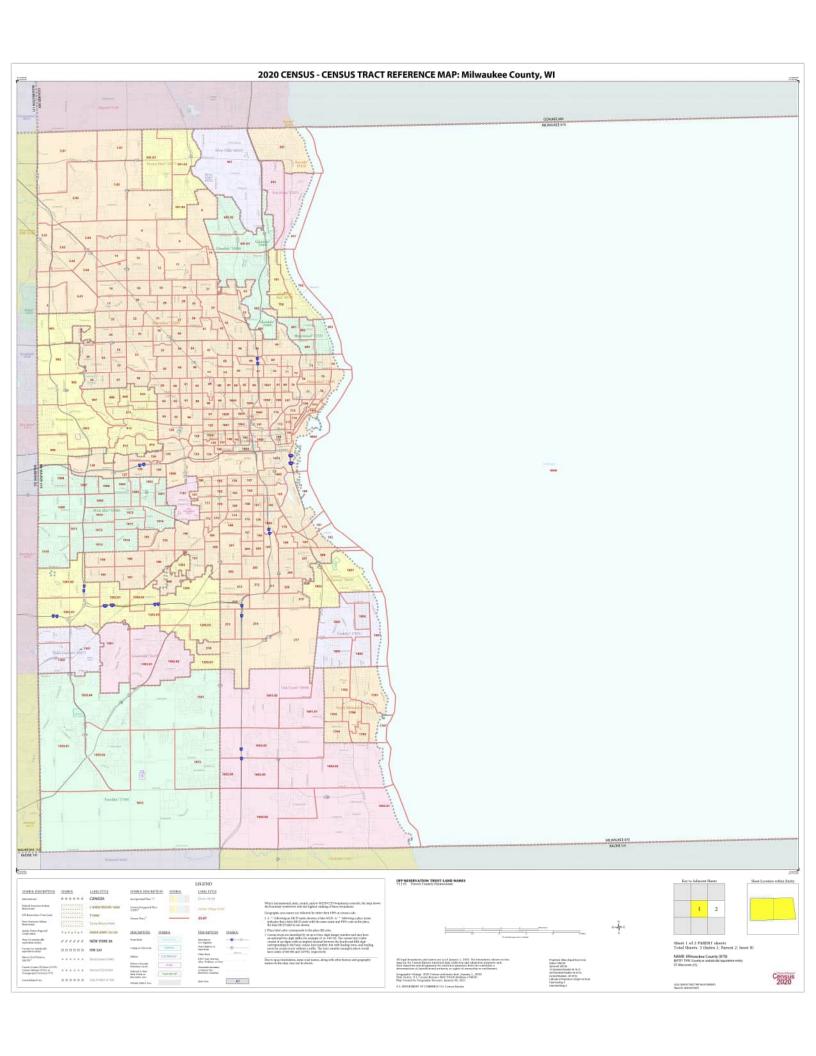
Document Review-Portfolio Home Equity Closed End 2nd mortgage over \$100,000	\$545.00
Document Review-Portfolio Home Equity Closed End 2nd mortgage under \$100,000	\$299.00
Document Review-Portfolio Loan	\$695.00
External Payoff Request	\$35.00
Modification-Matured Portfolio Loan	\$300.00
Portfolio Loan Subordination Fee	\$125.00
Underwriting-Secondary Market	\$150.00
Wire Transfer-Port Home Equity Closed End Second Mortgage (HE Loan) over \$100,000	\$45.00
Wire Transfer-Portfolio Loan	\$45.00
Wire Transfer-Secondary Market	\$45.00

