

PUBLIC DISCLOSURE

May 9, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Woori America Bank
Certificate Number: 24920

330 Fifth Avenue
New York, New York 10001

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
New York Regional Office

350 Fifth Avenue, Suite 1200
New York, New York 10118

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, nor should it 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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INSTITUTION RATING

INSTITUTION’S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			
*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

The Lending Test is rated Low Satisfactory.

- Lending levels reflect adequate responsiveness to assessment area credit needs.
- The bank made a high percentage of loans in its assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, adequate penetration among retail customers of different income levels and business customers of different sizes.
- The bank uses innovative or flexible lending practices in order to serve assessment area credit needs.
- The bank made an adequate level of community development loans.

The Investment Test is rated High Satisfactory.

- The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The bank exhibits good responsiveness to credit and community economic development needs.
- The bank occasionally uses innovative or complex investments to support community development initiatives.

The Service Test is rated High Satisfactory.

- Delivery systems are accessible to essentially all portions of the bank's assessment areas.
- To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.
- Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.
- The bank provides an adequate level of community development services.

DESCRIPTION OF INSTITUTION

Background and Operations

Woori America Bank (Woori) is a full-service commercial bank headquartered in New York, New York. The bank is a wholly-owned subsidiary of Woori Bank, a large commercial bank headquartered in Seoul, South Korea. Woori Bank is a subsidiary of Woori Financial Group, a financial services holding company with multiple other subsidiaries. Woori Financial Group is also headquartered in Seoul.

Woori operates 21 full-service offices throughout eight states, including six in California, five in New York, four in New Jersey, two in Virginia, and one each in Georgia, Maryland, Pennsylvania, and Texas. Additionally, the bank operates four loan production offices, with one office each in California, Illinois, Texas, and Washington. Woori opened four branches since the prior evaluation, including one new and one relocated office in California and one new office each in Georgia and Texas. The bank also closed two branch offices in California, including one branch closed as part of an office relocation. The bank was not involved in any merger or acquisition activity during the review period.

Woori offers traditional loan products, deposit products, and other banking services for both commercial and retail customers. Woori is primarily a commercial lender and originates commercial real estate loans, commercial/industrial loans, lines of credit, and business credit cards. Consumer loan products primarily include home mortgage loans and consumer credit cards. The bank offers standard deposit products including checking, savings, certificates of deposit, and individual retirement accounts.

Woori received a Satisfactory rating at its previous FDIC CRA Performance Evaluation dated January 16, 2020, based on Interagency Large Institution Examination Procedures.

Ability and Capacity

Woori's assets totaled \$3.2 billion as of March 31, 2023. This figure includes total loans of \$2.4 billion and total securities of \$201.4 million. The bank's total asset size has increased by approximately \$1.1 billion, or 54.3 percent, since the previous evaluation. The loan portfolio has increased by \$664.8 million, or 39.2 percent, over the same timeframe. Woori's current deposit base is \$2.7 billion.

Commercial real estate lending makes up the largest percentage of the bank's loan portfolio at \$1.5 billion or roughly 62.0 percent. Home mortgage lending, excluding multifamily residential lending, makes up the second largest lending category at \$441.6 million or roughly 19.0 percent. The bank does not sell home mortgage loans on the secondary market. The bank's loan portfolio composition has remained largely stable since the previous evaluation, with all major lending categories remaining consistent as percentages of the total portfolio.

The following table provides a breakdown of the bank's loan portfolio by loan category as of March 31, 2023.

Loan Portfolio Distribution as of 3/31/2023		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	31,910	1.4
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	441,636	18.7
Secured by Multifamily (5 or more) Residential Properties	173,468	7.3
Secured by Nonfarm Nonresidential Properties	1,467,210	62.1
Total Real Estate Loans	2,114,224	89.5
Commercial and Industrial Loans	241,689	10.2
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	1,774	0.1
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	4,415	0.2
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	(0)	(0.0)
Total Loans	2,362,102	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that would limit the institution's ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance is evaluated. Woori delineated the following seven assessment areas:

- New York–New Jersey: This assessment area is within the New York–Newark–Jersey City, NY-NJ-PA Metropolitan Statistical Area (MSA). The bank expanded the New York–New Jersey assessment area since the previous evaluation.
- California: This assessment area is within the Los Angeles–Long Beach–Anaheim, CA MSA.
- Virginia: This assessment area is within the Washington–Arlington –Alexandria, DC-VA-MD-WV MSA. The bank expanded the Virginia assessment area since the previous evaluation.
- Pennsylvania: This assessment area is within the Philadelphia–Camden–Wilmington, PA-NJ-DE-MD MSA.
- Maryland: This assessment area is within the Washington–Baltimore–Arlington, DC-MD-VA-WV-PA Combined Statistical Area (CSA). The bank expanded the Maryland assessment area since the previous evaluation.

- Texas: This assessment area is within the Dallas–Fort Worth–Arlington, TX MSA. The bank established the Texas assessment areas since the previous evaluation.
- Georgia: This assessment area is within the Atlanta–Sandy Springs–Alpharetta, GA MSA. The bank established the Georgia assessment area since the previous evaluation.

Given that each assessment area is located in a different state or multistate MSA, examiners assigned separate ratings for each area. Examiners evaluated the bank’s performance in New York and New Jersey as one single assessment area since the bank maintains branches in the portions of those two states that are within the New York–Jersey City, NY-NJ-PA multistate MSA. The remaining six assessment areas are located entirely within a single state.

The following table provides additional information on each assessment area, including specific counties, number of census tracts, and number of Woori branches. The table lists the assessment areas in the order of weight that each area carried in arriving at overall performance conclusions. Refer to the separate assessment area sections of this evaluation for more information on each assessment area.

Description of Assessment Areas			
Assessment Area	Counties and Independent Cities in Assessment Area	# of Census Tracts	# of Branches
New York–New Jersey	Bergen County, New Jersey, and Bronx, Kings, Nassau, New York, and Queens Counties in New York	2,690	9
California	Los Angeles, Orange	3,112	6
Virginia	Alexandria city, Arlington, Fairfax, Fairfax city, Falls Church city, Loudoun, Manassas city, Manassas Park city, Prince William	579	2
Pennsylvania	Montgomery, Philadelphia	627	1
Maryland	Anne Arundel, Baltimore, Baltimore city, Howard, Montgomery, Prince George’s	1,053	1
Texas	Collin, Dallas, Denton, Tarrant	1,507	1
Georgia	Fulton, Gwinnett	547	1
<i>Source: 2020 U.S. Census, Bank Data</i>			

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated January 16, 2020, to the current evaluation dated May 9, 2023. Examiners used the Interagency Large Institution Examination Procedures to evaluate Woori’s CRA performance. These procedures include three tests: the Lending Test, Investment Test, and Service Test. The appendices include a summary of the specific criteria evaluated under each of these tests.

In arriving at overall performance conclusions, examiners weighed each assessment area based on the proportion of bank operations and lending activity in each area. Examiners conducted full-scope reviews and provided separate ratings for each area. The following table lists the assessment areas in order of weight from greatest to least. In determining this weighting, examiners primarily considered the proportions of total lending, deposits, and branch offices in each assessment area. Examiners also considered the length of time the bank has maintained operations in each assessment area; for example, the Texas and Georgia assessment areas are new since the previous evaluation, and therefore they carried the least amount of weight. The following table details the distribution of loans, deposits, and bank offices among the seven assessment areas according to 2022 data.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans*		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
New York–New Jersey	63,668	46.8	1,637,768	62.9	9	42.8
California	22,259	16.3	467,389	17.9	6	28.5
Virginia	13,563	10.0	241,282	9.3	2	9.5
Pennsylvania	9,727	7.1	140,895	5.4	1	4.8
Maryland	7,606	5.6	63,595	2.4	1	4.8
Texas	12,657	9.3	35,433	1.4	1	4.8
Georgia	6,709	4.9	19,130	0.7	1	4.8
Total	136,189	100.0	2,605,492	100.0	21	100.0

*Source: Bank Records, FDIC Summary of Deposits (6/30/2022). *Loans include 2022 1-4 family home mortgage, small business, and multifamily loan originations and purchases.*

Activities Reviewed

For the Lending Test, examiners reviewed Woori’s home mortgage and small business lending to assess the bank’s performance, as these loan types represented major product lines for the bank. Examiners reviewed data for the three full calendar years since the prior evaluation, including 2020, 2021, and 2022. However, given that the bank’s 2020 lending performance was substantially similar and did not materially affect overall conclusions, this evaluation presents loan data only for 2021, the most recent year for which Home Mortgage Disclosure Act (HMDA) and CRA aggregate data is available, and 2022, the most recent full calendar year. Since the bank did not open a full-service branch office in the Georgia assessment area until 2022, this evaluation presents only 2022 loan data for that assessment area. Examiners did not review small farm loans since farm lending is not a major product line of the bank.

Home mortgage loans include all 1-4 family and multifamily loan originations and purchases reported under HMDA data collection requirements. During the review period, the bank made 638 1-4 family loans totaling \$327.2 million and 43 multifamily loans totaling \$61 million. Woori purchased 66 1-4 family HMDA loans totaling \$15.4 million in 2022; these loans are included with all other HMDA loan originations presented in this evaluation. Examiners evaluated Woori’s home lending performance through comparisons to 2020-2021 HMDA aggregate data and U.S. Census demographic data. Examiners used different demographic data depending on the particular year under review. For the 2020 and 2021 analysis, examiners used 2015 American Community Survey

(ACS) demographic data. For the 2022 analysis, examiners used the more recent 2020 U.S. Census demographic data.

Examiners conducted separate analyses for 1-4 family and multifamily loans. Given that the bank's multifamily lending is concentrated in the New York–New Jersey and California assessment areas, examiners analyzed multifamily loans under the Geographic Distribution criteria only in those two assessment areas. Multifamily lending volumes in the remaining assessment areas were too low to support meaningful conclusions. Additionally, since HMDA data does not include borrower income information for multifamily loans, this evaluation does not include a Borrower Profile analysis for multifamily lending.

Small business loans include all small business loans reported under the CRA data collection requirements. During the review period, the bank made 4,197 small business loans totaling \$234.4 million. Examiners evaluated Woori's small business lending performance through comparisons to 2020-2021 CRA aggregate data and 2020-2022 D&B business demographic data.

One-to-four family home mortgage lending carried the greatest weight when arriving at overall conclusions, followed by small business lending and then multifamily lending. This weighting considered the bank's business focus and the number and dollar volume of annual originations for each product. Additionally, this evaluation presents both the number and dollar volume of loan originations. However, examiners generally focused on performance by number of loans, as this is a better indicator of the number of individuals and businesses served.

Examiners reviewed the bank's delivery systems for providing retail banking services, including physical branch locations and alternative delivery systems. Examiners evaluated the impact of branch openings and closings on the accessibility of bank delivery systems within each assessment area. Refer to the Service Test portions of this evaluation for more information on these areas. Additionally, examiners evaluated the bank's retail banking products and services tailored to the needs of low- and moderate-income individuals. Refer to the Service Test portions of this evaluation, as well as the Innovative or Flexible Lending Practices sections of the Lending Test, for more information on these products and services.

Finally, examiners considered all community development loans, qualified investments, and community development services since Woori's prior CRA evaluation dated January 16, 2020. Any prior-period qualified investments received credit for the outstanding balance as of this evaluation date.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Lending Test rating is Low Satisfactory. Although Woori demonstrated good performance under the Assessment Area Concentration and Innovative or Flexible Lending Practices criteria, the bank's adequate performance under the remaining Lending Test components supports the overall rating. The conclusions regarding the bank's overall Lending Test performance were consistent with the

conclusions for all rated areas except for the California assessment area, where the bank's performance was stronger than the performance at the institution level.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. Examiners considered the significant level of lending competition throughout the assessment areas, as well as challenges related to the COVID-19 pandemic, when assessing the bank's performance under this criterion. Woori's operations are concentrated in large metropolitan areas that faced significant impacts of the pandemic and related restrictions, particularly in New York City.

As noted previously, the bank's assets increased by 54.3 percent since the previous evaluation. Total loan growth was somewhat lower, at 39.2 percent, or \$664.8 million, since the previous evaluation.

Total 1-4 family home mortgage lending declined slightly in 2020 and 2021 during the height of the COVID-19 pandemic, but lending rebounded in 2022. For comparison, the bank originated 333 total 1-4 family loans in the two years presented in the previous evaluation (2017 and 2018). In contrast, the bank originated 450 total 1-4 loans in the two years presented in this evaluation (2021 and 2022). Total 1-4 family lending was notably higher in 2022 (260 loans) compared to 2021 (190 loans). Additionally, the bank originated \$61 million in multifamily home mortgage loans from 2020 to 2022, which further supports adequate performance under this criterion.

The bank's small business lending was bolstered by the large volume of loans it made through the Small Business Administration's (SBA) Paycheck Protection Program (PPP) during the COVID-19 pandemic, which positively affected the bank's performance under this criterion. In 2020 and 2021, the bank originated 4,006 PPP loans totaling approximately \$143.8 million. Although PPP lending volumes were high, non-PPP small business lending declined slightly since the previous evaluation. For instance, the bank originated 83 total small business loans in 2018, the most recent year presented in the previous evaluation. Comparatively, in 2022, following the expiration of PPP, the bank originated 71 total small business loans.

Assessment Area Concentration

Woori originated a high percentage of its loans inside the assessment areas. The assessment area concentration of 1-4 family loans was particularly strong, with roughly 80.0 percent or more of loans, both by number and dollar volume, inside the assessment areas for all years reviewed. The percentages of small business and multifamily loans inside the assessment areas declined in 2022, but majorities of loans for both products remained inside the assessment areas in that year. Overall, with 76.3 percent of loans by number inside the assessment areas throughout the entire evaluation period, the bank demonstrated good performance under this criterion.

Lending Inside and Outside of the Assessment Areas											
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
1-4 Family Home Mortgage											
2020	148	78.7	40	21.3	188	72,867	81.8	16,237	18.2	89,104	
2021	156	82.1	34	17.9	190	98,722	89.5	11,565	10.5	110,287	
2022	219	84.2	41	15.8	260	105,310	82.4	22,499	17.6	127,809	
Subtotal	523	82.0	115	18.0	638	276,899	84.6	50,301	15.4	327,200	
Small Business											
2020	804	86.1	130	13.9	934	52,391	81.6	11,830	18.4	64,221	
2021	2,321	72.7	871	27.3	3,192	94,892	69.7	41,282	30.3	136,174	
2022	40	56.3	31	43.7	71	18,299	53.8	15,733	46.2	34,032	
Subtotal	3,165	75.4	1,032	24.6	4,197	165,582	70.6	68,845	29.4	234,427	
Multifamily Home Mortgage											
2020	12	85.7	2	14.3	14	12,365	67.6	5,915	32.4	18,280	
2021	14	70.0	6	30.0	20	20,024	70.6	8,350	29.4	28,374	
2022	6	66.7	3	33.3	9	12,580	87.8	1,740	12.2	14,320	
Subtotal	32	74.4	11	25.6	43	44,969	73.8	16,005	26.2	60,974	
Total	3,720	76.3	1,158	23.7	4,878	487,450	78.3	135,151	21.7	622,601	
<i>Source: Bank Data</i>											
<i>Due to rounding, totals may not equal 100.0%</i>											

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment areas. This conclusion is consistent with the conclusions for the New York–New Jersey assessment area, which carried the most weight in the overall ratings, and in the Virginia, Texas, and Georgia assessment areas. The bank’s performance was relatively stronger in the California and Maryland assessment areas, though it was poor in the Pennsylvania assessment area. Refer to the separate assessment area sections of this evaluation for more detailed information.

Borrower Profile

The distribution of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different sizes. This conclusion is consistent with the conclusions for the two most heavily weighted assessment areas, New York–New Jersey and California, and for the Texas assessment areas. The bank’s performance was generally better in the other four assessment areas, with particularly strong performance in the Pennsylvania and Virginia assessment areas. Refer to the separate assessment area sections of this evaluation for more detailed information.

Innovative or Flexible Lending Practices

Woori uses innovative or flexible lending practices in order to serve assessment area credit needs. Since the bank offered these loan programs throughout all assessment areas with the same terms and conditions, examiners evaluated this criterion only at the institution level.

Woori originated 3,565 innovative or flexible loans totaling \$209.8 million in the assessment areas during the evaluation period, which is more than double the roughly \$90 million in innovative or flexible loans originated during the prior evaluation period. This substantial increase is primarily the result of the bank's participation in the SBA's PPP. The following are details concerning the bank's innovative or flexible lending practices.

- **SBA Paycheck Protection Program (PPP)** - The federal government established the PPP to provide emergency assistance to businesses during the COVID-19 pandemic. The SBA provided loan forgiveness to PPP borrowers that used loan funds for eligible expenses and met employee retention criteria. Woori made 4,006 PPP loans, including 3,030 loans inside its assessment areas totaling \$103.8 million. The bank made PPP loans in each of its assessment areas, with the highest concentrations in the New York – New Jersey, Pennsylvania, and California assessment areas.
- **SBA Loans** –The bank also originated non-PPP SBA loans for commercial borrowers. SBA lending programs, namely the 504 and 7(a) programs, provide access to financing for small businesses meeting certain size and eligibility requirements. The bank receives a guaranty from the SBA for portions of such loans.
- **Affordable Housing Program** – Through its Affordable Housing Program, Woori offers flexible home mortgage loans to low- and moderate-income borrowers and to borrowers who reside in low- and moderate-income census tracts. For borrowers who obtain loans through this program, the bank offers reduced loan fees, flexible underwriting standards, and no requirement for private mortgage insurance. As such, this program is particularly beneficial for low- and moderate-income borrowers that might not otherwise qualify for traditional home mortgage loans.
- **Secured Credit Cards** – Woori offers secured credit cards, which require cardholders to pledge a Woori deposit account as collateral. This product is particularly beneficial to low- and moderate-income customers who might not otherwise qualify for a traditional unsecured credit card. Obtaining a secured credit card allows individuals to establish or repair credit histories.

The following table provides the number and dollar volume of Woori's innovative or flexible loan originations inside its assessment area by loan program and year.

Innovative or Flexible Lending Programs										
Loan Program	2020		2021		2022		YTD 2023		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
SBA PPP	767	32,422	2,263	71,401	--	--	--	--	3,030	103,823
SBA (non-PPP)	11	7,536	28	23,108	51	55,864	11	13,622	101	100,130
Affordable Housing Program	10	2,386	5	1,392	4	698	2	328	21	4,804
Secured Credit Cards	129	340	128	307	132	327	24	91	413	1,065
Totals	917	42,684	2,424	96,208	187	56,889	37	14,041	3,565	209,822
<i>Source: Bank Records</i>										

Additionally, Woori provided several lending-related flexibilities to business and retail customers that experienced financial hardship during the COVID-19 pandemic. These flexibilities included loan forbearance, loan modifications, credit line increases, and waivers of credit card late payment fees. Through its payment forbearance program, the bank assisted more than 300 customers experiencing financial hardship.

