



PUBLIC DISCLOSURE

November 24, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Dryden
Charter Number 6487

7 West Main Street
Dryden, NY 13053

Office of the Comptroller of the Currency

Syracuse Office
5000 Brittonfield Parkway, Suite A132
East Syracuse, NY 13057

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on The First National Bank of Dryden's (FNBD or bank) performance in the assessment areas (AA) in state of New York, which demonstrated an overall poor distribution of loans to geographies of different income levels and an overall excellent distribution of loans to borrowers of different income levels.
- FNBD's average loan-to-deposit ratio (LTD) was less than reasonable based on the bank's size, financial condition, and credit needs of the AA.
- A substantial majority of home mortgage loans and consumer loans originated during the evaluation period were within the bank's AAs.
- The bank had no consumer complaints regarding its Community Reinvestment Act (CRA) performance during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was less than reasonable. FNBD's average LTD ratio for the prior 16 quarters, following the date of the prior evaluation period, January 1, 2021, through the end of the current evaluation period, December 31, 2024, was 34.9 percent. In comparison, the quarterly average LTD of four similarly situated banks in the surrounding areas was 71.7 percent during the same period, with ratios ranging from a low of 51.3 percent to a high of 91.9 percent.

Lending in Assessment Area

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

The bank originated and purchased 83.8 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. FNBD did not submit affiliate lending data for consideration.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	196	83.8	38	16.2	234	32,404	82.6	6,810	17.4	39,214
Consumer	134	83.8	26	16.3	160	3,569	82.5	758	17.5	4,327
Total	330	83.8	64	16.2	394	35,973	82.6	7,568	17.4	43,541

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

FNBD is a full-service intrastate community bank headquartered in Dryden, New York. As of December 31, 2024, FNBD had total assets of \$206.2 million. The bank's business strategy focused on originating consumer installment loans and one- to four-family residential mortgage loans.

As of December 31, 2024, FNBD reported \$186.9 million in total deposits and \$25.1 million in tier 1 capital. The bank's assets consisted of \$92.1 million in total loans and \$83.4 million in investments. The loan portfolio comprised 55.9 percent of one- to four-family residential real estate loans, 19.8 percent of loans to individuals, and 12.2 percent of commercial and industrial loans.

FNBD operates within two AAs within the state of New York: Ithaca, NY Metropolitan Statistical Area (MSA) AA (MSA #27060) (referred as the Ithaca NY MSA AA) and a non-MSA (referred as the NY Non MSA AA). The Ithaca NY MSA AA includes portions of Tompkins County. The NY Non MSA AA includes portions of Cortland County and two census tracts from Tioga County that are part of the Binghamton, NY MSA (MSA #13780) but are adjacent to Tompkins County. FNBD operated four branches across its AA. All branch locations were equipped with drive-up facilities and non-deposit-taking automated teller machines (ATMs). The bank offered a traditional selection of banking products and services, including online banking and bill pay. There were no branch openings or closures during the evaluation period.

There were no legal, financial, or other factors identified that would impede the bank's ability to help meet the credit needs within its assessment areas. FNBD's prior CRA evaluation dated September 20, 2021, resulted in a "Satisfactory" rating based on a "Satisfactory" Lending Test rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's performance in its AAs under the CRA. The OCC evaluated the bank's performance under the Small Bank CRA procedures, which includes the Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its primary lending products, home mortgage and consumer loans. During the evaluation period, home mortgage loans were 8 percent of total number of loans originated and 45.8 percent loans originated by total dollar originated. Consumer loans were 81.6 percent of total number of loans originated and 36.7 percent loans originated by total dollar originated. The evaluation period was January 1, 2022, to December 31, 2024. The OCC assessed 2022, 2023, and 2024 lending activities against the 2020 U.S. Census data.