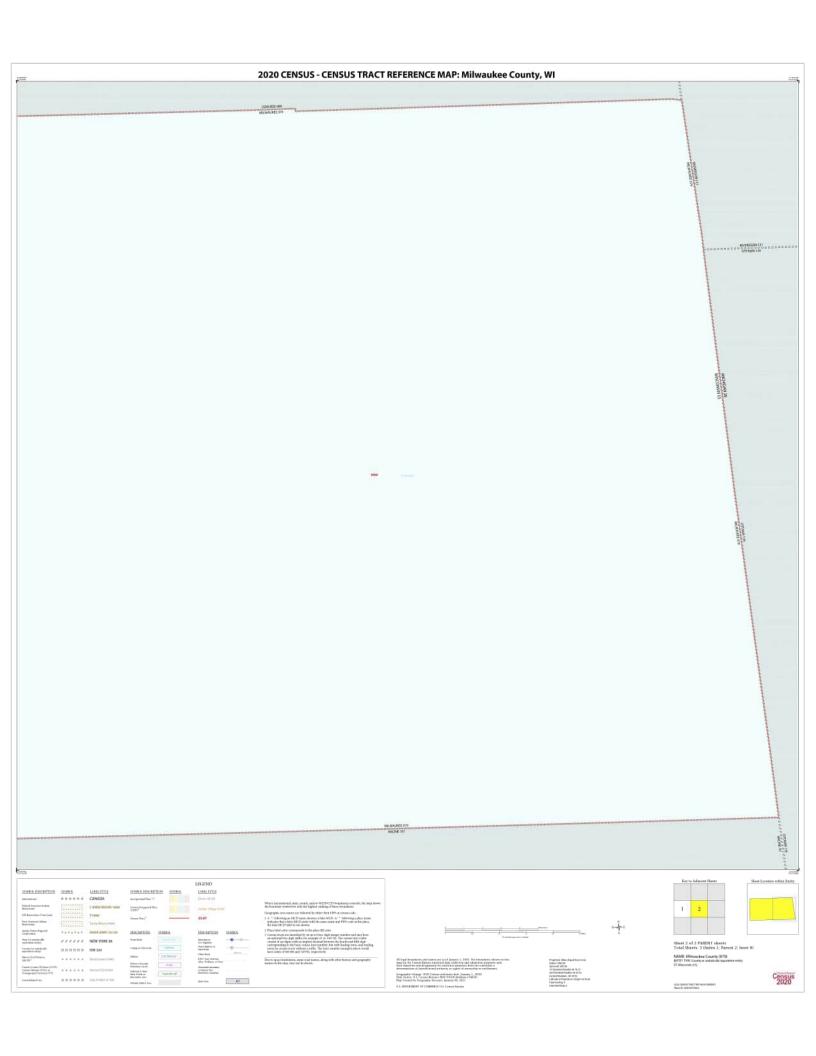
CONSUMER LOAN FEES

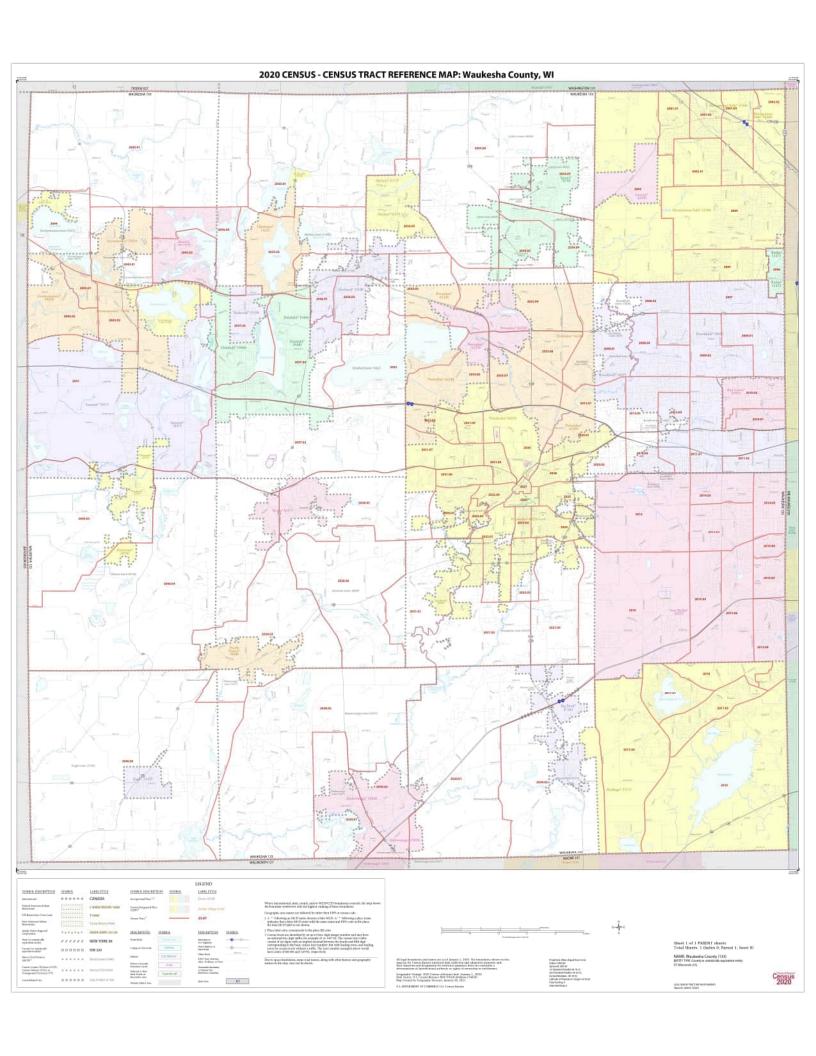
Advance Fee-Overdraft Line of Credit	\$10.00
Annual Fee-Unsecured Line of Credit	\$30.00
Annual Fee-Home Equity Line of Credit	\$50.00
External Payoff Request	\$35.00

Assessment Area All of Milwaukee County and Waukesha County









Milwaukee County 55079004300;55;079;43.00 55079009400;55;079;94.00 55079000101;55;079;1.01 55079004400;55;079;44.00 55079009500;55;079;95.00 55079000102;55;079;1.02 55079004500;55;079;45.00 55079009600;55;079;96.00 55079000201;55;079;2.01 55079004600;55;079;46.00 55079009700;55;079;97.00 55079000202;55;079;2.02 55079004700;55;079;47.00 55079009800;55;079;98.00 55079000301;55;079;3.01 55079004800;55;079;48.00 55079009900;55;079;99.00 55079000302;55;079;3.02 55079004900;55;079;49.00 55079010600;55;079;106.00 55079000303;55;079;3.03 55079005000:55:079:50.00 55079010700;55;079;107.00 55079000304;55;079;3.04 55079005100;55;079;51.00 55079010800;55;079;108.00 55079000400;55;079;4.00 55079005200;55;079;52.00 55079011000;55;079;110.00 55079000501;55;079;5.01 55079005300;55;079;53.00 55079011100;55;079;111.00 55079000502;55;079;5.02 55079005400;55;079;54.00 55079011200;55;079;112.00 55079000600:55:079:6.00 55079005500;55;079;55.00 55079011300;55;079;113.00 55079000700;55;079;7.00 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Loan to Deposit Ratio Information



2023 Quarterly Loan to Deposit Ratios

March 31, 2023 107.83

June 30, 2023 102.78

September 30, 2023 105.21

December 31, 2023 101.35