Community Development Loans

Woori made an adequate level of community development loans. The bank’s community development lending performance varied among the rated areas. Woori had adequate performance in the New York–New Jersey assessment area, which is the most heavily weighted assessment area. Although Woori achieved good performance in its California and Texas assessment areas, it made a low level of community development loans in several assessment areas, including Virginia, Pennsylvania, and Maryland, which negatively affected the bank’s performance under this criterion.

During the evaluation period, the bank originated 36 community development loans totaling \$99 million. This level of lending represents 3.1 percent of total assets and 4.2 percent of total loans as of March 31, 2023. Comparatively, during the previous evaluation period, the bank originated 27 community development loans totaling \$55.8 million, which represented 2.7 percent of total assets and 3.3 percent of total loans as of September 30, 2019. By dollar volume, the bank’s community development lending increased by 77.5 percent since the previous evaluation.

Woori’s community development lending primarily supported affordable housing and the revitalization/stabilization of low- and moderate-income areas, both of which are significant community development needs throughout the bank’s assessment areas. Among all seven assessment areas, the California assessment area had the highest volume of community development lending by dollar volume (47.5 percent), followed by the New York–New Jersey assessment area (35.8 percent).

The following table presents the bank’s community development lending by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020 (partial)	10	10,885	0	0	0	0	2	17,300	12	28,185
2021	6	4,879	0	0	0	0	3	12,796	9	17,675
2022	4	10,602	1	2,175	2	4,465	6	30,305	13	47,547
Year-to-date 2023	1	2,000	1	3,575	0	0	0	0	2	5,575
Total	21	28,366	2	5,750	2	4,465	11	60,401	36	98,982

Source: Bank Records

Refer to the separate assessment area sections of this evaluation for more information on the bank’s community development lending in those areas.

INVESTMENT TEST

The Investment Test rating is High Satisfactory. Woori’s performance under the Investment and Grant Activity and Responsiveness to Credit and Community Development Needs criteria primarily supports the rating. The conclusions regarding the bank’s overall Investment Test performance were consistent with the conclusions for all rated areas except for the California assessment area, which exceeded the overall rating.

Refer to separate assessment area sections of this evaluation for detailed assessments of the bank’s Investment Test performance.

Investment and Grant Activity

Woori has a significant level of qualified community development investments and donations. Investments and donations for the evaluation period totaled \$72.2 million, representing 2.3 percent of total assets and 35.8 percent of total securities, as of March 31, 2023. This investment and donation activity represents an increase of 78.1 percent by dollar volume compared to the prior evaluation. During the prior evaluation period, the bank made qualified investments and donations of \$40.5 million, which represented 2.0 percent of total assets and 19.7 percent of total securities as of September 30, 2019.

Qualified investments include 20 prior-period investments totaling \$16.6 million, 48 new investments totaling \$55.4 million, and 92 donations totaling \$201,000. By dollar amount, the largest portion of qualified investments were in the California assessment area (30.7 percent), followed by the New York–New Jersey assessment area (21.6 percent).

The majority of the bank’s qualified investments supported affordable housing. These investments included mortgage-backed securities, housing bonds, mutual fund investments, and investments in low-income housing tax credit (LIHTC) projects. The remainder of the bank’s qualified investments and donations supported economic development, revitalization/stabilization efforts, or community services for low- and moderate-income individuals.

The following table illustrates the bank’s qualified investments by year and purpose.

Qualified Investments and Donations										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	17	13,489	1	1,020	0	0	2	2,050	20	16,559
2020 (partial)	0	0	8	2,064	0	0	0	0	8	2,064
2021	9	13,812	0	0	0	0	0	0	9	13,812
2022	27	35,290	2	1,698	0	0	2	2,541	31	39,529
Year-to-date 2023	0	0	0	0	0	0	0	0	0	0
Subtotal	53	62,591	11	4,782	0	0	4	4,591	68	71,964
Grants & Donations	29	66	30	55	27	68	6	12	92	201
Total	82	62,657	41	4,837	27	68	10	4,603	160	72,165
<i>Source: Bank Data</i>										

Responsiveness to Credit and Community Development Needs

Woori exhibits good responsiveness to the credit and community development needs of the assessment areas. Qualified investments primarily responded to the assessment areas’ identified needs for affordable housing, revitalization/stabilization, and community services for low- and moderate-income individuals.

Community Development Initiatives

Woori occasionally uses complex investments to support community development initiatives. During the evaluation period, the bank made various investments supporting LIHTC and municipal projects within the assessment areas. These investments are complex and account for a sizeable portion of the bank’s total qualified investments. The remainder of Woori’s qualified investments are not particularly innovative or complex; however, they are responsive to assessment area community development needs.

SERVICE TEST

The Service Test rating is High Satisfactory. Woori’s performance under the Accessibility of Delivery Systems, Changes in Branch Locations, and Reasonableness of Business Hours and Services criteria primarily supports the rating. The conclusions regarding the bank’s overall Service Test performance were consistent with the conclusions for the New York – New Jersey and California assessment areas, which are the most heavily weighted areas, and for the Georgia assessment area. The remaining assessment areas reflected performance that was lower than the overall performance.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the bank's assessment areas. Woori operates 21 full-service offices and 24 ATMs throughout its assessment areas. All ATMs are located at office locations, with three offices having two ATMs. The percentage of bank branches in the low- and moderate-income tracts is generally proportional with the percentages of assessment area residents that live in those tracts, especially within the New York–New Jersey and California assessment areas, where most of the bank's branches are located.

The income classification for several census tracts where the bank maintains branches changed due to the 2020 U.S. Census data. However, these changes did not have a significant effect on the overall distribution of bank branches among tract income categories. Currently, the bank maintains two more offices in moderate-income tracts compared to the previous evaluation, which is partially a result of new branch openings. The overall number of offices in the low-, middle-, and upper-income tracts has not changed since the previous evaluation.

The bank's alternative delivery systems also promote the availability of banking services to its entire customer base, including low- and moderate-income customers. As noted previously, the bank operates 24 ATMs, with free usage for Woori customers. In addition to the ATMs, alternative delivery systems include free online banking, mobile banking, person-to-person payment services, and remote deposit. The bank's website includes information on these alternative delivery systems, and the bank has informed customers of their availability through lobby notices and other general communications. Given that all of the bank's assessment areas are located in major metropolitan areas, examiners determined that a lack of broadband internet access does not significantly affect customers' ability to use internet-based alternative delivery systems.

Refer to the separate assessment area sections of this evaluation for more information on the accessibility of the bank's delivery systems. However, since the bank's alternative delivery systems are available to customers in all of its assessment areas, this evaluation discusses these systems only at the institution level.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank's total number of full-service offices increased from 19 to 21 during the evaluation period. As detailed in the following table, this net gain of two offices includes three branch openings in moderate-income tracts and one branch closing in a low-income tract.

Net Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Income Level of Census Tract (+/-)			
			Low	Moderate	Middle	Upper
New York–New Jersey	0	0	0	0	0	0
California	2*	2*	-1	+2	-1	0
Virginia	0	0	0	0	0	0
Pennsylvania	0	0	0	0	0	0
Maryland	0	0	0	0	0	0
Texas	1	0	0	0	+1	0
Georgia	1	0	0	+1	0	0
Total	4	2	-1	+3	0	0

*Source: Bank Data. *Includes one branch relocation, reflected as one opening and one closing.*

The branch closure in a low-income tract was the result of an office relocation in the California assessment area. The bank relocated an office from a low-income tract in Los Angeles to a nearby moderate-income tract approximately three blocks away. As such, this closure did not significantly affect branch accessibility in this predominantly low- and moderate-income neighborhood. Additionally, the bank demonstrated strong performance under this criterion in the Georgia assessment area, where the bank opened a branch in a portion of Gwinnett County where there is a high concentration of low- and moderate-income tracts.

Refer to the separate assessment area sections of this evaluation for more information on the opening and closing of branches.

Reasonableness of Business Hours and Services

Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies or individuals. Business hours and product and service offerings are substantially similar across all of the bank’s assessment areas.

Woori offers several loan and deposit products that are particularly beneficial to low- and moderate-income customers. As noted in the Innovative or Flexible Lending Practices section of this evaluation, the bank continues to offer several lending programs that meet the needs of low- and moderate-income customers and small businesses. These include SBA loans, the bank’s Affordable Housing Program loans, and secured credit cards.

Additionally, the bank continues to offer the Dream Checking account. This basic checking account product is beneficial to low- and moderate-income customers, as it has no monthly maintenance fees or minimum balance requirements, and customers can open the account with a deposit of only \$25. The bank also offers a Student Access Checking account that includes no monthly maintenance fees, no minimum balance requirements, and no minimum deposit to open the account. The bank does not charge transaction fees for ACH or check transactions for either the Dream Checking or Student Access Checking products. All of the bank’s checking account products include instant-issue debit cards and free access to internet banking services, including bill pay.

Finally, Woori provided several deposit-related flexibilities to business and retail customers during the COVID-19 pandemic. Throughout 2020 and 2021, the bank waived overdraft fees, nonsufficient funds fees, and certificate of deposit early withdrawal fees. These fee waivers assisted customers experiencing financial hardship during the pandemic.

Refer to the separate assessment area sections of this evaluation for more information on the bank’s performance under this criterion.

Community Development Services

Woori provided an adequate level of community development services. During the evaluation period, bank employees provided 268 instances of financial expertise or technical assistance to community development-related organizations. This represents an increase from the 154 instances provided during the prior evaluation period. The bank’s community development services primarily supported community services for low- and moderate-income individuals. Most of these services were financial literacy programs targeted to low- and moderate-income individuals, including students and the elderly. Financial literacy is a specific community development need throughout the bank’s assessment areas.

The following table details the number of community development services by year and community development purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020 (Partial)	0	27	11	0	38
2021	3	32	0	0	35
2022	0	152	4	0	156
Year-to-date 2023	0	35	4	0	39
Total	3	246	19	0	268
<i>Source: Bank Data</i>					

Refer to the separate assessment area sections of this evaluation for more information on the bank’s community development services in those areas.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners reviewed the bank’s compliance with the laws relating to discrimination and other illegal credit practices, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

NEW YORK–NEW JERSEY – Full-Scope Review

CRA RATING FOR NEW YORK–NEW JERSEY: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NEW YORK–NEW JERSEY

The New York–New Jersey assessment area includes six whole counties, including Bergen County in New Jersey and Bronx, Kings, Nassau, New York, and Queens Counties in New York. The assessment area contains the four most populous New York City boroughs, along with suburban portions of New Jersey and Long Island, New York.

All six counties are contiguous and form part of the New York–Newark–Jersey City, NY-NJ-PA MSA. More specifically, Nassau County is part of the Nassau County–Suffolk County, NY Metropolitan Division, and the five other counties are part of the New York–Jersey City–White Plains, NY-NJ Metropolitan Division. The bank added Bronx County, Kings County, and Nassau County to this assessment area since the previous evaluation.

Woori operates nine full-service offices in this assessment area, which is unchanged from the previous evaluation. Four offices are in Bergen County, four are in Queens County, and the bank’s main office is in New York County (Manhattan).

Among all seven assessment areas, the bank’s performance in this assessment area carried the most weight when arriving at overall conclusions. This is because more of the bank’s operations and lending activity are in this assessment area than in any other assessment area.

Economic and Demographic Data

The assessment area contains 2,690 census tracts across the six counties. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 292 low-income tracts
- 603 moderate-income tracts
- 881 middle-income tracts
- 762 upper-income tracts
- 152 tracts with no income designation

The following table details select demographic and economic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: New York–New Jersey						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,690	10.9	22.4	32.8	28.3	5.7
Population by Geography	10,659,949	13.2	24.1	31.8	29.7	1.2
Housing Units by Geography	4,171,047	12.6	22.1	30.3	33.9	1.1
Owner-Occupied Units by Geography	1,519,942	2.7	14.1	38.8	43.7	0.6
Occupied Rental Units by Geography	2,296,615	19.7	27.8	25.5	25.6	1.5
Vacant Units by Geography	354,490	8.4	19.2	25.1	45.8	1.4
Businesses by Geography	1,451,447	7.8	17.4	27.9	43.1	3.8
Family Distribution by Income Level	2,372,112	27.2	15.6	16.7	40.5	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$130,301	Median Housing Value Median Gross Rent Families Below Poverty Level			\$656,772 \$1,607 11.8%
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$85,483				
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to Moody’s Analytics, economic activity in the New York City metropolitan area continues to grow at a rate higher than the national average. Job growth remains strong overall, despite recent weaknesses and layoffs in the financial and technology sectors. Housing prices remain expensive, with a median housing value of more than \$656,000 in the assessment area, and housing therefore remains unaffordable for many low- and moderate-income borrowers. Approximately 55.0 percent of all housing units in the assessment area are occupied rental units.

Unemployment rates in the assessment area spiked in early 2020 with the onset of the COVID-19 pandemic. New York City was particularly impacted by the pandemic and related restrictions. For instance, unemployment in Bronx County reached a maximum of more than 25.0 percent in the early months of the pandemic. Unemployment in Kings County and Queens County also exceeded 20.0 percent at various points in 2020.

Following these initial spikes, unemployment rates declined steadily throughout most of the evaluation period. According to Bureau of Labor Statistics data as of February 2023, unemployment rates in the assessment area were lowest in Nassau County and Bergen County, which had rates of 3.0 percent and 3.4 percent, respectively. These rates were below the New York statewide unemployment rate of 4.5 percent for the same timeframe. Unemployment rates remain elevated in Bronx County (6.9 percent) and Kings County (5.4 percent). According to Moody’s Analytics, major employers in the assessment area include Montefiore Health System, Mount Sinai Health System, JPMorgan Chase & Co., and Bank of America.

Examiners used median family income levels to analyze 1-4 family home mortgage loans under the Borrower Profile criterion. The following table presents the median family income levels in the

New York–New Jersey assessment area for 2021 and 2022, as updated by the Federal Financial Institutions Examination Council (FFIEC).

Median Family Income Ranges				
Assessment Area: New York–New Jersey				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Nassau County-Suffolk County, NY Metropolitan Division Median Family Income (35004)				
2021 (\$129,900)	<\$64,950	\$64,950 to <\$103,920	\$103,920 to <\$155,880	≥\$155,880
2022 (\$146,400)	<\$73,200	\$73,200 to <\$117,120	\$117,120 to <\$175,680	≥\$175,680
New York-Jersey City-White Plains, NY-NJ Metropolitan Division Median Family Income (35614)				
2021 (\$85,500)	<\$42,750	\$42,750 to <\$68,400	\$68,400 to <\$102,600	≥\$102,600
2022 (\$99,000)	<\$49,500	\$49,500 to <\$79,200	\$79,200 to <\$118,800	≥\$118,800
<i>Source: FFIEC</i>				

Competition

The assessment area is a highly competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2022, 123 financial institutions operated 2,128 offices in the assessment area. Of these institutions, Woori ranked 46th with a deposit market share of less than 0.1 percent.

Significant competition also exists for home mortgage and small business loans in the assessment area. In 2021, 625 lenders reported 209,372 1-4 family HMDA loans originated or purchased. Additionally, 389 lenders reported 442,751 small business loans originated or purchased in 2021. Woori had market shares of less than 0.1 percent by number of loans for both products. Finally, 108 lenders reported 3,936 multifamily HMDA loans originated or purchased in 2021. Woori ranked sixtieth among this group of lenders with a market share of 0.1 percent by number of loans.

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to those needs. It also shows what credit and community development opportunities are available.

Examiners contacted a representative of a community development-related organization in the assessment area. The contact stated that small business loans, particularly small-dollar loans for new businesses, remain an enduring need. The contact stated that many entrepreneurs do not yet have the expertise or credit history to qualify for bank loans, and therefore they struggle to obtain financing. The contact observed that many banks offer beneficial loan products for small businesses, but banks often do not heavily market these products, and small business customers are unaware of their availability. The contact also stated that there is a shortage of single-family housing, and that housing in general in the New York City area remains unaffordable for many families. Finally, financial literacy programs, for both consumers and small businesses, represent another significant community development need in the assessment area.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, as well as demographic and economic data, examiners determined that small business lending and affordable housing are primary needs in the assessment area. Given the assessment area's high housing costs, affordable home mortgage products and down payment assistance are significant needs, particularly among low- and moderate-income residents. As noted by the community contact, additional financing for new businesses and financial literacy programs for both small businesses and consumers remain in demand. Finally, opportunities for revitalization and stabilization are present throughout the assessment area, particularly in certain areas of Bronx County, Kings County, and Queens County, all of which have large concentrations of low- and moderate-income tracts.

SCOPE OF EVALUATION – NEW YORK–NEW JERSEY

Examiners used full-scope examination procedures to evaluate Woori's performance in the New York–New Jersey assessment area. In addition to 1-4 family and small business lending, examiners evaluated the bank's multifamily lending in this assessment area given the volume of originations during the evaluation period. All other products, weighting, and timeframes described in the overall Scope of Evaluation section are applicable to this assessment area analysis.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NEW YORK–NEW JERSEY

LENDING TEST

The Lending Test rating is Low Satisfactory for the New York–New Jersey assessment area. The bank's performance under the Lending Activity, Geographic Distribution, Borrower Profile, and Community Development Lending criteria primarily supports this rating. The following sections discuss the bank's performance under each of the Lending Test factors.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. Examiners considered the significant level of lending competition in this assessment area, as well as challenges related to the COVID-19 pandemic throughout most of the evaluation period, when assessing the bank's performance under this criterion.

During 2021 and 2022, Woori reported 177 1-4 family home mortgage loans totaling \$118.2 million in this assessment area. According to 2021 aggregate HMDA data, the bank ranked 176th by number of loans among the 625 HMDA reporters in the assessment area and had a 0.05 percent market share. The top three 1-4 family home mortgage lenders in the assessment area in 2021, by number of loans, were JPMorgan Chase Bank, N.A., Wells Fargo Bank, N.A., and Rocket Mortgage, with a combined

market share of 23.6 percent. Woori's home mortgage lending by number of loans was relatively consistent with the prior evaluation, though it increased by dollar volume.

Woori also extended multifamily loans in this assessment area, though at a much lower volume than the 1-4 family home mortgage lending. During 2021 and 2022, the bank reported seven multifamily loans totaling \$15 million. According to 2021 aggregate HMDA data, the bank ranked sixtieth by number of loans among the 108 HMDA reporters in the assessment area and had a 0.13 percent market share. The top three multifamily lenders in the assessment area in 2021, by number of loans, were JPMorgan Chase Bank, N.A., New York Community Bank, and Signature Bank, with a combined market share of 39.1 percent.