Consumer loan data is not reported. Therefore, the OCC determined the bank's performance under the Lending Test using a random loan sample of 160 consumer loans and considered the results in context as they do not represent the bank's total originations and purchases during the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are

combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is based on the rating for the state of New York. The state rating is based on the weighted-average conclusions in the AAs. Refer to the “Scope” section under the state Rating section for details regarding how the areas were weighted in arriving at the respective rating.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- An overall poor distribution of loans to geographies of different income levels.
- An overall excellent distribution of loans to borrowers of different income levels.
- FNBD did not receive any CRA related complaints during the evaluation period

Description of Institution's Operations in New York

As of December 31, 2024, FNBD had two AAs within the state of New York, the Ithaca NY MSA AA and the NY Non MSA AA. The AAs met the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income tracts. FNBD operated four branches throughout its AAs. The bank offered a full range of loan and deposit products and services through three of the four branches. The North Street Office branch does not provide lending services. All branches had non-deposit taking ATMs in the state of New York.

FNBD's home mortgage originations in the Ithaca NY MSA AA accounted for 23.5 percent of total mortgage loans and 44.8 percent of total consumer loan originations in the AAs during the evaluation period. FNBD's home mortgage originations in NY Non MSA AA accounted for 76.5 percent of total mortgage loans and 55.2 percent of total consumer loans in the AAs during the evaluation period.

Ithaca NY MSA AA

Assessment Area – Ithaca NY MSA AA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.00	0.00	100.00	0.00	0.00
Population by Geography	28,293	0.00	0.00	100.00	0.00	0.00
Housing Units by Geography	12,767	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	8,571	0.00	0.00	100.00	0.00	0.00
Occupied Rental Units by Geography	3,457	0.00	0.00	100.00	0.00	0.00
Vacant Units by Geography	739	0.00	0.00	100.00	0.00	0.00
Businesses by Geography	727	0.00	0.00	100.00	0.00	0.00
Farms by Geography	90	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	7,854	22.92	17.37	21.66	38.06	0.00
Household Distribution by Income Level	12,028	18.47	12.98	20.34	48.21	0.00
Unemployment rate (%)	3.95	0.00	0.00	3.95	0.00	0.00
Households Below Poverty Level (%)	9.82	0.00	0.00	9.82	0.00	0.00
Median Family Income (27060 - Ithaca, NY MSA)		\$87,977		Median Housing Value		\$205,300
Median Family Income (27060 - Ithaca, NY MSA) for 2024		\$110,200		Median Gross Rent		\$989
				Families Below Poverty Level		6.74
FFIEC File - 2020 Census; FFIEC File – 2024 Census; 2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

The Ithaca NY MSA AA consisted of seven contiguous census tracts located in the eastern portion of Tompkins County. Per 2020 U.S. Census data, all census tracts in the AA were middle-income. According to the Federal Financial Institutions Examination Council (FFIEC)'s list of distressed and underserved tracts, there were no census tracts designated as distressed or underserved in the AA. FNBD operated two full-service branches in the AA.

According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) market share data, FNBD held \$115.4 million in deposits in the Ithaca NY MSA AA, representing 57 percent of total bank deposits. FNBD ranked fifth out of 11 deposit-taking institutions in the market, with a 4.4 percent market share. The local deposit market was highly concentrated, dominated by Tompkins Community Bank with 61.3 percent of deposits, followed by M&T Bank with 9.2 percent, and Chemung Canal Trust Company with 5.3 percent.

Economic Data

Economic conditions in the AA remained relatively stable during the evaluation period. The unemployment rate in the AA was 4 percent. The unemployment rate in the AA remained slightly below the state unemployment rate of 4.4 percent. During the evaluation period, the unemployment rate ranged from a low of 2.3 percent in April 2023 to a high of 3.8 percent in June and July 2024. The AA contained 727 businesses, reflecting a modest but diverse local commercial base consistent with a small metropolitan area anchored by higher education and health care industries. Major employers include Cornell University, Cayuga Health System, Ithaca College, and Ithaca City School District.

Community Contact

The OCC utilized one community contact with a local organization that provides affordable housing in the area. The organization reported strong demand for affordable housing among low- and moderate-income individuals and families. The lack of affordable rental and owner-occupied housing options was identified as a significant impediment to meeting local credit needs and was cited as a challenge for low- and moderate-income households seeking financing.