During 2021 and 2022, Woori originated 989 small business loans totaling \$51 million in this assessment area. The bank's large volume of PPP lending in 2021 supported adequate performance under this criterion, with a substantial majority of its small business lending that year consisting of PPP loans. According to the 2021 aggregate small business loan data, the bank ranked 32nd by number of loans among the 389 institutions that reported small business loans in the assessment area. Woori's small business lending volume in 2022 declined significantly with the expiration of the PPP in 2021, and was generally lower than in the years reflected in the prior evaluation.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. Although 1-4 family lending performance was poor, adequate small business and multifamily lending performance supports the overall conclusion.

1-4 Family Home Mortgage Loans

The geographic distribution of 1-4 family loans reflects poor penetration throughout the assessment area. Lending in the low-income tracts was below both aggregate and demographic data in 2021. Lending in the low-income tracts improved slightly in 2022, but still slightly trailed the demographic data. Similarly, lending in the moderate-income tracts was several percentage points below both aggregate and demographic data in 2021, and lending in these tracts declined further in 2022.

The following table displays the distribution of 1-4 family loans by tract income level.

Geographic Distribution of 1-4 Family Home Mortgage Loans Assessment Area: New York–New Jersey							
Tract Income Level		% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2021	2.7	2.8	1	1.1	686	1.1
	2022	2.7	--	2	2.4	397	0.8
Moderate							
	2021	13.0	12.0	9	9.5	4,984	7.6
	2022	14.1	--	5	6.1	2,225	4.2
Middle							
	2021	38.2	35.2	21	22.1	10,079	15.4
	2022	38.8	--	25	30.5	12,930	24.4
Upper							
	2021	45.9	49.8	64	67.4	49,592	75.9
	2022	43.7	--	50	61.0	37,339	70.6
Not Available							
	2021	0.2	0.2	0	0.0	0	0.0
	2022	0.6	--	0	0.0	0	0.0
Totals							
	2021	100.0	100.0	95	100.0	65,341	100.0
	2022	100.0	--	82	100.0	52,891	100.0
<i>Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>							

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in the low- and moderate-income tracts was several percentage points below both aggregate and demographic data in 2021. However, the geographic distribution was stronger in 2022, which does not include any PPP lending and is more reflective of the bank's ordinary small business lending patterns. Small business lending in both the low- and moderate-income tracts exceeded demographic data in 2022.

The following table displays the distribution of small business loans by tract income level.

Geographic Distribution of Small Business Loans						
Assessment Area: New York–New Jersey						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	7.6	7.2	26	2.7	2,015	4.6
2022	7.8	--	3	18.8	979	13.9
Moderate						
2021	18.7	18.5	149	15.3	6,598	15.0
2022	17.4	--	3	18.8	1,250	17.7
Middle						
2021	27.3	28.2	345	35.5	12,390	28.2
2022	27.9	--	4	25.0	1,790	25.4
Upper						
2021	44.6	44.3	442	45.4	22,573	51.3
2022	43.1	--	5	31.2	2,328	33.0
Not Available						
2021	1.9	1.9	11	1.1	385	0.9
2022	3.8	--	1	6.2	700	9.9
Totals						
2021	100.0	100.0	973	100.0	43,961	100.0
2022	100.0	--	16	100.0	7,047	100.0
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Multifamily Home Mortgage Loans

The geographic distribution of multifamily loans reflects adequate penetration throughout the assessment area. Although the bank did not originate any multifamily loans in the low-income tracts, lending in the moderate-income tracts supports overall reasonable performance, especially considering the bank’s low overall volume of multifamily loans by number.

Woori originated 60.0 percent of its multifamily loans in the moderate-income tracts in 2021, which significantly exceeded both the demographic and aggregate percentages. Multifamily lending in the assessment area decreased to two total loans in 2022, neither of which were located in moderate-income tracts. Additionally, although not reflected in the following table, the bank originated four multifamily loans in 2020; two of these loans totaling \$2.6 million were located in moderate-income tracts. Overall, the bank’s lending in the moderate-income tracts supports adequate performance under this criterion.

The following table displays the distribution of the bank’s multifamily loans by tract income level.

Geographic Distribution of Multifamily Home Mortgage Loans Assessment Area: New York–New Jersey							
Tract Income Level		% of Multifamily Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2021	19.1	15.4	0	0.0	0	0.0
	2022	19.2	--	0	0.0	0	0.0
Moderate							
	2021	26.1	33.3	3	60.0	5,780	51.2
	2022	24.0	--	0	0.0	0	0.0
Middle							
	2021	18.7	19.7	0	0.0	0	0.0
	2022	20.3	--	1	50.0	730	19.6
Upper							
	2021	35.7	31.5	2	40.0	5,500	48.8
	2022	35.1	--	1	50.0	3,000	80.4
Not Available							
	2021	0.4	0.1	0	0.0	0	0.0
	2022	1.5	--	0	0.0	0	0.0
Totals							
	2021	100.0	100.0	5	100.0	11,280	100.0
	2022	100.0	--	2	100.0	3,730	100.0
Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%							

Borrower Profile

The distribution of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different sizes. Although small business performance was good, the adequate performance for the more heavily weighted 1-4 family lending supports the overall conclusion.

1-4 Family Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels. The bank did not originate any loans to low-income borrowers in 2021 or 2022; however, this is reasonable given the very high cost of housing in the assessment area and the low level of aggregate lending to borrowers in this income category. Lending to moderate-income borrowers primarily supports adequate performance under this criterion. Lending to moderate-income borrowers was slightly above aggregate data in 2021 and increased by several percentage points in 2022.

The following table displays the distribution of loans by borrower income level.

Distribution of 1-4 Family Home Mortgage Loans by Borrower Income Level Assessment Area: New York–New Jersey						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	29.4	1.7	0	0.0	0	0.0
2022	27.2	--	0	0.0	0	0.0
Moderate						
2021	16.0	9.0	9	9.5	2,811	4.3
2022	15.6	--	10	12.2	2,908	5.5
Middle						
2021	16.4	20.1	19	20.0	8,109	12.4
2022	16.7	--	11	13.4	4,069	7.7
Upper						
2021	38.3	57.0	57	60.0	43,748	67.0
2022	40.5	--	53	64.6	33,910	64.1
Not Available						
2021	0.0	12.3	10	10.5	10,673	16.3
2022	0.0	--	8	9.8	12,004	22.7
Totals						
2021	100.0	100.0	95	100.0	65,341	100.0
2022	100.0	--	82	100.0	52,891	100.0
<i>Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The distribution of borrowers reflects good penetration among business customers of different sizes. The bank’s lending to businesses with revenues of \$1 million or less was more than double the aggregate level in 2021. Following the expiration of PPP, the bank’s lending performance remained high in 2022, with more than two-thirds of the bank’s loans originated to businesses with revenues of \$1 million or less.

The following table displays the distribution of small business loans by revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: New York–New Jersey						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤\$1,000,000						
2021	91.4	36.6	718	73.8	15,729	35.8
2022	91.8	--	11	68.8	4,597	65.2
>\$1,000,000						
2021	3.5	--	172	17.7	17,436	39.7
2022	3.2	--	5	31.3	2,450	34.8
Revenue Not Available						
2021	5.1	--	83	8.5	10,796	24.6
2022	5.0	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	973	100.0	43,961	100.0
2022	100.0	--	16	100.0	7,047	100.0

*Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Community Development Loans

Woori made an adequate level of community development loans in the assessment area. During the evaluation period, the bank originated 10 community development loans totaling \$35.4 million. This activity represented 35.8 percent of the bank’s totaling community development lending by dollar volume. Total community development lending in this assessment area increased by \$18.9 million since the previous evaluation period. During the current evaluation period, all of the bank’s community development loans supported either affordable housing or the revitalization/stabilization of low- and moderate-income areas, both of which are community development needs in this assessment area.

The following table details the bank’s community development lending in the New York–New Jersey assessment area by year and purpose.

Community Development Lending										
Assessment Area: New York–New Jersey										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020 (partial)	4	3,880	0	0	0	0	1	11,500	5	15,380
2021	1	870	0	0	0	0	1	1,076	2	1,946
2022	0	0	0	0	0	0	3	18,120	3	18,120
Year-to-date 2023	0	0	0	0	0	0	0	0	0	0
Total	5	4,750	0	0	0	0	5	30,696	10	35,446

Source: Bank Records

The following are examples of the bank's community development loans in this assessment area.

- In 2020, the bank originated an \$11.5 million loan that refinanced a commercial property and funded renovations on another commercial property, both of which are located in moderate-income tracts and Opportunity Zones in Queens. This loan helped stabilize the area, as it supported business attraction and retention in moderate-income areas.
- In 2021, the bank originated a \$1.1 million SBA loan to a start-up restaurant in a moderate-income tract in Queens. This loan supported revitalization by attracting a new business to this moderate-income area.
- Throughout the evaluation period, the bank originated five loans totaling \$4.8 million for the purchase or refinance of multifamily properties. These loans supported the provision of affordable housing, as a majority of the units in each property had below-market rents.

INVESTMENT TEST

The Investment Test rating is High Satisfactory for the New York–New Jersey assessment area. The bank's performance under the Investment and Grant Activity criterion primarily supports this rating. The following sections discuss the bank's performance under each of the Investment Test factors.

Investment and Grant Activity

Woori has a significant level of qualified community development investments and grants in the New York–New Jersey assessment area. The bank had qualified investments of \$15.2 million in this assessment area, including 6 prior period investments of \$3.2 million, 12 new investments of \$11.8 million, and 41 grants totaling \$104,000. This activity accounts for 21.0 percent of the bank's total qualified investments.

The following are examples of the bank's qualified investments within the assessment area.

- During the evaluation period, Woori made four investments totaling \$2.6 million in multi-family housing revenue bonds with a New York City housing organization. The bank also maintained prior-period investments totaling \$1 million with the same entity. Bond proceeds helped create and preserve affordable housing for low-, moderate-, and middle-income individuals in New York City.
- In 2022, Woori made a \$1 million investment in a municipal bond with a New Jersey nonprofit organization. Bond proceeds supported a down payment assistance program for low-income homebuyers.
- In 2022, the bank donated \$4,000 to an affordable housing organization in New York City. The organization is a certified Community Development Financial Institution and provides various housing services to low- and moderate-income individuals, including loan originations, homeownership counseling, foreclosure prevention, and down payment assistance.

Responsiveness to Credit and Community Development Needs

Woori’s qualified investments and donations exhibit good responsiveness to the credit and community development needs of the New York–New Jersey assessment area. By dollar volume, more than 80.0 percent of the bank’s investments supported affordable housing, which is a significant need in the assessment area. Most of the remaining investments supported the revitalization or stabilization of low- and moderate-income areas, which represents another community development need in the assessment area.

Community Development Initiatives

Woori rarely uses innovative or complex investments to support community development initiatives in the New York–New Jersey assessment area. Although the bank’s qualified investments were responsive to the area’s credit and community development needs, they were not particularly innovative or complex.

SERVICE TEST

The Service Test rating is High Satisfactory for the New York–New Jersey assessment area. The bank’s performance under the Accessibility of Delivery Systems, Reasonableness of Business Hours and Services, and Community Development Services criteria supports this rating. The following sections discuss the bank’s performance under each of the Service Test factors.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the assessment area. Conclusions regarding the branch distribution are consistent with the institution overall. As shown in the following table, Woori operates one branch in a low-income tract and two branches in moderate-income tracts. Additionally, one of Woori’s branches in New Jersey is located in an upper-income tract that is immediately adjacent to a neighboring moderate-income tract.

Branch Distribution by Geography Income Level Assessment Area: New York–New Jersey						
Tract Income Level	Census Tracts		Population		Bank Branches	
	#	%	#	%	#	%
Low	292	10.9	1,410,290	13.2	1	11.1
Moderate	603	22.4	2,565,838	24.1	2	22.2
Middle	881	32.8	3,392,424	31.8	2	22.2
Upper	762	28.3	3,168,771	29.7	4	44.4
N/A	152	5.6	122,626	1.2	0	0.0
Total	2,690	100.0	10,659,949	100.0	9	100.0

Source: 2020 U.S. Census, 2022 Peer Deposit Data, and Bank Records. Due to rounding, totals may not equal 100.0.

As shown in the table above, the percentage of bank branches in the low- and moderate-income tracts is comparable to the percentages of assessment area residents that live in those tracts.

Additionally, most of Woori’s branches in this assessment area are located near public transportation, e.g., New York City subway, which further helps facilitate branch access for low- and moderate-income customers.

Woori’s alternative delivery systems in this assessment area are consistent with the institution overall. Refer to the Service Test section for the overall institution for a discussion of the alternative delivery systems and how they may benefit low- and moderate-income geographies or low- and moderate-income individuals.

Changes in Branch Locations

The bank did not open or close any branches in this assessment area during the evaluation period. Therefore, this criterion did not affect the Service Test rating.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. Performance in this assessment area is consistent with the institution’s overall performance. Business hours are 9:00 a.m. to 5:00 p.m. on Monday through Friday for all offices. ATMs are available both during and outside of normal business hours, with all ATMs providing service until at least 9:00 p.m. each day. Several ATMs are available 24 hours a day, including one ATM in a moderate-income tract. Loan and deposit product offerings are consistent across all offices.

Community Development Services

Woori provided a relatively high level of community development services in the New York–New Jersey assessment area. During the evaluation period, bank employees provided 161 instances of community development services. This represents an increase from the 114 instances provided during the prior evaluation period. The bank’s community development services primarily focused on community services for low- and moderate-income individuals, as well as economic development.

The following table summarizes the bank’s community development services by year and purpose.

Community Development Services Assessment Area: New York–New Jersey					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020 (Partial)	0	18	11	0	29
2021	0	14	0	0	14
2022	0	85	4	0	89
2023 year to date	0	25	4	0	29
Total	0	142	19	0	161
<i>Source: Bank Data</i>					

The following are examples of the bank's community development services in this assessment area.

- During 2022, four employees presented a financial seminar at a nonprofit organization that provides education, job training, and food to homeless and low-income individuals. The financial seminar included information on basic banking services and identity theft prevention. The organization serves the New Jersey portion of the bank's assessment area.
- In 2022, bank employees conducted two financial education events at a nonprofit community services organization that serves low- and moderate-income elderly and disabled individuals in Bergen County. The seminar discussed the prevention of financial exploitation of elderly and impaired individuals.
- In 2022 and 2023, bank employees participated in a seminar at a nonprofit organization that provides education and mentorship to small business owners and entrepreneurs. The organization primarily serves New York County and Queens County.

CALIFORNIA – Full-Scope Review

CRA RATING FOR CALIFORNIA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN CALIFORNIA

The California assessment area includes two contiguous whole counties: Los Angeles and Orange. Los Angeles County makes up the Los Angeles–Long Beach–Glendale, CA Metropolitan Division. Orange County makes up the Anaheim–Santa Ana–Irvine, CA Metropolitan Division. Together, these two Metropolitan Divisions form the entirety of the Los Angeles–Long Beach–Anaheim, CA MSA. The assessment area delineation is unchanged from the previous evaluation.

Woori operates six full-service offices in this assessment area. At the previous evaluation, the bank also operated six offices in the assessment area. However, since then, the bank opened one office, closed one office, and relocated one office. Currently, three offices are in Los Angeles County, and three are in Orange County.

Economic and Demographic Data

The assessment area contains 3,112 census tracts across the two counties. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 178 low-income tracts
- 856 moderate-income tracts
- 926 middle-income tracts
- 1,071 upper-income tracts
- 81 tracts with no income designation

The following table details select demographic and economic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: California						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,112	5.7	27.5	29.8	34.4	2.6
Population by Geography	13,200,998	5.2	28.3	30.9	34.4	1.1
Housing Units by Geography	4,661,034	4.8	25.4	29.8	38.7	1.3
Owner-Occupied Units by Geography	2,129,700	1.4	17.1	31.6	49.6	0.3
Occupied Rental Units by Geography	2,242,805	8.2	33.8	28.7	27.3	2.0
Vacant Units by Geography	288,529	4.4	21.4	25.3	46.4	2.4
Businesses by Geography	1,796,581	3.4	18.6	27.3	48.1	2.6
Farms by Geography	17,110	2.5	17.9	29.1	49.0	1.5
Family Distribution by Income Level	2,953,482	23.7	16.5	17.9	41.9	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA		\$106,451	Median Housing Value Median Gross Rent Families Below Poverty Level			\$696,400 \$1,676 9.6%
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA		\$80,317				

Source: 2020 U.S. Census and 2022 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.

According to Moody’s Analytics, economic growth in the Los Angeles metropolitan area remains healthy, and employment growth slightly outpaced statewide and national trends toward the end of 2022 and in early 2023. Healthcare, professional/business services, and hospitality have been the main drivers of employment growth in recent months. Housing prices remain expensive: the assessment area’s median housing value of nearly \$700,000 is the highest among all seven of Woori’s assessment areas. As such, these high costs limit opportunities to extend home mortgage loans to low- and moderate-income borrowers. Approximately 48.0 percent of all housing units in the assessment area are occupied rental units, compared to 46.0 percent of units that are owner-occupied.

Unemployment rates in the assessment area spiked in early 2020 with the onset of the COVID-19 pandemic. For instance, in May 2020, unemployment rates in both Los Angeles County and Orange County exceeded 15.0 percent. Unemployment has since declined. According to Bureau of Labor Statistics data as of February 2023, the unemployment rate in Los Angeles County was 5.2 percent, slightly above the California statewide rate of 4.8 percent for the same timeframe. Unemployment in Orange County was 3.4 percent, which was below the statewide rate.

The Los Angeles metropolitan area has a diverse local economy, with major industries including healthcare, technology, and entertainment, among others. According to Moody’s Analytics, major employers in the assessment area include Cedars-Sinai Medical Center; Los Angeles International Airport; University of California, Los Angeles; and The Walt Disney Company.

The following table presents the FFIEC-updated median family income levels in the California assessment area for 2021 and 2022.

Median Family Income Ranges Assessment Area: California				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Anaheim-Santa Ana-Irvine, CA Metropolitan Division Median Family Income (11244)				
2021 (\$106,700)	<\$53,350	\$53,350 to <\$85,360	\$85,360 to <\$128,040	≥\$128,040
2022 (\$119,100)	<\$59,550	\$59,550 to <\$95,280	\$95,280 to <\$142,920	≥\$142,920
Los Angeles-Long Beach-Glendale, CA Metropolitan Division Median Family Income (31084)				
2021 (\$80,000)	<\$40,000	\$40,000 to <\$64,000	\$64,000 to <\$96,000	≥\$96,000
2022 (\$91,100)	<\$45,550	\$45,550 to <\$72,880	\$72,880 to <\$109,320	≥\$109,320
<i>Source: FFIEC</i>				

Competition

The assessment area is a highly competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2022, 109 financial institutions operated 2,144 offices in the assessment area. Of these, Woori ranked 61st with a deposit market share of less than 0.1 percent.

Significant competition also exists for home mortgage and small business loans in the assessment area. In 2021, 922 lenders reported 641,185 1-4 family HMDA loans originated or purchased. Additionally, 353 lenders reported 603,813 small business loans originated or purchased in 2021. Finally, 110 lenders reported 6,861 multifamily HMDA loans originated or purchased in 2021. Woori had market shares of 0.1 percent or less by number of loans for all three products.

Community Contact

Examiners reviewed a recent contact with a local economic development organization active in the assessment area. The contact noted that the local economy, particularly in southeastern Los Angeles County, is performing well. The contact noted that unemployment continues to decline as the effects of the pandemic recede. Healthcare, manufacturing, and transportation are important drivers of local economic activity. The contact stated that affordable housing is a significant need, not just for the low- and moderate-income population, but for middle-income individuals as well. Small business loans are another primary need, especially for micro-businesses and start-ups.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, as well as demographic and economic data, examiners determined that affordable housing is a primary need in the assessment area, particularly given the area's high housing costs. Financing for start-ups and other small businesses is another significant need. Finally, opportunities for revitalization and stabilization are present throughout the assessment area, particularly in the areas near downtown Los Angeles and in northwestern Orange County, both of which have high concentrations of low- and moderate-income tracts.

SCOPE OF EVALUATION – CALIFORNIA

Examiners used full-scope examination procedures to evaluate Woori's performance in the California assessment area. In addition to 1-4 family and small business lending, examiners evaluated the bank's multifamily lending in this assessment area given the volume of originations during the evaluation period. All other products, weighting, and timeframes described in the overall Scope of Evaluation section are applicable to this assessment area analysis.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CALIFORNIA

LENDING TEST

The Lending Test rating is High Satisfactory for the California assessment area. The bank's performance under the Geographic Distribution and Community Development Lending criteria primarily supports this rating. The following sections discuss the bank's performance under each of the Lending Test factors.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. Examiners considered the significant level of lending competition in this assessment area, as well as challenges related to the COVID-19 pandemic throughout most of the evaluation period, when assessing the bank's performance under this criterion.

During 2021 and 2022, Woori reported 38 1-4 family home mortgage loans totaling \$29.1 million in this assessment area. According to 2021 aggregate HMDA data, the bank ranked 531st by number of loans among the 922 HMDA reporters in the assessment area. The top three 1-4 family home mortgage lenders in the assessment area in 2021, by number of loans, were Rocket Mortgage, United Wholesale Mortgage, and LoanDepot.com LLC, with a combined market share of 22.6 percent. Woori's home mortgage lending volume by number of loans was generally lower than that shown in the prior evaluation.

Woori also extended multifamily loans in this assessment area, though at a much lower volume than the 1-4 family home mortgage lending. During 2021 and 2022, the bank reported 12 multifamily loans totaling \$14.3 million. According to 2021 aggregate HMDA data, the bank ranked 50th by number of loans among the 110 HMDA reporters in the assessment area and had a 0.13 percent market share. The top three multifamily lenders in the assessment area in 2021, by number of loans, were JPMorgan Chase Bank, N.A., First Republic Bank, and First Foundation Bank, with a combined market share of 57.5 percent.

During 2021 and 2022, Woori originated 368 small business loans totaling \$26.2 million in this assessment area. The bank's large volume of PPP lending in 2021 supported adequate performance under this criterion, with a substantial majority of its small business lending that year consisting of PPP loans. According to the 2021 aggregate small business loan data, the bank ranked 64th by number of loans among the 353 institutions that reported small business loans in the assessment

area. Woori’s small business lending volume in 2022 declined significantly with the expiration of the PPP in 2021, and was generally lower than in the years reflected in the prior evaluation.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the assessment area. The good distribution of 1-4 family, small business, and multifamily loans all support this conclusion.

1-4 Family Home Mortgage Loans

The geographic distribution of 1-4 family loans reflects good penetration throughout the assessment area. Lending in the low-income tracts exceeded the aggregate data in 2021 and the demographic data in both 2021 and 2022. In the moderate-income tracts, the bank’s lending slightly trailed aggregate data in 2021, but the overall percentage of lending in moderate-income tracts increased in 2022 and slightly exceeded demographic data for that year.

The following table displays the distribution of 1-4 family loans by tract income level.

Geographic Distribution of 1-4 Family Home Mortgage Loans						
Assessment Area: California						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	2.7	2.4	1	4.8	1,355	8.4
2022	1.4	--	1	5.9	333	2.6
Moderate						
2021	17.6	15.8	3	14.3	1,255	7.8
2022	17.1	--	3	17.6	2,934	22.7
Middle						
2021	27.5	26.8	4	19.0	2,567	15.9
2022	31.6	--	4	23.5	2,436	18.8
Upper						
2021	52.2	54.5	13	61.9	10,996	68.0
2022	49.6	--	7	41.2	4,913	38.0
Not Available						
2021	0.1	0.5	0	0.0	0	0.0
2022	0.3	--	2	11.8	2,320	17.9
Totals						
2021	100.0	100.0	21	100.0	16,173	100.0
2022	100.0	--	17	100.0	12,936	100.0

*Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Small Business Loans

The geographic distribution of small business loans reflects good penetration throughout the assessment area. In 2021, the bank’s lending exceeded aggregate and demographic data in both the low- and moderate-income tracts. The bank did not originate any small business loans in the low-income tracts in 2022, but this is reasonable given the bank’s low small business lending volume that year and the small percentage of businesses located in the low-income tracts. Lending in the moderate-income tracts was notably stronger, with more than half of the bank’s 2022 lending occurring in moderate-income tracts.

The following table displays the distribution of small business loans by tract income level.

Geographic Distribution of Small Business Loans						
Assessment Area: California						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	4.9	4.8	37	10.2	1,512	6.7
2022	3.4	--	0	0.0	0	0.0
Moderate						
2021	19.3	19.9	113	31.3	8,114	36.2
2022	18.6	--	4	57.1	2,050	54.3
Middle						
2021	24.7	25.5	106	29.4	4,856	21.7
2022	27.3	--	1	14.3	511	13.5
Upper						
2021	49.3	48.3	102	28.3	7,878	35.2
2022	48.1	--	2	28.6	1,212	32.1
Not Available						
2021	1.9	1.5	3	0.8	52	0.2
2022	2.6	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	361	100.0	22,412	100.0
2022	100.0	--	7	100.0	3,773	100.0

*Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Multifamily Home Mortgage Loans

The geographic distribution of multifamily loans reflects good penetration throughout the assessment area. The bank originated one multifamily loan, or 11.1 percent of total loans, in a low-income tract in 2021, which slightly trailed the demographic data and was several percentage points below aggregate data. The bank did not originate any multifamily loans in the low-income tracts in

2022, which is reasonable considering that the bank only originated three total multifamily loans in this assessment area in 2022.

The bank’s lending in moderate-income tracts primarily supports good performance under this criterion. In both 2021 and 2022, the bank’s lending in the moderate-income tracts significantly exceeded comparable demographic data. Lending in moderate-income tracts in 2021 was also 18.6 percentage points above the aggregate level. The following table displays the distribution of the bank’s multifamily loans by tract income level.

Geographic Distribution of Multifamily Home Mortgage Loans						
Assessment Area: California						
Tract Income Level	% of Multifamily Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	12.4	15.1	1	11.1	475	5.4
2022	8.8	--	0	0.0	0	0.0
Moderate						
2021	31.2	37.0	5	55.6	3,854	44.1
2022	30.7	--	2	66.7	2,050	36.9
Middle						
2021	23.6	22.2	0	0.0	0	0.0
2022	27.1	--	1	33.3	3,500	63.1
Upper						
2021	31.6	25.1	3	33.3	4,415	50.5
2022	30.5	--	0	0.0	0	0.0
Not Available						
2021	1.2	0.6	0	0.0	0	0.0
2022	2.9	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	9	100.0	8,744	100.0
2022	100.0	--	3	100.0	5,550	100.0

*Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Borrower Profile

The distribution of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different sizes. Although 1-4 family lending performance was poor, the bank’s excellent performance for small business lending supports the overall adequate conclusion.

1-4 Family Home Mortgage Loans

The distribution of borrowers reflects poor penetration among retail customers of different income levels. Although the bank originated two loans to low-income borrowers in 2022, the bank originated no loans to low-income borrowers in 2021. Lending to moderate-income borrowers was also weak. The bank originated one loan to a moderate-income borrower in 2021, trailing aggregate and demographic data. The bank’s lending to moderate-income borrowers declined to zero loans in 2022.

The following table displays the distribution of loans by borrower income level.

Distribution of 1-4 Family Home Mortgage Loans by Borrower Income Level						
Assessment Area: California						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	24.4	3.2	0	0.0	0	0.0
2022	23.7	--	2	11.8	484	3.7
Moderate						
2021	16.3	7.8	1	4.8	290	1.8
2022	16.5	--	0	0.0	0	0.0
Middle						
2021	17.0	16.6	2	9.5	680	4.2
2022	17.9	--	2	11.8	496	3.8
Upper						
2021	42.3	56.0	16	76.2	13,168	81.4
2022	41.9	--	12	70.6	11,676	90.3
Not Available						
2021	0.0	16.4	2	9.5	2,035	12.6
2022	0.0	--	1	5.9	280	2.2
Totals						
2021	100.0	100.0	21	100.0	16,173	100.0
2022	100.0	--	17	100.0	12,936	100.0

*Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Small Business Loans

The distribution of borrowers reflects excellent penetration among business customers of different sizes. The bank’s lending to businesses with revenues of \$1 million or less was 30.6 percentage points above the aggregate level in 2021. Although overall lending volume declined sharply in 2022 following the expiration of PPP, the bank’s lending to businesses with revenues of \$1 million

or less increased as a percentage of total lending. The bank’s lending was only several percentage points below the demographic data in 2022.

The following table displays the distribution of small business loans by revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: California						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤\$1,000,000						
2021	90.6	45.3	274	75.9	6,261	27.9
2022	91.7	--	6	85.7	3,473	92.0
>\$1,000,000						
2021	3.8	--	78	21.6	12,820	57.2
2022	3.2	--	1	14.3	300	8.0
Revenue Not Available						
2021	5.6	--	9	2.5	3,331	14.9
2022	5.1	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	361	100.0	22,412	100.0
2022	100.0	--	7	100.0	3,773	100.0
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Community Development Loans

Woori made a relatively high level of community development loans in the assessment area. During the evaluation period, the bank originated 21 community development loans totaling \$47 million. This activity represented 47.5 percent of the bank’s totaling community development lending by dollar volume. Total community development lending in this assessment area increased by 32.5 percent by dollar volume compared to the previous evaluation period.

The following table details the bank’s community development lending in the California assessment area by year and purpose.

Community Development Lending Assessment Area: California										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020 (partial)	5	6,495	0	0	0	0	1	5,800	6	12,295
2021	5	4,009	0	0	0	0	2	11,720	7	15,729
2022	2	4,300	1	2,175	2	4,465	2	4,435	7	15,375
YTD 2023	0	0	1	3,575	0	0	0	0	1	3,575
Total	12	14,804	2	5,750	2	4,465	5	21,955	21	46,974

Source: Bank Records

The following are examples of the bank’s community development loans in this assessment area.

- In 2021, the bank originated a \$9.2 million loan that financed the purchase of a retail/office building located in a moderate-income tract and Opportunity Zone in Los Angeles. The loan helped stabilize the area, as it supported business retention in this predominantly low- and moderate-income area.
- In 2022, the bank originated a \$1.1 million SBA loan that allowed a manufacturing business to refinance a commercial mortgage and purchase equipment. The loan supported economic development, as it allowed this small business to create and retain jobs for low- and moderate-income individuals. The business is also located in a moderate-income tract in Los Angeles County.
- Throughout the evaluation period, the bank originated 12 loans totaling \$14.8 million to borrowers for the purchase or refinance of multifamily residential properties. These loans supported the provision of affordable housing, as a majority of units in each property had below-market rents.

INVESTMENT TEST

The Investment Test rating is Outstanding for the California assessment area. The bank’s strong performance under each of the Investment Test criteria supports this rating. The following sections discuss the bank’s performance under each of the Investment Test factors.

Investment and Grant Activity

Woori has an excellent level of qualified community development investments and grants in the California assessment area. The bank had qualified investments of \$21.7 million in this assessment area, including 5 prior-period investments of \$7.3 million, 10 new investments of \$14.4 million, and 18 grants totaling \$33,000. This activity accounts for 30.0 percent of the bank’s total qualified investments. Woori’s qualified investments in this assessment area primarily supported affordable housing, economic development, and community services for low- and moderate-income individuals.

The following are examples of the bank’s qualified investments within the assessment area.

- In 2022, the bank funded a \$5 million investment in a housing development revenue bond. The bond proceeds supported the construction and permanent financing of an affordable housing development in Los Angeles. The bank’s equity allocation provided for 183 affordable housing units for low- and moderate-income families.
- During the evaluation period, the bank maintained a \$500,000 municipal bond investment with the City of Los Angeles. Bond proceeds funded initiatives to develop affordable housing for the housing insecure and homeless. The bond also supported facilities to increase access to mental health care and drug rehabilitation.

Responsiveness to Credit and Community Development Needs

Woori’s qualified investments and donations exhibit excellent responsiveness to the credit and community development needs of the California assessment area. A substantial majority of the bank’s investments supported affordable housing, which is a significant need in the assessment area. Other investments supported the revitalization or stabilization of low- and moderate-income areas, as well as community services for low- and moderate-income individuals, which also represent community development needs in the assessment area.

Community Development Initiatives

Woori makes significant use of innovative or complex investments to support community development in the California assessment area. Specifically, the bank maintains complex LIHTC investments in this area. Most of the remaining investments in this assessment area were not particularly innovative or complex, but these investments were responsive to the area’s community development needs.

SERVICE TEST

The Service Test rating is High Satisfactory for the California assessment area. The bank’s performance under the Accessibility of Delivery Systems, Reasonableness of Business Hours and Services, and Changes in Branch Locations criteria primarily supports this rating. The following sections discuss the bank’s performance under each of the Service Test factors.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the assessment area. Conclusions regarding the branch distribution in this assessment area differed from the conclusions for the institution overall, as branch accessibility in this assessment area was generally better. As shown in the following table, Woori operates two-thirds of its branches in low- and moderate-income tracts.

Branch Distribution by Geography Income Level						
Assessment Area: California						
Tract Income Level	Census Tracts		Population		Bank Branches	
	#	%	#	%	#	%
Low	178	5.7	690,846	5.2	1	16.7
Moderate	856	27.5	3,735,465	28.3	3	50.0
Middle	926	29.8	4,083,946	31.0	1	16.7
Upper	1,071	34.4	4,542,994	34.4	1	16.7
N/A	81	2.6	147,747	1.1	0	0.0
Total	3,112	100.0	13,200,998	100.0	6	100.0

Source: 2020 U.S. Census, 2022 Peer Deposit Data, and Bank Records. Due to rounding, totals may not equal 100.0.

As shown in the table above, Woori has one branch in a low-income tract and three branches in the moderate-income tracts. The percentage of bank branches in the low- and moderate-income tracts substantially exceeds the percentages of assessment area residents that live in those tracts.

Woori’s alternative delivery systems in this assessment area are consistent with the institution overall. Refer to the Service Test section for the overall institution for a discussion of the alternative delivery systems and how they may benefit low- and moderate-income geographies or low- and moderate-income individuals.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.

During the evaluation period, the bank relocated one branch office in this assessment area. The relocation had a minimal impact on branch accessibility, as the office moved from a low-income tract to a moderate-income tract approximately three blocks away. The bank also opened one new branch office and closed one existing branch office, both in the northwestern portion of Orange County. The new branch is in a moderate-income tract, which will improve accessibility to services in that area. The closed branch was in a middle-income tract, although it was in close proximity to several moderate-income tracts. Overall, the branch opening and closing had a relatively neutral effect on overall branch accessibility in this assessment area.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. Performance in this assessment area is consistent with the institution’s overall performance. Business hours are 9:00 a.m. to 5:00 p.m. on Monday through Friday for all offices, except for one office in a moderate-income tract that is open from 9:30 a.m. to 5:30 p.m. Additionally, ATMs are located at each branch location, and all are available 24 hours a day. Loan and deposit product offerings are consistent across all offices.

Community Development Services

Woori provided an adequate level of community development services throughout the California assessment area. During the evaluation period, bank employees engaged in 36 instances of community development services. This represents an increase from the 17 instances provided during the prior evaluation period. The bank's community development services solely focused on community services for low- and moderate-income individuals.

The following are examples of the bank's community development services in this assessment area.

- During 2022, two employees conducted a financial seminar on elder financial abuse at an adult healthcare facility that primarily serves low- and moderate-income elderly and disabled individuals.
- In 2022, two employees provided a financial education seminar at an adult daycare facility that primarily serves elderly and disabled individuals and is located in a predominantly low- and moderate-income area. The seminars provided information on elderly financial abuse prevention and financial planning.

VIRGINIA – Full-Scope Review

CRA RATING FOR VIRGINIA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN VIRGINIA

The Virginia assessment area includes four whole counties (Arlington, Fairfax, Loudoun, and Prince William) and five independent cities (Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park). These nine jurisdictions are contiguous and form part of the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division, which is part of the broader Washington-Arlington-Alexandria, DC-VA-MD-WV MSA. Since the previous evaluation, the bank added Arlington, Loudoun, and Prince William counties to this assessment area. The bank also added the independent cities of Alexandria, Falls Church, Manassas, and Manassas Park.

Woori operates two full-service offices in this assessment area, both in Fairfax County, which is unchanged from the previous evaluation.

Economic and Demographic Data

The assessment area contains 579 census tracts. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 25 low-income tracts
- 84 moderate-income tracts
- 198 middle-income tracts
- 259 upper-income tracts
- 13 tracts with no income designation

The following table details select demographic and economic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: Virginia						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	579	4.3	14.5	34.2	44.7	2.2
Population by Geography	2,550,377	4.6	15.9	33.7	45.4	0.4
Housing Units by Geography	928,235	4.5	16.1	34.9	43.9	0.6
Owner-Occupied Units by Geography	580,190	1.9	12.2	32.8	52.9	0.2
Occupied Rental Units by Geography	307,124	9.2	22.8	38.8	27.9	1.3
Vacant Units by Geography	40,921	5.9	21.3	35.2	36.9	0.7
Businesses by Geography	386,654	2.8	13.4	33.1	50.1	0.6
Farms by Geography	5,618	2.3	14.1	31.7	51.7	0.2
Family Distribution by Income Level	602,778	17.7	15.0	19.6	47.7	0.0
Household Distribution by Income Level	0	0.0	0.0	0.0	0.0	0.0
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$126,224	Median Housing Value Median Gross Rent Families Below Poverty Level			\$526,754 \$1,913 3.9%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to Moody’s Analytics, economic growth in the Washington-Arlington-Alexandria MSA continues to recover, with healthy job growth and low unemployment levels, especially in Northern Virginia. The assessment area’s local economy remains reliant on federal government employment, and the area has become a hub for the technology industry. Housing prices remain high in the assessment area, with a median housing value of more than \$500,000, which limits the opportunity to lend to low- and moderate-income residents.