NY Non MSA AA

Assessment Area - NY Non-MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.00	21.43	42.86	35.71	0.00
Population by Geography	49,554	0.00	21.74	41.02	37.24	0.00
Housing Units by Geography	22,059	0.00	25.83	42.00	32.17	0.00
Owner-Occupied Housing by Geography	12,991	0.00	13.80	48.93	37.27	0.00
Occupied Rental Units by Geography	6,136	0.00	50.31	27.05	22.64	0.00
Vacant Units by Geography	2,932	0.00	27.90	42.56	29.54	0.00
Businesses by Geography	1,445	0.00	28.72	37.09	34.19	0.00
Farms by Geography	107	0.00	4.67	67.29	28.04	0.00
Family Distribution by Income Level	12,503	17.00	18.43	22.83	41.73	0.00
Household Distribution by Income Level	19,127	19.91	16.34	18.01	45.74	0.00
Unemployment rate (%)	5.61	0.00	6.76	5.31	5.12	0.00
Households Below Poverty Level (%)	13.74	0.00	23.65	9.28	11.73	0.00
Median Family Income (13780 - Binghamton, NY MSA)		\$71,132		Median Housing Value		\$126,200
Median Family Income (Non-MSAs - NY)		\$68,606		Median Gross Rent		\$787
Median Family Income (13780 - Binghamton, NY MSA) for 2024		\$88,700		Families Below Poverty Level		7.51
Median Family Income (Non-MSAs - NY) for 2024		\$83,800				
FFIEC File - 2020 Census; FFIEC File - 2024 Census; 2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Per the 2024 U.S. Census data, the NY Non MSA AA consisted of 14 census tracts, of which three were moderate-income, six were middle-income, and five were upper-income. There were no low-income census tracts. The AA consisted of all but one census tract in Cortland County. The excluded Cortland County census tract is a middle-income geography located in the far northeastern portion of the county and is not near any of the bank's branches. In addition, the AA included two census tracts in Tioga County, which are part of the Binghamton, NY MSA. As the bank does not operate any branches in the Binghamton, NY MSA, the MSA does not require separate CRA evaluation, and the OCC included these tracts in the NY Non MSA AA because their demographic characteristics are more consistent with those of the NY Non MSA counties. Adjacent to both the Ithaca NY MSA AA and the NY Non MSA AA, the two Tioga County tracts were geographically reasonable based on their proximity to the bank's main office, and there is a limited presence of other financial institutions serving those tracts. As both tracts are middle- and upper-income geographies, their inclusion does not affect the distribution of low- or moderate-income tracts in the AA and does not impact the bank's geographic distribution performance evaluation.

FNBD operated two branches in the AA. According to the June 30, 2024, FDIC market share data, FNBD held \$87.1 million in deposits in the AA, representing 43 percent of total bank deposits. FNBD ranked third out of six deposit-taking institutions in the market, with a 10 percent market share. The

deposit market was highly concentrated, led by NBT Bank, N.A. with 42.5 percent of deposits and KeyBank, N.A. with 31.1 percent. Tompkins Community Bank had 9.5 percent of deposits.

Economic Data

Economic conditions in the AA remained relatively stable during the evaluation period. The unemployment rate in the AA was 5.6 percent. The unemployment rate in the AA remained slightly above the state unemployment rate of 4.4 percent. During the evaluation period, the unemployment rate ranged from a low of 2.9 percent in September and October 2022 to a high of 5.8 percent in January 2024. The AA contained 1,445 businesses, anchored by higher education, health care industries, and municipality. Major employers include State University of New York at Cortland, Guthrie Cortland Medical Center, Cortland County Government, and Cortland School District.

Community Contact

The OCC utilized one community contact in Cortland County who identified several significant needs affecting low- and moderate-income households in the AA. The contact emphasized that safe, affordable housing is a major concern, exacerbated by rising housing and repair costs since the COVID-19 pandemic. The contact also noted strong demand for financial assistance related to heating, utilities, food, and basic necessities. In addition, the contact noted inadequate childcare availability and pediatric and dental healthcare access, with many children not receiving necessary or preventive care.