Unemployment rates in the assessment area declined throughout much of the evaluation period following elevated rates at the onset of the COVID-19 pandemic. Currently, unemployment is generally low in the assessment area. According to Bureau of Labor Statistics data as of February 2023, unemployment was below 3.0 percent in all counties and cities in the assessment area. The highest unemployment rate was in Prince William County, at 2.7 percent, which is still below the Virginia statewide rate of 2.9 percent for this same timeframe. According to Moody’s Analytics, major employers in Northern Virginia include Inova Health System, SAIC Inc., and Booz Allen Hamilton.

The following table presents the FFIEC-updated median family income levels in the Virginia assessment area for 2021 and 2022.

Median Family Income Ranges				
Assessment Area: Virginia				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Washington-Arlington-Alexandria, DC-VA-MD-WV Median Family Income (47894)				
2021 (\$122,100)	<\$61,050	\$61,050 to <\$97,680	\$97,680 to <\$146,520	≥\$146,520
2022 (\$139,700)	<\$69,850	\$69,850 to <\$111,760	\$111,760 to <\$167,640	≥\$167,640
<i>Source: FFIEC</i>				

Competition

The assessment area is a moderately competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2022, 47 financial institutions operated 535 offices in the assessment area. Of these, Woori ranked 27th with a deposit market share of 0.2 percent.

Significant competition exists for home mortgage and small business loans in the assessment area. In 2021, 711 lenders reported 200,663 1-4 family HMDA loans originated or purchased. Additionally, 238 lenders reported 84,159 small business loans originated or purchased in 2021. By number of loans, Woori had a 1-4 family market share of less than 0.1 percent and a small business market share of 0.2 percent.

Community Contact

Examiners reviewed a recent contact with a local economic development organization active in the assessment area. In general, the contact noted Northern Virginia’s strong local economy and plentiful job opportunities. The contact stated that the area’s unemployment rate is below the national average, and several large companies have relocated their operations to this area. The contact identified several local initiatives to increase the availability of affordable housing in the area, indicating a need for additional affordable housing.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, as well as demographic and economic data, examiners determined that affordable housing is a primary need in the assessment area, especially given the area’s high housing costs in relation to other major metropolitan areas. Affordable home mortgage products, down payment assistance, and affordable rental housing represent specific needs in the assessment area, especially for low- and moderate-income residents.

SCOPE OF EVALUATION – VIRGINIA

Examiners used full-scope examination procedures to evaluate Woori’s performance in the Virginia assessment area. All products, weighting, and timeframes described in the overall Scope of Evaluation section are applicable to this assessment area analysis.

CONCLUSIONS ON PERFORMANCE CRITERIA IN VIRGINIA

LENDING TEST

The Lending Test rating is Low Satisfactory for the Virginia assessment area. The bank's performance under the Lending Activity and Geographic Distribution criteria primarily supports this rating. The following sections discuss the bank's performance under each of the Lending Test factors.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs.

During 2021 and 2022, Woori reported 37 1-4 family home mortgage loans totaling \$17.9 million in this assessment area. According to 2021 aggregate HMDA data, the bank ranked 395th by number of loans among the 711 HMDA reporters in the assessment area and had a market share of less than 0.01 percent. The top three 1-4 family home mortgage lenders in the assessment area in 2021, by number of loans, were Rocket Mortgage, Truist Bank, and Wells Fargo Bank, N.A., with a combined market share of 14.9 percent. Woori's home mortgage lending in this assessment area by number of loans was higher than the prior evaluation.

During 2021 and 2022, Woori originated 200 small business loans totaling \$8.5 million in this assessment area. The bank's PPP lending in 2021 supported adequate performance under this criterion, with a large portion of its small business lending that year consisting of PPP loans. According to the 2021 aggregate small business loan data, the bank ranked 31st by number of loans among the 238 institutions that reported small business loans in the assessment area. Woori's small business lending volume in 2022 declined significantly with the expiration of the PPP in 2021, but was still generally higher than in the years reflected in the prior evaluation.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distributions of both 1-4 family and small business loans reflect adequate performance.

1-4 Family Home Mortgage Loans

The geographic distribution of 1-4 family loans reflects adequate penetration throughout the assessment area. The bank did not originate any loans in low-income tracts in 2021 or 2022, but this is reasonable given the very low percentages of owner-occupied housing units and aggregate lending in those tracts. In moderate-income tracts, the bank's performance was comparable to aggregate and demographic data in 2021, and improved further in 2022.

The following table displays the distribution of 1-4 family loans by tract income level.

Geographic Distribution of 1-4 Family Home Mortgage Loans							
Assessment Area: Virginia							
Tract Income Level		% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2021	1.1	1.1	0	0.0	0	0.0
	2022	1.9	--	0	0.0	0	0.0
Moderate							
	2021	10.5	9.7	1	10.0	139	2.2
	2022	12.2	--	5	18.5	1,217	10.5
Middle							
	2021	31.7	30.1	4	40.0	1,334	21.1
	2022	32.8	--	13	48.1	5,776	49.6
Upper							
	2021	56.7	59.0	5	50.0	4,838	76.7
	2022	52.9	--	9	33.3	4,650	39.9
Not Available							
	2021	0.0	0.0	0	0.0	0	0.0
	2022	0.2	--	0	0.0	0	0.0
Totals							
	2021	100.0	100.0	10	100.0	6,311	100.0
	2022	100.0	--	27	100.0	11,643	100.0
Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%							

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. This conclusion is primarily based on the bank's performance in 2021, in which the bank's lending exceeded aggregate and demographic data in the low-income tracts and was comparable to both the aggregate and demographic data in the moderate-income tracts. With no PPP lending in 2022, overall lending volume declined significantly to just five loans, none of which were located in low- or moderate-income tracts.

The following table displays the distribution of small business loans by tract income level.

Geographic Distribution of Small Business Loans							
Assessment Area: Virginia							
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%	
Low							
2021	2.2	2.2	7	3.6	145	2.2	
2022	2.8	--	0	0.0	0	0.0	
Moderate							
2021	11.6	11.7	21	10.8	587	9.0	
2022	13.4	--	0	0.0	0	0.0	
Middle							
2021	33.3	34.4	94	48.2	2,981	45.4	
2022	33.1	--	3	60.0	1,500	78.1	
Upper							
2021	52.7	51.6	73	37.4	2,846	43.4	
2022	50.1	--	2	40.0	420	21.9	
Not Available							
2021	0.1	0.1	0	0.0	0	0.0	
2022	0.6	--	0	0.0	0	0.0	
Totals							
2021	100.0	100.0	195	100.0	6,559	100.0	
2022	100.0	--	5	100.0	1,920	100.0	
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>							

Borrower Profile

The distribution of borrowers reflects excellent penetration among retail customers of different income levels and business customers of different sizes. Although small business performance was good, the bank's excellent performance for the more heavily weighted 1-4 family lending supports the overall conclusion.

1-4 Family Home Mortgage Loans

The distribution of borrowers reflects excellent penetration among retail customers of different income levels. Lending to low-income borrowers was significantly above aggregate data in 2021 and increased further in 2022. Although lending to moderate-income borrowers trailed aggregate data in 2021, performance increased by 12.2 percentage points in 2022, exceeding demographic data by 7.2 percentage points.

The following table displays the distribution of loans by borrower income level.

Distribution of 1-4 Family Home Mortgage Loans by Borrower Income Level						
Assessment Area: Virginia						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	17.1	5.2	2	20.0	375	5.9
2022	17.7	--	6	22.2	1,551	13.3
Moderate						
2021	14.5	14.2	1	10.0	139	2.2
2022	15.0	--	6	22.2	1,377	11.8
Middle						
2021	19.7	20.5	2	20.0	449	7.1
2022	19.6	--	5	18.5	2,591	22.3
Upper						
2021	48.7	39.0	5	50.0	5,348	84.7
2022	47.7	--	10	37.0	6,124	52.6
Not Available						
2021	0.0	21.1	0	0.0	0	0.0
2022	0.0	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	10	100.0	6,311	100.0
2022	100.0	--	27	100.0	11,643	100.0
<i>Source: 2015 ACS, Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The distribution of borrowers reflects good penetration among business customers of different sizes. The bank's lending to businesses with revenues of \$1 million or less was 36.8 percentage points above the aggregate level in 2021. Although overall lending volume declined sharply in 2022 following the expiration of PPP, the bank's percentage of lending to businesses with revenues of \$1 million or less remained high at 80.0 percent.

The following table displays the distribution of small business loans by revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Virginia						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤\$1,000,000						
2021	90.1	49.4	168	86.2	3,218	49.1
2022	91.4	--	4	80.0	1,060	55.2
>\$1,000,000						
2021	3.6	--	22	11.3	2,711	41.3
2022	3.0	--	1	20.0	860	44.8
Revenue Not Available						
2021	6.3	--	5	2.6	630	9.6
2022	5.7	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	195	100.0	6,559	100.0
2022	100.0	--	5	100.0	1,920	100.0
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Community Development Loans

Woori made no community development loans in the Virginia assessment area during the evaluation period.

INVESTMENT TEST

The Investment Test rating is High Satisfactory for the Virginia assessment area. The bank’s performance under the Investment and Grant Activity and Responsiveness to Credit and Community Development Needs criteria primarily supports this rating. The following sections discuss the bank’s performance under each of the Investment Test factors.

Investment and Grant Activity

Woori has a significant level of qualified community development investments and grants. The bank funded 8 new qualified investments totaling \$9.9 million and made 11 qualified donations totaling \$27,000 during the review period. In addition, the bank maintained 1 prior period investment totaling approximately \$145,000. Most of the bank’s new qualified investments in this assessment area were mortgage-backed securities, primarily secured by mortgages to low- and moderate- income borrowers within the assessment area. The bank’s investment activity in this assessment area accounted for 13.9 percent of its total qualified investments.

The level of investments represents a significant increase in this assessment area when compared to the prior evaluation. During the prior evaluation period, the bank made total qualified investments

of \$731,000, representing 1.8 percent of its total qualified investments during the previous evaluation period.

Responsiveness to Credit and Community Development Needs

The bank's qualified investments and donations exhibit good responsiveness to the credit and community development needs of the Virginia assessment area. The bank's qualified investments and donations primarily supported affordable housing, which is a significant community development need in this assessment area.

Community Development Initiatives

The bank rarely uses innovative or complex investments to support community development in the Virginia assessment area. Most of the qualified investments in this assessment area were mortgage-backed securities, which are frequently used by other financial institutions and are not particularly innovative or complex.

SERVICE TEST

The Service Test rating is Low Satisfactory for the Virginia assessment area. The bank's performance under the Accessibility of Delivery Systems and Community Development Services criteria primarily supports this rating. The following sections discuss the bank's performance under each of the Service Test factors.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. Conclusions regarding the branch distribution in this assessment area differed from the conclusions for the institution overall, as branch accessibility in this assessment area was a little more limited. Woori maintains two offices in this assessment area, including one in a moderate-income tract and one in a middle-income tract. Both branches are located in close proximity to several other low- or moderate-income tracts.

Woori's alternative delivery systems in this assessment area are consistent with the institution overall. Refer to the Service Test section for the overall institution for a discussion of the alternative delivery systems and how they may benefit low- and moderate-income geographies or low- and moderate-income individuals.

Changes in Branch Locations

The bank did not open or close any branches in the Virginia assessment area during the evaluation period. Therefore, this criterion did not affect the Service Test rating.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. Performance in this assessment area is consistent with the institution's overall performance. Business hours for both offices are 9:00 a.m. to 5:00 p.m. on Monday through Friday. Both branches also have ATMs that are available 24 hours a day. Loan and deposit product offerings are consistent between the two offices.

Community Development Services

Woori provided an adequate level of community development services in the Virginia assessment area. During the evaluation period, bank employees engaged in 26 instances of community development services, which represents a slight increase from the previous evaluation. All of the bank's community development services supported community services for low- and moderate-income individuals. For example, in 2022, bank employees participated in three events to educate low- and moderate-income individuals on the prevention of the financial exploitation of elderly and impaired adults.

PENNSYLVANIA – Full-Scope Review

CRA RATING FOR PENNSYLVANIA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN PENNSYLVANIA

The Pennsylvania assessment area includes two contiguous whole counties: Montgomery and Philadelphia. Montgomery County is part of the Montgomery County–Bucks County–Chester County, PA Metropolitan Division. Philadelphia County is part of the Philadelphia, PA Metropolitan Division. The two Metropolitan Divisions are part of the broader Philadelphia–Camden–Wilmington, PA-NJ-DE-MD MSA. The assessment area delineation is unchanged from the previous evaluation.

Woori operates one full-service office within this assessment area in Montgomery County near the Philadelphia County line.

Economic and Demographic Data

The assessment area contains 627 census tracts across the two counties. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 57 low-income tracts
- 162 moderate-income tracts
- 196 middle-income tracts
- 178 upper-income tracts
- 34 tracts with no income designation

The following table details select demographic and economic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: Pennsylvania						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	627	9.1	25.8	31.3	28.4	5.4
Population by Geography	2,460,350	9.6	27.5	34.3	26.9	1.8
Housing Units by Geography	1,025,310	9.7	27.3	33.5	28.1	1.3
Owner-Occupied Units by Geography	552,780	6.8	23.3	39.4	29.6	0.8
Occupied Rental Units by Geography	378,993	12.6	31.0	27.6	27.0	1.8
Vacant Units by Geography	93,537	14.8	36.4	22.8	23.6	2.5
Businesses by Geography	369,480	6.8	22.2	32.7	36.1	2.1
Farms by Geography	3,757	4.8	17.3	45.1	31.5	1.3
Family Distribution by Income Level	548,325	25.9	17.9	18.8	37.4	0.0
Median Family Income MSA - 37964 Philadelphia, PA		\$68,458	Median Gross Rent Median Housing Value Families Below Poverty Level			\$1,186 \$252,385 12.7%
Median Family Income MSA - 33874 Montgomery County-Bucks County-Chester County, PA		\$117,345				

Source: 2020 U.S. Census and 2022 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.

According to Moody’s Analytics, Philadelphia’s economic growth and employment trends continue to lag nearly all other large metropolitan areas in the county. Economic growth in neighboring suburban Montgomery County has been relatively stronger. The healthcare industry has driven economic growth in both areas in recent years. With a median housing value of \$252,000, housing is more affordable in this assessment area compared to the nearby metropolitan areas of New York City and Washington, D.C. However, substantial portions of assessment area residents are of low or moderate income. At 12.7 percent, this assessment area has the highest percentage of families with incomes below the poverty level among all seven of Woori’s assessment areas.

Unemployment rates in the assessment area declined throughout much of the evaluation period following initial spikes at the onset of the COVID-19 pandemic. According to Bureau of Labor Statistics data as of February 2023, the unemployment rate in Philadelphia County was 5.3 percent, which was above the Pennsylvania statewide rate of 4.6 percent for the same timeframe. Unemployment in Montgomery County was 2.8 percent, which was below the statewide rate. According to Moody’s Analytics, major employers in the assessment area include University of Pennsylvania Health System, Thomas Jefferson University, Children’s Hospital of Philadelphia, Comcast, and Tower Health.

The following table presents the FFIEC-updated median family income levels in the Pennsylvania assessment area for 2021 and 2022.

Median Family Income Ranges Assessment Area: Pennsylvania				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Montgomery County-Bucks County-Chester County, PA Median Family Income (33874)				
2021 (\$116,300)	<\$58,150	\$58,150 to <\$93,040	\$93,040 to <\$139,560	≥\$139,560
2022 (\$131,400)	<\$65,700	\$65,700 to <\$105,120	\$105,120 to <\$157,680	≥\$157,680
Philadelphia, PA Median Family Income (37964)				
2021 (\$67,500)	<\$33,750	\$33,750 to <\$54,000	\$54,000 to <\$81,000	≥\$81,000
2022 (\$75,000)	<\$37,500	\$37,500 to <\$60,000	\$60,000 to <\$90,000	≥\$90,000
<i>Source: FFIEC</i>				

Competition

The assessment area is a moderately competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2022, 55 financial institutions operated 532 offices in the assessment area. Of these institutions, Woori ranked thirtieth with a deposit market share of 0.1 percent.

Significant competition exists for home mortgage and small business loans in the assessment area. In 2021, 692 lenders reported 106,294 1-4 family HMDA loans originated or purchased. Additionally, 226 lenders reported 68,530 small business loans originated or purchased in 2021. By number of loans, Woori had a 1-4 family market share of less than 0.1 percent and a small business market share of 0.6 percent.

Community Contacts

Examiners reviewed two recent contacts with community development-related organizations in the assessment area. The contacts identified affordable housing and small business lending as primary needs in the area. One contact noted extremely long waitlists for local affordable housing organizations, which demonstrates how significant the need is for affordable housing, particularly for low- and moderate-income families. Another contact identified a significant need for small business financing, particularly for newly established businesses. Many entrepreneurs struggle to qualify for traditional bank financing due to weak or limited credit histories.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, as well as demographic and economic data, examiners determined that small business lending and affordable housing are primary needs in the assessment area. Specifically, financing and technical assistance for new businesses remain in demand. Additionally, opportunities for revitalization and stabilization are present throughout the assessment area, particularly in areas like those directly north and west of Center City Philadelphia that have high concentrations of low- and moderate-income tracts.

SCOPE OF EVALUATION – PENNSYLVANIA

Examiners used full-scope examination procedures to evaluate Woori's performance in the Pennsylvania assessment area. All products, weighting, and timeframes described in the overall Scope of Evaluation section are applicable to this assessment area analysis.

CONCLUSIONS ON PERFORMANCE CRITERIA IN PENNSYLVANIA

LENDING TEST

The Lending Test rating is Low Satisfactory for the Pennsylvania assessment area. Although the bank demonstrated poor performance under the Geographic Distribution and Community Development Lending criteria, excellent Borrower Profile and adequate Lending Activity performance support the overall rating. The following sections discuss the bank's performance under each of the Lending Test factors.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs.

During 2021 and 2022, Woori reported 38 1-4 family home mortgage loans totaling \$9.7 million in this assessment area. According to 2021 aggregate HMDA data, the bank ranked 298th by number of loans among the 692 HMDA reporters in the assessment area and had a market share of 0.01 percent. The top three 1-4 family home mortgage lenders in the assessment area in 2021, by number of loans, were Rocket Mortgage, Wells Fargo Bank, N.A., and CBNA, with a combined market share of 16.1 percent. Woori's home mortgage lending in this assessment area varied by number of loans each year, but was generally consistent with the prior evaluation.

Woori originated one multifamily loan in this assessment area for \$3.3 million. Since the bank made the loan in 2022, there is no aggregate data available to determine its rank or market share.

During 2021 and 2022, Woori originated 435 small business loans totaling \$8.9 million in this assessment area. The bank's PPP lending in 2021 supported adequate performance under this criterion, with a large portion of its small business lending that year consisting of PPP loans. According to the 2021 aggregate small business loan data, the bank ranked 25th by number of loans among the 226 institutions that reported small business loans in the assessment area. Woori's small business lending volume in 2022 declined significantly with the expiration of the PPP in 2021, and was generally lower than in the years reflected in the prior evaluation.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the assessment area. Although small business lending performance was adequate, the bank's poor performance for the more heavily weighted 1-4 family lending primarily supports the overall conclusion.

1-4 Family Home Mortgage Loans

The geographic distribution of 1-4 family loans reflects poor penetration throughout the assessment area. In all years reviewed, lending in the low- and moderate-income tracts was well below aggregate and demographic data. The bank did not originate any loans in the low-income tracts during the evaluation period. The bank originated no loans in the moderate-income tracts in 2021 and three loans in 2022, which trailed the demographic data by 10.3 percentage points.

The following table displays the distribution of 1-4 family loans by tract income level.

Geographic Distribution of 1-4 Family Home Mortgage Loans Assessment Area: Pennsylvania							
Tract Income Level		% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2021	6.4	3.9	0	0.0	0	0.0
	2022	6.8	--	0	0.0	0	0.0
Moderate							
	2021	24.4	21.2	0	0.0	0	0.0
	2022	23.3	--	3	13.0	462	7.5
Middle							
	2021	39.4	41.0	9	60.0	1,931	53.2
	2022	39.4	--	9	39.1	1,894	30.9
Upper							
	2021	29.8	33.9	6	40.0	1,698	46.8
	2022	29.6	--	11	47.8	3,772	61.6
Not Available							
	2021	0.0	0.0	0	0.0	0	0.0
	2022	0.8	--	0	0.0	0	0.0
Totals							
	2021	100.0	100.0	15	100.0	3,629	100.0
	2022	100.0	--	23	100.0	6,127	100.0

*Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. This conclusion is primarily based on the bank's performance in 2021, in which the bank's lending exceeded aggregate and demographic data in both the low- and moderate-income tracts. With no PPP lending in 2022, overall lending volume declined significantly to just two loans, neither of which was located in a low- or moderate-income tract.

The following table displays the distribution of small business loans by tract income level.

Geographic Distribution of Small Business Loans						
Assessment Area: Pennsylvania						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	6.8	5.9	49	11.3	855	9.9
2022	6.8	--	0	0.0	0	0.0
Moderate						
2021	23.1	21.2	102	23.6	1,938	22.5
2022	22.2	--	0	0.0	0	0.0
Middle						
2021	33.1	35.5	163	37.6	2,696	31.3
2022	32.7	--	1	50.0	120	40.0
Upper						
2021	36.0	36.5	113	26.1	3,072	35.6
2022	36.1	--	1	50.0	180	60.0
Not Available						
2021	1.0	1.0	6	1.4	60	0.7
2022	2.1	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	433	100.0	8,621	100.0
2022	100.0	--	2	100.0	300	100.0
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Borrower Profile

The distribution of borrowers reflects excellent penetration among retail customers of different income levels and business customers of different sizes. Although small business performance was good, excellent performance for the more heavily weighted 1-4 family lending supports the overall conclusion.

1-4 Family Home Mortgage Loans

The distribution of borrowers reflects excellent penetration among retail customers of different income levels. Lending to low-income borrowers was 5.9 percentage points higher than aggregate data in 2021 and increased further in 2022. The bank's percentage of lending to moderate-income borrowers was more than triple the aggregate level in 2021, but declined in 2022.

The following table displays the distribution of loans by borrower income level.

Distribution of 1-4 Family Home Mortgage Loans by Borrower Income Level						
Assessment Area: Pennsylvania						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	26.2	7.4	2	13.3	240	6.6
2022	25.9	--	5	21.7	941	15.4
Moderate						
2021	17.9	17.3	8	53.3	2,079	57.3
2022	17.9	--	3	13.0	922	15.0
Middle						
2021	18.9	21.5	3	20.0	789	21.7
2022	18.8	--	7	30.4	1,259	20.5
Upper						
2021	37.0	37.8	2	13.3	521	14.4
2022	37.4	--	8	34.8	3,005	49.1
Not Available						
2021	0.0	16.1	0	0.0	0	0.0
2022	0.0	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	15	100.0	3,629	100.0
2022	100.0	--	23	100.0	6,127	100.0
<i>Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The distribution of borrowers reflects good penetration among business customers of different sizes. The bank's lending to businesses with revenues of \$1 million or less was more than double the aggregate level in 2021. Overall lending volume declined sharply in 2022 following the expiration of PPP, with the bank originating only two small business loans in that year. Despite this sharp decrease, both loans in 2022 were extended to businesses with revenues of \$1 million or less.

The following table displays the distribution of small business loans by revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Pennsylvania						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤\$1,000,000						
2021	91.4	43.5	381	88.0	4,772	55.4
2022	92.7	--	2	100.0	300	100.0
>\$1,000,000						
2021	3.0	--	39	9.0	2,908	33.7
2022	2.5	--	0	0.0	0	0.0
Revenue Not Available						
2021	5.6	--	13	3.0	941	10.9
2022	4.8	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	433	100.0	8,621	100.0
2022	100.0	--	2	100.0	300	100.0
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Community Development Loans

Woori made a low level of community development loans in this assessment area. During the evaluation period, the bank originated one community development loan totaling \$3.3 million, which supported affordable housing for low- and moderate-income individuals, as a majority of units in this multifamily property had below-market rents. This activity represented 3.3 percent of the bank’s totaling community development lending by dollar volume. Although the bank originated only one community development loan in this assessment area, this activity represents a 32.0 percent increase by dollar volume of community development lending compared to the prior evaluation period.

INVESTMENT TEST

The Investment Test rating is High Satisfactory for the Pennsylvania assessment area. The bank’s performance under the Investment and Grant Activity and Responsiveness to Credit and Community Development Needs criteria primarily supports this rating. The following sections discuss the bank’s performance under each of the Investment Test factors.

Investment and Grant Activity

Woori has a significant level of qualified community development investments and grants in the Pennsylvania assessment area. The bank had qualified investments of \$7.7 million in this assessment area, including three prior period investments of \$2 million, seven new investments of

\$5.7 million, and nine grants totaling \$15,000. This activity accounts for 10.7 percent of the bank's total qualified investments. Woori's qualified investments primarily supported affordable housing.

The following are examples of the bank's qualified investments within the assessment area.

- Woori maintained a prior period LIHTC investment with a national multifamily affordable housing syndicator. The bank's equity allocation provided for 585 affordable housing units for low- and moderate-income seniors in Philadelphia. This investment, with a current book value of \$1.3 million, was part of an original \$5 million bank commitment in 2015.
- In 2022, the bank invested \$1.5 million in a mortgage-backed security collateralized by home mortgage loans to low- and moderate-income individuals in Philadelphia.
- During the evaluation period, Woori made three donations totaling \$6,000 to a nonprofit organization that supports the revitalization and stabilization of low- and moderate-income neighborhoods in the Philadelphia area.

Responsiveness to Credit and Community Development Needs

The bank's qualified investments and donations exhibit good responsiveness to the credit and community development needs of the Pennsylvania assessment area. Qualified investments primarily supported affordable housing, which is a significant need in the assessment area.

Community Development Initiatives

Woori occasionally uses innovative or complex investments to support community development in the Pennsylvania assessment area. Woori's maintains one complex LIHTC investment in this area. The remainder of Woori's qualified investments in this assessment area are not particularly innovative or complex; however, they are responsive to the area's community development needs.

SERVICE TEST

The Service Test rating is Low Satisfactory for the Pennsylvania assessment area. The bank's performance under the Reasonableness of Hours and Services and the Community Development Services criteria primarily supports this rating. The following sections discuss the bank's performance under each of the Service Test factors.

Accessibility of Delivery Systems

Given Woori's single branch location and the large assessment area served by this office, delivery systems are accessible to limited portions of this assessment area. Conclusions regarding the branch distribution in this assessment area differed from the conclusions for the institution overall, as branch accessibility in this assessment area was generally more limited.

The bank's sole office in this assessment area is located in a middle-income tract approximately eight miles north of Center City Philadelphia. However, this tract is adjacent to three moderate-income tracts and one low-income tract. The branch is also located within two miles of numerous other low- and moderate-income tracts, which helps promote the accessibility of banking services in these areas.

Woori's alternative delivery systems in this assessment area are consistent with the institution overall. Refer to the Service Test section for the overall institution for a discussion of the alternative delivery systems and how they may benefit low- and moderate-income geographies or low- and moderate-income individuals.

Changes in Branch Locations

The bank did not open or close any branches in the Pennsylvania assessment area during the evaluation period. Therefore, this criterion did not affect the Service Test rating.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. Performance in this assessment area is consistent with the institution's overall performance. Business hours are 9:00 a.m. to 5:00 p.m. on Monday through Friday. The ATM in this assessment area is available seven days a week, both during and outside of normal business hours. Loan and deposit product offerings are consistent with the institution as a whole.

Community Development Services

Woori provided an adequate level of community development services in the Pennsylvania assessment area. During the evaluation period, bank employees engaged in 20 instances of community development service activities in this assessment area. This represents an increase from the eight instances provided during the prior evaluation period.

All of the community development services in this assessment area supported the provision of community services for low- and moderate-income individuals. For example, in 2021, three bank employees presented a financial education seminar at a nonprofit organization that primarily serves low- and moderate-income families by providing housing counseling, workshops, and financial assistance. Topics included strategies to raise credit scores and instruction on how to apply for home mortgage loans. Additionally, throughout the evaluation period, the bank provided multiple financial literacy programs in schools in which the majority of students qualify for free- or reduced-priced meals.

MARYLAND – Full-Scope Review

CRA RATING FOR MARYLAND: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN MARYLAND

The Maryland assessment area includes five whole counties (Anne Arundel, Baltimore, Howard, Montgomery, and Prince George’s) and one independent city (Baltimore city). These six jurisdictions are contiguous and are located within three different statistical areas: Baltimore city and Anne Arundel, Baltimore, and Howard Counties form part of the Baltimore–Columbia–Towson, MD MSA; Montgomery County is located in the Frederick–Gaithersburg–Rockville, MD Metropolitan Division; and Prince George’s County is located within the Washington–Arlington–Alexandria, DC-VA-MD-WV Metropolitan Division. Since the previous evaluation, the bank added Anne Arundel County, Baltimore city, Baltimore County, and Prince George’s County to this assessment area. Although the six jurisdictions comprising the assessment area are located within several different statistical areas, each area is encompassed within the Washington–Baltimore–Arlington, DC-MD-VA-WV-PA CSA.

Woori operates one full-service office in this assessment area, which is located in Howard County.

Economic and Demographic Data

The assessment area contains 1,053 census tracts. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 121 low-income tracts
- 300 moderate-income tracts
- 342 middle-income tracts
- 273 upper-income tracts
- 17 tracts with no income designation

The following table details select demographic and economic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: Maryland						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,053	11.5	28.5	32.5	25.9	1.6
Population by Geography	4,390,083	8.9	27.9	34.5	27.9	0.8
Housing Units by Geography	1,703,562	10.3	27.8	34.6	26.7	0.6
Owner-Occupied Units by Geography	1,007,955	4.8	22.2	38.2	34.6	0.2
Occupied Rental Units by Geography	567,929	17.3	36.9	30.2	14.5	1.0
Vacant Units by Geography	127,678	23.1	31.1	26.3	17.8	1.6
Businesses by Geography	609,770	6.5	24.2	37.5	31.4	0.5
Farms by Geography	8,711	4.3	20.7	35.8	38.7	0.5
Family Distribution by Income Level	1,020,584	23.3	17.9	20.9	37.9	0.0
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$126,224	Median Housing Value Median Gross Rent Families Below Poverty Level			\$351,423 \$1,482 6.1%
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$129,092				
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$104,637				

Source: 2020 U.S. Census and 2022 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.

According to Moody’s Analytics, the local economy in the Baltimore MSA has yet to return to pre-pandemic employment levels. Overall employment declined toward the end of 2022, and unfavorable population trends continue to affect economic and job growth. The local economy is relatively stronger in Montgomery County, which borders Washington, D.C. and is heavily reliant on federal government employment.

The assessment area contains a mix of affluent suburban areas and more distressed urban areas. Overall, 6.1 percent of assessment area families have incomes below the poverty level. However, in the city of Baltimore, that figure is 15.0 percent, and more than 60.0 percent of families in Baltimore are of low or moderate income.

According to Bureau of Labor Statistics data as of February 2023, the unemployment rates in the assessment area ranged from a low of 2.4 percent in Howard County to a high of 4.1 percent in Baltimore city. Maryland’s statewide unemployment rate was 3.1 percent for this same timeframe. According to Moody’s Analytics, major employers in the assessment area include Fort Meade, Johns Hopkins University and Health System, and the University of Maryland Medical System.

The following table presents the FFIEC-updated median family income levels in the Maryland assessment area for 2021 and 2022.

Median Family Income Ranges Assessment Area: Maryland				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Baltimore-Columbia-Towson, MD MSA Median Family Income (12580)				
2021 (\$105,100)	<\$52,550	\$52,550 to <\$84,080	\$84,080 to <\$126,120	≥\$126,120
2022 (\$116,100)	<\$58,050	\$58,050 to <\$92,880	\$92,880 to <\$139,320	≥\$139,320
Frederick-Gaithersburg-Rockville, MD Metropolitan Division Median Family Income (23224)				
2021 (\$129,900)	<\$64,950	\$64,950 to <\$103,920	\$103,920 to <\$155,880	≥\$155,880
2022 (\$143,900)	<\$71,950	\$71,950 to <\$115,120	\$115,120 to <\$172,680	≥\$172,680
Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division Median Family Income (47894)				
2021 (\$122,100)	<\$61,050	\$61,050 to <\$97,680	\$97,680 to <\$146,520	≥\$146,520
2022 (\$139,700)	<\$69,850	\$69,850 to <\$111,760	\$111,760 to <\$167,640	≥\$167,640

Source: FFIEC

Competition

The assessment area is a moderately competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2022, 48 financial institutions operated 824 offices in the assessment area. Of these, Woori ranked 39th with a deposit market share of less than 0.1 percent.

Significant competition exists for home mortgage and small business loans in the assessment area. In 2021, 711 lenders reported 269,581 1-4 family HMDA loans originated or purchased. Additionally, 259 lenders reported 132,092 small business loans originated or purchased in 2021. For both products, Woori had market shares of less than 0.1 percent by number of loans.

Community Contact

Examiners reviewed a recent contact with a local housing organization active in the assessment area. The contact stated that affordable housing for lower-income individuals is a substantial need. The contact observed an increasing trend of low-income clients needing foreclosure/eviction prevention and emergency rent assistance, especially as many pandemic-related assistance programs have ended. The contact identified financial literacy and down payment assistance as additional needs in the assessment area.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, as well as demographic and economic data, examiners determined that affordable housing is a primary need in the assessment area, as many residents struggle to afford housing costs. Opportunities for revitalization and stabilization are present throughout the assessment area, particularly in Baltimore and in the portions of Prince George's County near Washington, D.C., both of which have high concentrations of low- and moderate-income tracts. Furthermore, with 41.2 percent of assessment area families considered low or moderate income, community services for low- and moderate-income individuals remain in demand.

SCOPE OF EVALUATION – MARYLAND

Examiners used full-scope examination procedures to evaluate Woori's performance in the Maryland assessment area. All products, weighting, and timeframes described in the overall Scope of Evaluation section are applicable to this assessment area analysis.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MARYLAND

LENDING TEST

The Lending Test rating is Low Satisfactory for the Maryland assessment area. Although the bank demonstrated good performance under the Geographic Distribution and Borrower Profile criteria, Lending Activity performance was adequate and Community Development Lending performance was poor. The following sections discuss the bank's performance under each of the Lending Test factors.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs.

During 2021 and 2022, Woori reported 29 1-4 family home mortgage loans totaling \$7.6 million in this assessment area. According to 2021 aggregate HMDA data, the bank ranked 515th by number of loans among the 711 HMDA reporters in the assessment area and had a market share of less than 0.01 percent. The top three 1-4 family home mortgage lenders in the assessment area in 2021, by number of loans, were Rocket Mortgage, Truist Bank, and Pennymac Loan Services, LLC, with a combined market share of 15.5 percent. Woori's home mortgage lending in this assessment area by number of loans was higher than the prior evaluation.

During 2021 and 2022, Woori originated 97 small business loans totaling \$5 million in this assessment area. The bank's PPP lending in 2021 supported adequate performance under this criterion, with a large portion of its small business lending that year consisting of PPP loans. According to the 2021 aggregate small business loan data, the bank ranked 61st by number of loans among the 259 institutions that reported small business loans in the assessment area. Woori's small business lending volume in 2022 declined significantly with the expiration of the PPP in 2021, but was nonetheless higher than the volume reflected in the prior evaluation, which was zero.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the assessment area. Although small business lending performance was adequate, the bank's good performance for the more heavily weighted 1-4 family lending primarily supports the overall conclusion.

1-4 Family Home Mortgage Loans

The geographic distribution of 1-4 family loans reflects good penetration throughout the assessment area. The bank did not originate any loans in the low-income tracts in 2021, but performance

increased substantially in 2022, with the bank’s lending significantly exceeding the demographic data that year. In the moderate-income tracts, the bank’s lending was well above aggregate and demographic data in 2021 and remained consistent in terms of percentages in 2022.

The following table displays the distribution of 1-4 family loans by tract income level.

Geographic Distribution of 1-4 Family Home Mortgage Loans						
Assessment Area: Maryland						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	5.2	3.7	0	0.0	0	0.0
2022	4.8	--	5	20.8	976	15.8
Moderate						
2021	21.4	18.6	2	40.0	509	36.2
2022	22.2	--	9	37.5	1,967	31.8
Middle						
2021	36.5	37.4	1	20.0	136	9.7
2022	38.2	--	8	33.3	2,704	43.7
Upper						
2021	36.9	40.2	2	40.0	761	54.1
2022	34.6	--	2	8.3	540	8.7
Not Available						
2021	0.1	0.1	0	0.0	0	0.0
2022	0.2	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	5	100.0	1,406	100.0
2022	100.0	--	24	100.0	6,186	100.0

*Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. This conclusion is primarily based on the bank’s performance in 2021, in which the bank’s lending exceeded aggregate and demographic data in both low- and moderate-income tracts. With no PPP lending in 2022, overall lending volume declined significantly to just three loans, one of which was located in a moderate-income tract.

The following table displays the distribution of small business loans by tract income level.

Geographic Distribution of Small Business Loans Assessment Area: Maryland						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	6.7	5.5	8	8.5	199	5.5
2022	6.5	--	0	0.0	0	0.0
Moderate						
2021	22.7	20.9	24	25.5	1,650	45.3
2022	24.2	--	1	33.3	655	46.1
Middle						
2021	36.0	36.9	36	38.3	864	23.7
2022	37.5	--	2	66.7	765	53.9
Upper						
2021	34.2	36.3	26	27.7	926	25.4
2022	31.4	--	0	0.0	0	0.0
Not Available						
2021	0.4	0.3	0	0.0	0	0.0
2022	0.5	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	94	100.0	3,639	100.0
2022	100.0	--	3	100.0	1,420	100.0
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Borrower Profile

The distribution of borrowers reflects good penetration among retail customers of different income levels and business customers of different sizes. Performance was excellent for 1-4 family lending and adequate for small business lending, resulting in the overall conclusion of good performance.

1-4 Family Home Mortgage Loans

The distribution of borrowers reflects excellent penetration among retail customers of different income levels. Lending to low-income borrowers was significantly above aggregate and demographic data in 2021, and lending remained 10.0 percentage points above demographic data in 2022. Lending to moderate-income borrowers was similarly strong, at more than double the aggregate and demographic levels in 2021. Lending to moderate-income borrowers was 19.6 percentage points above the demographic level in 2022.

The following table displays the distribution of loans by borrower income level.

Distribution of 1-4 Family Home Mortgage Loans by Borrower Income Level						
Assessment Area: Maryland						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	23.9	8.3	2	40.0	258	18.4
2022	23.3	--	8	33.3	1,068	17.3
Moderate						
2021	17.8	19.2	2	40.0	761	54.1
2022	17.9	--	9	37.5	2,659	43.0
Middle						
2021	20.0	19.9	1	20.0	387	27.5
2022	20.9	--	4	16.7	1,100	17.8
Upper						
2021	38.3	29.4	0	0.0	0	0.0
2022	37.9	--	3	12.5	1,359	22.0
Not Available						
2021	0.0	23.2	0	0.0	0	0.0
2022	0.0	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	5	100.0	1,406	100.0
2022	100.0	--	24	100.0	6,186	100.0
<i>Source: 2015 ACS, Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The distribution of borrowers reflects adequate penetration among business customers of different sizes. The bank's lending to businesses with revenues of \$1 million or less was 35.2 percentage points above the aggregate level in 2021, and performance in that year primarily supports the overall conclusion. Overall small business lending volume declined sharply in 2022 following the expiration of PPP, and the bank extended only one of three loans to a business with revenues of \$1 million or less in that year.

The following table displays the distribution of small business loans by revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Maryland						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤\$1,000,000						
2021	90.2	46.7	77	81.9	1,914	52.6
2022	91.7	--	1	33.3	445	31.3
>\$1,000,000						
2021	3.3	--	14	14.9	1,693	46.5
2022	2.7	--	1	33.3	655	46.1
Revenue Not Available						
2021	6.5	--	3	3.2	32	0.9
2022	5.7	--	1	33.3	320	22.5
Totals						
2021	100.0	100.0	94	100.0	3,639	100.0
2022	100.0	--	3	100.0	1,420	100.0
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Community Development Loans

Woori made a low level of community development loans in the assessment area. The bank originated one community development loan in this assessment area during the evaluation period. The loan had an original amount of \$20 million and was secured by multifamily properties. Approximately 15.0 percent of the housing units were income-restricted and set aside for low- and moderate-income residents. As such, the bank received community development credit for 15.0 percent of the total loan amount, or \$3 million.

This activity represented 3.0 percent of the bank’s totaling community development lending by dollar volume. Although the bank originated only one community development loan, the qualified amount of \$3 million is more than double the dollar volume of community development lending in this assessment area during the prior evaluation period.

INVESTMENT TEST

The Investment Test rating is High Satisfactory for the Maryland assessment area. The bank’s good performance under each of the Investment Test criteria supports this rating. The following sections discuss the bank’s performance under each of the Investment Test factors.

Investment and Grant Activity

Woori has a significant level of qualified community development investments and grants in the Maryland assessment area. The bank made qualified investments of \$7.1 million in this assessment

area, including prior period investments of \$3.9 million, new investments of \$3.2 million, and grants totaling \$12,000. This activity accounts for 9.8 percent of the bank's total qualified investments. The majority of qualified investments in this assessment area, or approximately \$6.1 million, supported the provision of affordable housing.

As an example of the bank's qualified investments in this assessment area, in 2021, Woori invested \$195,000 in a LIHTC fund with a national multifamily affordable housing syndicator. The bank's equity allocation helped fund the development of four affordable housing developments, including a development for predominately low- and moderate-income seniors in Prince George's County.

Responsiveness to Credit and Community Development Needs

The bank's qualified investments and donations exhibit good responsiveness to the credit and community development needs of the Maryland assessment area. The bank's qualified investments primarily supported affordable housing, which is a significant community development need in this assessment area.

Community Development Initiatives

Woori makes significant use of innovative or complex investments to support community development in the Maryland assessment area. The bank continues to make complex LIHTC investments in this area.

SERVICE TEST

The Service Test rating is Low Satisfactory for the Maryland assessment area. Although Woori's performance under the Reasonableness of Business Hours and Services criteria was good, its performance was only adequate under the Community Services criterion and was poor under the Accessibility of Delivery Systems criterion, which affected the overall rating. The following sections discuss the bank's performance under each of the Service Test factors.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the assessment area. Conclusions regarding the branch distribution in this assessment area differed from the conclusions for the institution overall, as branch accessibility in this assessment area was generally more limited. The bank's sole office in this assessment area is located in an upper-income tract in a predominantly upper-income portion of Howard County. The office is located roughly ten miles or further from the largest concentrations of low- and moderate-income tracts in the assessment area, including those in Baltimore city and in Prince George's County near the border with Washington, D.C.

Woori's alternative delivery systems in this assessment area are consistent with the institution overall. Refer to the Service Test section for the overall institution for a discussion of the alternative delivery systems and how they may benefit low- and moderate-income geographies or low- and moderate-income individuals.

Changes in Branch Locations

The bank did not open or close any branches in the Maryland assessment area during the evaluation period. Therefore, this criterion did not affect the Service Test rating.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. Performance in this assessment area is consistent with the institution's overall performance. Business hours are 9:00 a.m. to 5:00 p.m. on Monday through Friday. The branch has an ATM that is available 24 hours a day. Loan and deposit product offerings are consistent with the institution as a whole.

Community Development Services

Woori provided an adequate level of community development services in the Maryland assessment area. During the evaluation period, bank employees provided 13 instances of community development services. This represents an increase from the seven instances provided during the prior evaluation period. All of the community development services in this assessment area supported the provision of community services for low- and moderate-income individuals.

The following are examples of the bank's community development services in this assessment area.

- In 2020, two employees provided a financial literacy education class at a high school in which a majority of the students qualify for the free- or reduced-price lunch program. Topics included budgeting and spending for essential needs.
- In 2021 and 2022, bank employees provided financial education seminars at adult daycare centers that primarily serve elderly low- and moderate-income individuals. The seminars provided information on elderly financial abuse and fraud prevention.

TEXAS – Full-Scope Review

CRA RATING FOR TEXAS: **SATISFACTORY**

The Lending Test is rated: **Low Satisfactory**

The Investment Test is rated: **High Satisfactory**

The Service Test is rated: **Low Satisfactory**

DESCRIPTION OF INSTITUTION’S OPERATIONS IN TEXAS

The Texas assessment area includes four whole counties: Collin, Dallas, Denton, and Tarrant. These four counties are contiguous and form part of the Dallas–Fort Worth–Arlington, TX MSA. More specifically, Tarrant County is part of the Fort Worth–Arlington–Grapevine, TX Metropolitan Division, and the other three counties are part of the Dallas–Plano–Irving, TX Metropolitan Division.

This assessment area is new since the previous evaluation. The bank opened an office in Denton County in February 2020. This is the bank’s only full-service office in this assessment area.

Economic and Demographic Data

The assessment area contains 1,507 census tracts across the four counties. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 149 low-income tracts
- 400 moderate-income tracts
- 426 middle-income tracts
- 508 upper-income tracts
- 24 tracts with no income designation

The following table details select demographic and economic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: Texas						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,507	9.9	26.5	28.3	33.7	1.6
Population by Geography	6,695,066	9.2	25.7	29.1	35.0	0.9
Housing Units by Geography	2,502,649	9.9	25.5	29.9	33.8	0.9
Owner-Occupied Units by Geography	1,337,186	4.6	20.1	31.1	43.8	0.4
Occupied Rental Units by Geography	985,332	16.0	32.1	28.9	21.5	1.5
Vacant Units by Geography	180,131	15.3	28.9	26.6	27.2	1.9
Businesses by Geography	1,057,954	4.8	17.6	30.0	46.7	0.9
Farms by Geography	16,171	3.5	16.9	31.7	47.2	0.7
Family Distribution by Income Level	1,582,026	22.3	17.3	19.0	41.4	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$88,315	Median Housing Value Median Gross Rent Families Below Poverty Level			\$251,543 \$1,234 8.4%
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$82,649				

Source: 2020 U.S. Census and 2022 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.

According to Moody’s Analytics, the Dallas metropolitan area has one of the strongest local economies in the country, with job growth twice the national average. Top performing industries include hospitality, finance, and healthcare. The assessment area continues to experience strong population growth, with the total population increasing by approximately 700,000, or 11.7 percent, based on a comparison of the 2020 U.S. Census data to the 2015 ACS data. This assessment area has the lowest median housing value among all seven assessment areas according to 2020 U.S. Census data, at approximately \$252,000. However, Moody’s Analytics notes that housing prices increased sharply in 2021, which negatively affects opportunities to lend to low- and moderate-income borrowers.

Unemployment rates in the assessment area declined throughout most of the evaluation period following initial spikes at the beginning of the COVID-19 pandemic. According to Bureau of Labor Statistics data, in May 2020, unemployment exceeded 10.0 percent in all four assessment area counties. In comparison, according to data from February 2023, unemployment was approximately 4.0 percent in the assessment area. Unemployment was highest in Dallas County, at 4.3 percent, and lowest in Denton County, at 3.8 percent. All four counties were below the Texas statewide unemployment rate of 4.5 percent for this same timeframe. According to Moody’s Analytics, major employers in the assessment area include Walmart Inc., American Airlines, Lockheed Martin, and Baylor Scott & White Health.

The following table presents the FFIEC-updated median family income levels in the Texas assessment area for 2021 and 2022.

Median Family Income Ranges				
Assessment Area: Texas				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Dallas-Plano-Irving, TX Metropolitan Division Median Family Income (19124)				
2021 (\$89,000)	<\$44,500	\$44,500 to <\$71,200	\$71,200 to <\$106,800	≥\$106,800
2022 (\$97,400)	<\$48,700	\$48,700 to <\$77,920	\$77,920 to <\$116,880	≥\$116,880
Fort Worth-Arlington-Grapevine, TX Metropolitan Division Median Family Income (23104)				
2021 (\$80,500)	<\$40,250	\$40,250 to <\$64,400	\$64,400 to <\$96,600	≥\$96,600
2022 (\$92,400)	<\$46,200	\$46,200 to <\$73,920	\$73,920 to <\$110,880	≥\$110,880
<i>Source: FFIEC</i>				

Competition

The assessment area is a highly competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2022, 157 financial institutions operated 1,393 offices in the assessment area. Of these, Woori ranked 130th with a deposit market share of less than 0.1 percent.

Significant competition also exists for home mortgage and small business loans in the assessment area. In 2021, 1,021 lenders reported 324,833 1-4 family HMDA loans originated or purchased. Additionally, 344 lenders reported 214,407 small business loans originated or purchased in 2021. Woori had market shares of less than 0.1 percent by number of loans for both products.

Community Contacts

Examiners reviewed three recent contacts with community development-related organizations in the assessment area. The contacts identified numerous opportunities to support community development and serve low- and moderate-income individuals throughout the Dallas metropolitan area. Affordable housing is a significant need, especially as the Dallas area population continues to grow and housing prices increase. Contacts identified financial literacy, homeownership counseling, and down payment assistance as other specific needs. One contact also noted the continued need for brick-and-mortar bank branches and in-person banking services, particularly in low- and moderate-income communities.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, as well as demographic and economic data, examiners determined that affordable housing and small business financing are primary needs in the assessment area. Specific needs include financial literacy training, homeownership counseling, and down payment assistance. Opportunities for revitalization and stabilization are present throughout the assessment area, particularly in southern Dallas County, which has a large concentration of low- and moderate-income tracts. These lower-income areas also continue to need basic retail banking services, including brick-and-mortar branch locations.

SCOPE OF EVALUATION – TEXAS

Examiners used full-scope examination procedures to evaluate Woori's performance in the Texas assessment area. All products, weighting, and timeframes described in the overall Scope of Evaluation section are applicable to this assessment area analysis.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TEXAS

LENDING TEST

The Lending Test rating is Low Satisfactory for the Texas assessment area. The bank's performance under the Lending Activity, Geographic Distribution, and Borrower Profile criteria primarily supports this rating. The following sections discuss the bank's performance under each of the Lending Test factors.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. Examiners considered the bank's new and limited presence in this assessment area when evaluating performance under this criterion.

During 2021 and 2022, Woori reported 32 1-4 family home mortgage loans totaling \$10.3 million in this assessment area. According to 2021 aggregate HMDA data, the bank ranked 809th by number of loans among the 1,021 HMDA reporters in the assessment area and had a market share of less than 0.01 percent. The top three 1-4 family home mortgage lenders in the assessment area in 2021, by number of loans, were Rocket Mortgage, JPMorgan Chase Bank, N.A., and Wells Fargo Bank, N.A., with a combined market share of 15.1 percent. Woori's home mortgage lending in this assessment area increased significantly during the review period, as the bank reported 31 loans in 2022 compared to just 1 loan in 2021.

During 2021 and 2022, Woori originated 101 small business loans totaling \$7.3 million in this assessment area. The bank's PPP lending in 2021 supported adequate performance under this criterion, with a large portion of its small business lending that year consisting of PPP loans. According to the 2021 aggregate small business loan data, the bank ranked 94th by number of loans among the 344 institutions that reported small business loans in the assessment area. Woori's small business lending volume in 2022 declined significantly with the expiration of the PPP in 2021, with just five small business loans reported in 2022.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. Although small business lending performance was poor, the bank's adequate performance for the more heavily weighted 1-4 family lending primarily supports the overall conclusion.

1-4 Family Home Mortgage Loans

The geographic distribution of 1-4 family loans reflects adequate penetration throughout the assessment area. The bank did not originate any loans in the low- or moderate-income tracts in 2021. However, examiners considered the bank’s relatively new presence in this assessment area when evaluating these low lending levels. Performance increased significantly in 2022. Lending in the low-income tracts in 2022 was more than double the demographic data, and lending in the moderate-income tracts was several percentage points below demographic data. Considering this positive trend, the bank’s overall performance under this criterion is adequate.

The following table displays the distribution of 1-4 family loans by tract income level.

Geographic Distribution of 1-4 Family Home Mortgage Loans Assessment Area: Texas						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	5.5	2.9	0	0.0	0	0.0
2022	4.6	--	3	9.7	627	6.5
Moderate						
2021	20.2	12.1	0	0.0	0	0.0
2022	20.1	--	5	16.1	1,076	11.1
Middle						
2021	28.7	29.1	0	0.0	0	0.0
2022	31.1	--	8	25.8	1,985	20.5
Upper						
2021	45.5	55.7	1	100.0	620	100.0
2022	43.8	--	15	48.4	5,980	61.9
Not Available						
2021	0.1	0.2	0	0.0	0	0.0
2022	0.4	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	1	100.0	620	100.0
2022	100.0	--	31	100.0	9,668	100.0

*Source: 2015 ACS, 2020 U.S. Census, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Small Business Loans

The geographic distribution of small business loans reflects poor penetration throughout the assessment area. In 2021, the bank’s performance exceeded aggregate and demographic data in the moderate-income tracts, but performance lagged the comparison data in low-income tracts. With no

PPP lending in 2022, overall lending volume declined significantly to just five loans. One of these loans was in a low-income tract, and no loans were in moderate-income tracts.

The following table displays the distribution of small business loans by tract income level.

Geographic Distribution of Small Business Loans							
Assessment Area: Texas							
Tract Income Level		% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2021	7.1	7.4	1	1.0	8	0.2
	2022	4.8	--	1	20.0	300	10.0
Moderate							
	2021	18.3	19.3	27	28.1	1,764	41.2
	2022	17.6	--	0	0.0	0	0.0
Middle							
	2021	25.6	24.5	27	28.1	1,383	32.3
	2022	30.0	--	1	20.0	762	25.5
Upper							
	2021	48.3	48.2	38	39.6	1,093	25.5
	2022	46.7	--	3	60.0	1,927	64.5
Not Available							
	2021	0.7	0.7	3	3.1	32	0.7
	2022	0.9	--	0	0.0	0	0.0
Totals							
	2021	100.0	100.0	96	100.0	4,280	100.0
	2022	100.0	--	5	100.0	2,989	100.0

*Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Borrower Profile

The distribution of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different sizes. Although small business performance was good, adequate performance for the more heavily weighted 1-4 family lending supports the overall conclusion.

1-4 Family Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels. The bank did not originate any loans to low- or moderate-income borrowers in 2021. However, examiners considered the bank’s relatively new presence in this assessment area when evaluating these lending levels. Lending to both low- and moderate-income borrowers

increased significantly in 2022. Notably, lending to moderate-income borrowers was more than double the percentage of moderate-income families in that year.

The following table displays the distribution of loans by borrower income level.

Distribution of 1-4 Family Home Mortgage Loans by Borrower Income Level						
Assessment Area: Texas						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	23.8	3.3	0	0.0	0	0.0
2022	22.3	--	4	12.9	625	6.5
Moderate						
2021	16.4	12.5	0	0.0	0	0.0
2022	17.3	--	11	35.5	2,310	23.9
Middle						
2021	17.9	18.2	0	0.0	0	0.0
2022	19.0	--	1	3.2	216	2.2
Upper						
2021	42.0	44.4	1	100.0	620	100.0
2022	41.4	--	15	48.4	6,517	67.4
Not Available						
2021	0.0	21.6	0	0.0	0	0.0
2022	0.0	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	1	100.0	620	100.0
2022	100.0	--	31	100.0	9,668	100.0

*Source: 2015 ACS, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Small Business Loans

The distribution of borrowers reflects good penetration among business customers of different sizes. The bank’s lending to businesses with revenues of \$1 million or less was more than double the aggregate level in 2021. Although overall lending volume declined sharply in 2022 following the expiration of PPP, the bank’s percentage of lending to businesses with revenues of \$1 million or less remained high at 80.0 percent.

The following table displays the distribution of small business loans by revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Texas						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤\$1,000,000						
2021	88.4	43.0	84	87.5	1,291	30.2
2022	91.8	--	4	80.0	2,167	72.5
>\$1,000,000						
2021	3.6	--	6	6.3	387	9.0
2022	2.4	--	0	0.0	0	0.0
Revenue Not Available						
2021	8.0	--	6	6.3	2,602	60.8
2022	5.8	--	1	20.0	822	27.5
Totals						
2021	100.0	100.0	96	100.0	4,280	100.0
2022	100.0	--	5	100.0	2,989	100.0
<i>Source: 2021-2022 D&B Data, Bank Data, 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Community Development Loans

Woori made a relatively high level of community development loans in the assessment area. During the evaluation period, the bank originated three community development loans totaling \$10.3 million. This activity represented 10.4 percent of the bank’s total community development lending by dollar volume, which exceeds the proportion of total bank lending and deposits in this assessment area. Examiners also considered the bank’s new presence in this assessment area during the evaluation period when evaluating the volume of community development lending.

Community development lending in this assessment area supported affordable housing and the revitalization or stabilization of low- and moderate-income areas. For example, in 2022, the bank originated a \$7.8 million loan to finance the purchase of a multi-tenant commercial center. This loan promoted stabilization by supporting business retention in a moderate-income tract. The bank also originated two loans secured by multifamily properties in which most units have below-market rents.

The following table details the bank’s community development lending in the Texas assessment area by year and purpose.

Community Development Lending Assessment Area: Texas										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020 (partial)	1	510	0	0	0	0	0	0	1	510
2021	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	1	7,750	1	7,750
Year-to-date 2023	1	2,000	0	0	0	0	0	0	1	2,000
Total	2	2,510	0	0	0	0	1	7,750	3	10,260

Source: Bank Records

INVESTMENT TEST

The Investment Test rating is High Satisfactory for the Texas assessment area. The bank’s performance under the Investment and Grant Activity and Responsiveness to Credit and Community Development Needs criteria primarily supports this rating. The following sections discuss the bank’s performance under each of the Investment Test factors.

Investment and Grant Activity

Woori has a significant level of qualified community development investments and grants in the Texas assessment area. The bank made qualified investments totaling \$6.4 million, including four new investments totaling \$6.4 million and five grants for \$11,000. This activity accounts for 8.9 percent of the bank’s total qualified investments, which is a high volume considering the bank’s new presence in this assessment area.

As an example of the bank’s qualified investments in this assessment area, in 2022, the bank invested \$1 million in a municipal bond supporting the Dallas Independent School District. The bond proceeds funded the renovation of instructional and instructional-support facilities including technology upgrades, software upgrades, and heating and air conditioning system improvement. Over 80.0 percent of the students in the district come from low- or moderate-income families. Most of the remaining qualified investments in this area were in mortgage-backed securities, primarily secured by mortgages to low- and moderate-income borrowers within the assessment area.

Responsiveness to Credit and Community Development Needs

The bank’s qualified investments and donations exhibit good responsiveness to the credit and community development needs of the Texas assessment area. The bank’s qualified investments primarily supported affordable housing and community services for low- and moderate-income individuals, both of which are community development needs in the assessment area.

Community Development Initiatives

Woori rarely uses innovative or complex investments to support community development in the Texas assessment area. Most of the qualified investments in this area were mortgage-backed securities, which are frequently used by other financial institutions and are not particularly innovative or complex.

SERVICE TEST

The Service Test rating is Low Satisfactory for the Texas assessment area. Although Woori's performance under the Changes in Branch Locations and Reasonableness of Business Hours and Services criteria was good, its performance was lower under the Accessibility of Delivery Systems and Community Services criteria, which affected the overall rating. The following sections discuss the bank's performance under each of the Service Test factors.

Accessibility of Delivery Systems

Given Woori's single branch location and the large assessment area served by this office, delivery systems are accessible to limited portions of this assessment area. Conclusions regarding the branch distribution in this assessment area differed from the conclusions for the institution overall, as branch accessibility in this assessment area was generally more limited.

The bank's sole office in this assessment area is located in a middle-income tract in southeastern Denton County. Of note, this census tract is adjacent to two moderate-income tracts and less than one mile from a low-income tract, which provides access to services for residents and businesses in those areas. However, the office is not located in close proximity to the assessment area's largest concentrations of low- and moderate-income tracts, specifically those in southern Dallas County and central Tarrant County (Fort Worth).

Woori's alternative delivery systems in this assessment area are consistent with the institution overall. Refer to the Service Test section for the overall institution for a discussion of the alternative delivery systems and how they may benefit low- and moderate-income geographies or low- and moderate-income individuals.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank opened its sole office in this assessment area in February 2020. As noted previously, the office is located in close proximity to several low- or moderate-income tracts. The office opening supported the accessibility of banking services in those areas.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. Performance in this assessment area is consistent with the institution's overall performance. Business hours are 9:00 a.m. to 5:00 p.m. on Monday through Friday. The ATM in this assessment area is available seven days a week, both during and outside of normal business hours. Loan and deposit product offerings are consistent with the institution as a whole.

Community Development Services

Woori provided an adequate level of community development services within the Texas assessment area. During the evaluation period, bank employees engaged in 10 instances of community development services, all of which supported community services for low- and moderate-income individuals. For example, in 2021 and 2022, bank employees conducted events to educate low- and moderate-income individuals on financial literacy and budgeting at a nonprofit organization that primarily serves survivors of domestic violence.

GEORGIA – Full-Scope Review

CRA RATING FOR GEORGIA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN GEORGIA

The Georgia assessment area includes two whole counties: Fulton and Gwinnett. These two counties are contiguous and form part of the Atlanta–Sandy Springs–Alpharetta, GA MSA.

This assessment area is new since the previous evaluation. The bank opened an office in Gwinnett County in May 2022. This is the bank’s only full-service office in this assessment area.

Economic and Demographic Data

The assessment area contains 547 census tracts across the two counties. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 54 low-income tracts
- 115 moderate-income tracts
- 128 middle-income tracts
- 215 upper-income tracts
- 35 tracts with no income designation

The following table details select demographic and economic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: Georgia						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	547	9.9	21.0	23.4	39.3	6.4
Population by Geography	2,023,772	7.7	22.6	25.7	39.5	4.4
Housing Units by Geography	792,583	9.4	22.3	23.3	39.9	5.0
Owner-Occupied Units by Geography	425,090	3.9	17.3	27.2	48.8	2.8
Occupied Rental Units by Geography	301,972	15.2	28.7	19.8	28.7	7.6
Vacant Units by Geography	65,521	18.6	25.6	14.2	33.8	7.8
Businesses by Geography	525,023	6.0	20.9	22.0	45.7	5.4
Farms by Geography	5,914	5.3	23.9	27.7	39.8	3.2
Family Distribution by Income Level	454,871	21.8	15.9	18.2	44.2	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$84,791	Median Housing Value			\$292,770
			Median Gross Rent			\$1,278
			Families Below Poverty Level			9.0%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to Moody’s Analytics, the local economy in the Atlanta metropolitan area continues to grow at a healthy pace. The area benefits from a diverse local economy, with the financial, professional/business services, and healthcare industries fueling recent job growth. However, housing in the assessment area has become less affordable over the past several years, which negatively affects opportunities to lend to low- and moderate-income borrowers.

Unemployment rates in the assessment area declined throughout most of the evaluation period following initial spikes at the beginning of the COVID-19 pandemic. According to Bureau of Labor Statistics data, in the first half of 2020, unemployment exceeded 10.0 percent in both assessment area counties. In comparison, according to data from February 2023, unemployment was 2.9 percent in Gwinnett County and 3.5 percent in Fulton County. The Georgia statewide unemployment rate was 3.3 percent for this same timeframe. According to Moody’s Analytics, major employers in the assessment area include Delta Air Lines, Inc., Emory University & Emory Healthcare, and The Home Depot, Inc.

The following table presents the FFIEC-updated median family income levels in the Georgia assessment area for 2021 and 2022.

Median Family Income Ranges				
Assessment Area: Georgia				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Atlanta-Sandy Springs-Alpharetta, GA MSA Median Family Income (12060)				
2021 (\$85,700)	<\$42,850	\$42,850 to <\$68,560	\$68,560 to <\$102,840	≥\$102,840
2022 (\$95,700)	<\$47,850	\$47,850 to <\$76,560	\$76,560 to <\$114,840	≥\$114,840
<i>Source: FFIEC</i>				

Competition

The assessment area is a moderately competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2022, 60 financial institutions operated 417 offices in the assessment area. Of these, Woori ranked 52nd with a deposit market share of less than 0.1 percent.

Significant competition exists for home mortgage and small business loans in the assessment area. In 2021, 760 lenders reported 121,522 1-4 family HMDA loans originated or purchased. Additionally, 245 lenders reported 104,896 small business loans originated or purchased in 2021. By number of loans, Woori had a 1-4 family market share of less than 0.1 percent and a small business market share of 0.2 percent.

Community Contact

Examiners reviewed a recent contact with a community development-related organization in the assessment area. The contact noted the increasing cost of living, including higher rents and property taxes, as a major challenge facing assessment area residents. The contact identified several specific needs in the assessment area, including working capital for small businesses, affordable mortgage loans for homebuyers, and down payment assistance programs. The contact observed a trend of banks closing physical branches during the pandemic, but stated that demand for in-person banking still exists.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, as well as demographic and economic data, examiners determined that affordable housing and small business financing are primary needs in the assessment area. Specific housing needs include affordable home mortgage products and down payment assistance programs. Opportunities for revitalization and stabilization are present throughout the assessment area, particularly in western Gwinnett County and in portions of Fulton County directly south and west of downtown Atlanta, all of which have high concentrations of low- and moderate-income tracts.

SCOPE OF EVALUATION – GEORGIA

Examiners used full-scope examination procedures to evaluate Woori’s performance in the Georgia assessment area. Given that the bank opened its first full-service branch in this assessment area in May 2022, examiners only analyzed 1-4 family and small business lending data from 2022. All other products and weighting described in the overall Scope of Evaluation section are applicable to this assessment area analysis.

CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

LENDING TEST

The Lending Test rating is Low Satisfactory for the Georgia assessment area. The bank’s performance under the Lending Activity and Geographic Distribution criteria primarily supports this rating. The bank’s Borrower Profile performance was relatively stronger than in the aforementioned criteria, while its Community Development Lending performance was weaker. The following sections discuss the bank’s performance under each of the Lending Test factors.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. Examiners considered the bank’s new presence in this assessment area when evaluating performance under this criterion. Specifically, the bank’s full-service branch in this assessment area was open for slightly less than one year as of the date of this evaluation. Despite this new presence, the bank originated 15 1-4 family loans totaling \$5.9 million in 2022. The bank also originated two small business loans totaling \$850,000 in that year.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of 1-4 family loans primarily supports this conclusion.

1-4 Family Home Mortgage Loans

The geographic distribution of 1-4 family loans reflects adequate penetration throughout the assessment area. The bank did not originate any loans in the low-income tracts in 2022; however, this is reasonable considering the bank’s new presence in this assessment area. Lending in the moderate-income tracts was notably stronger, exceeding demographic data by 9.4 percentage points, and supports adequate performance under this criterion.

The following table displays the distribution of 1-4 family loans by tract income level.

Geographic Distribution of 1-4 Family Home Mortgage Loans Assessment Area: Georgia						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	3.9	--	0	0.0	0	0.0
Moderate						
2022	17.3	--	4	26.7	886	15.1
Middle						
2022	27.2	--	6	40.0	2,669	45.6
Upper						
2022	48.8	--	3	20.0	933	15.9
Not Available						
2022	2.8	--	2	13.3	1,372	23.4
Totals						
2022	100.0	--	15	100.0	5,859	100.0

*Source: 2020 U.S. Census, Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Small Business Loans

The number of small business loans originated by the bank in this assessment area was too low to analyze and draw meaningful conclusions. Woori originated two small business loans in this assessment area, including one loan in a low-income tract. Although the loan volume was low, examiners considered the bank's limited time and presence in this assessment area during the evaluation period.

Borrower Profile

The distribution of borrowers reflects good penetration among retail customers of different income levels and business customers of different sizes. The bank's good performance for the more heavily weighted 1-4 family lending primarily supports the overall conclusion.

1-4 Family Home Mortgage Loans

The distribution of borrowers reflects good penetration among retail customers of different income levels. Although lending to low-income borrowers trailed the demographic data in 2022, this is reasonable considering that 9.0 percent of assessment area families have incomes below the poverty line and therefore are unlikely to qualify for a home mortgage loan. Lending to moderate-income borrowers was much stronger, exceeding demographic data by 10.8 percentage points.

The following table displays the distribution of loans by borrower income level.

Distribution of 1-4 Family Home Mortgage Loans by Borrower Income Level						
Assessment Area: Georgia						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	21.8	--	1	6.7	67	1.1
Moderate						
2022	15.9	--	4	26.7	814	13.9
Middle						
2022	18.2	--	3	20.0	808	13.8
Upper						
2022	44.2	--	7	46.7	4,170	71.2
Not Available						
2022	0.0	--	0	0.0	0	0.0
Totals						
2022	100.0	--	15	100.0	5,859	100.0
<i>Source: 2020 U.S. Census, Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The number of small business loans originated by the bank in this assessment area was too low to analyze and draw meaningful conclusions. Woori originated two small business loans, including one loan to a business with revenues of \$1 million or less. Although the loan volume was low, examiners considered the bank’s limited time and presence in this assessment area during the evaluation period.

Community Development Loans

Woori made no community development loans in the Georgia assessment area during the evaluation period.

INVESTMENT TEST

The Investment Test rating is High Satisfactory for the Georgia assessment area. The bank’s performance under the Investment and Grant Activity and Responsiveness to Credit and Community Development Needs criteria primarily supports this rating. The following sections discuss the bank’s performance under each of the Investment Test factors.

Investment and Grant Activity

Woori has a significant level of qualified community development investments in the Georgia assessment area. The bank had three qualified investments totaling \$4 million in this assessment

area. This activity accounts for 5.5 percent of the bank's total qualified investments, which is a high volume considering the limited time during which the bank has operated a full-service office in this assessment area.

All three of the bank's qualified investments in this area were mortgage-backed securities, primarily secured by mortgages to low- and moderate-income borrowers within the assessment area.

Responsiveness to Credit and Community Development Needs

The bank's qualified investments and donations exhibit good responsiveness to the credit and community development needs of the Georgia assessment area. The bank's qualified investments all supported affordable housing, which is a community development need in the area.

Community Development Initiatives

Woori rarely uses innovative or complex investments to support community development in the Georgia assessment area. All qualified investments in this area were mortgage-backed securities, which are frequently used by other financial institutions and are not particularly innovative or complex.

SERVICE TEST

The Service Test rating is High Satisfactory for the Georgia assessment area. The bank's performance under the Changes in Branch Locations and Reasonableness of Business Hours and Services criteria primarily supports this rating. The following sections discuss the bank's performance under each of the Service Test factors.

Accessibility of Delivery Systems

Given Woori's single branch location and the large assessment area served by this office, delivery systems are accessible to limited portions of this assessment area. Conclusions regarding the branch distribution in this assessment area differed from the conclusions for the institution overall, as branch accessibility in this assessment area was generally more limited.

Although Woori maintains just one branch office in this assessment area, it is located in a moderate-income tract in Gwinnett County. Additionally, this tract is located within a broader cluster of approximately 50 low- or moderate-income tracts in the western portion of the county; consequently, the branch also provides access to services for residents and businesses in some of those areas.

Woori's alternative delivery systems in this assessment area are consistent with the institution overall. Refer to the Service Test section for the overall institution for a discussion of the alternative delivery systems and how they may benefit low- and moderate-income geographies or low- and moderate-income individuals.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank opened its sole office in this assessment area in May 2022. As noted previously, this office is located in a moderate-income census geography within a large concentration of low- and moderate-income tracts in western Gwinnett County. As such, opening this office improved the accessibility of banking services in this predominantly low- and moderate-income area.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. Performance in this assessment area is consistent with the institution's overall performance. Business hours are 9:00 a.m. to 4:30 p.m. on Monday through Friday. The ATM in this assessment area is available seven days a week, both during and outside of normal business hours. Loan and deposit product offerings are consistent with the institution as a whole.

Community Development Services

Woori provided an adequate level of community development services within the Georgia assessment area, particularly given the limited time during which the bank has operated an office in this assessment area. During the review period, the bank provided two community development services. Specifically, in 2022, two bank employees conducted a seminar on elder financial abuse prevention at an adult care center located in a low-income census tract.

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
 - i. The proportion of the bank's lending in the bank's assessment area(s);
 - ii. The dispersion of lending in the bank's assessment areas(s); and
 - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
 - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
 - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
 - iii. Small business and small farm loans by loan amount at origination; and
 - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

SCOPE OF EVALUATION

Woori America Bank	
Scope of Examination: Full-scope reviews were performed on the following assessment areas within the noted rated areas: New York–New Jersey multistate: New York–Newark–Jersey City, NY-NJ-PA MSA California: Los Angeles–Long Beach–Anaheim, CA MSA Virginia: Washington–Arlington –Alexandria, DC-VA-MD-WV MSA Pennsylvania: Philadelphia–Camden–Wilmington, PA-NJ-DE-MD MSA Maryland: Washington–Baltimore–Arlington, DC-MD-VA-WV-PA CSA Texas: Dallas–Fort Worth–Arlington, TX MSA Georgia: Atlanta–Sandy Springs–Alpharetta, GA MSA	
Time Period Reviewed:	01/16/2020-05/09/2023
Products Reviewed: 1-4 Family Home Mortgage Loans: 2020, 2021, and 2022 Small Business Loans: 2020, 2021, 2022 Multifamily Home Mortgage Loans: 2020, 2021, and 2022 Community Development Loans, Investments, and Services: 01/16/2020-05/09/2023	

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
New York–New Jersey	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
California	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Virginia	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Pennsylvania	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Maryland	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Texas	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Georgia	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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 metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.