Scope of Evaluation in New York

The OCC conducted a full-scope review of the bank's two AA in the state of New York. Consumer lending received a heavier weighting over home mortgage lending in the performance assessment given its proportion of originations during the evaluation period. As there were no low- or moderate-income geographies in the Ithaca NY MSA AA, the OCC only considered the performance in the NY Non MSA AA when evaluating the distribution of loans in geographies of different income levels. The NY Non MSA AA received a heavier weighting in the performance assessment of the distribution of loans to borrowers of different income levels given its proportion of originations during the evaluation period.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Ithaca NY MSA AA and NY Non MSA AA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in the State.

Home Mortgage Loans

Refer to Table 7 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

NY Non MSA AA

The geographic distribution of home mortgage loans is poor. During the evaluation period, the geographic distribution of home mortgage loans was below the percentage of households in moderate-income geographies and well below the aggregate lending in moderate-income geographies. There are no low-income geographies in the AA. As noted by the community contact, rising home prices and repair costs since the COVID-19 pandemic as well as household budget pressures have strained affordability even if housing prices are considered affordable.

Consumer Loans

Refer to Table 13 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

NY Non MSA AA

The geographic distribution of consumer loans is poor. During the evaluation period, the geographic distribution of consumer loans was significantly below the percentage of households in moderate-income geographies. There are no low-income geographies in the AA. As noted by the community contact, there is a significant need in the AA for financial assistance to meet basic necessities such as heating, utilities, and food. Increasing prices in basic necessities has strained budgets and credit opportunities in moderate-income geographies.

Lending Gap Analysis

The OCC reviewed supervisory data and other summary reports and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 8 in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Ithaca NY MSA AA

The distribution of loans to individuals of different income levels is reasonable. During the evaluation period, the distribution of home mortgage loans to low-income borrowers was well below the percentage of low-income families and approximated aggregate lending in the AA. The distribution of home mortgage loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and aggregate lending in the AA.

NY Non MSA AA

The distribution of loans to individuals of different income levels is reasonable. During the evaluation period, the distribution home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and approximated aggregate lending in the AA. The distribution home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate lending in the AA.

Low-income penetration in both AAs was low due to affordability constraints stemming from increasing housing prices as well as high home repair costs that limit the ability of low-income families to qualify for mortgage credit while having a lesser impact on moderate-income borrowers.

Consumer Loans

Refer to Table 14 in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Ithaca NY MSA AA

The distribution of loans to individuals of different income levels is excellent. During the evaluation period, the distribution of consumer loans to low- and moderate-income borrowers significantly exceeded the percentage of low- and moderate-income families in the AA.

NY Non MSA AA

The distribution of loans to individuals of different income levels is excellent. During the evaluation period, the distribution of consumer loans to low-income borrowers approximated the percentage of low-income families in the AA. The distribution of consumer loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA.

Responses to Complaints

FNBD did not receive any CRA related complaints during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage and consumer loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
Ithaca NY MSA AA	Full-Scope	Portions of Tompkins County
NY Non MSA AA	Full-Scope	Portions of Cortland and Tioga counties

Appendix B: Summary State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
First National Bank of Dryden	Satisfactory
State:	
New York	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Low-Income: Individual income that is at 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.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a Core Based Statistical Area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022 - 2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Ithaca NY MSA	46	6,396	23.5	1,428	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
NY Non MSA	150	26,008	76.5	2,436	0.0	0.0	0.0	13.8	10.7	19.3	48.9	79.3	46.3	37.3	10.0	34.4	0.0	0.0	0.0
Total	196	32,404	100.0	3,864	0.0	0.0	0.0	8.3	8.2	12.1	69.2	84.2	66.2	22.5	7.6	21.7	0.0	0.0	0.0

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022 - 2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Ithaca NY MSA	46	6,396	23.5	1,428	22.9	10.9	12.3	17.4	39.1	25.5	21.7	28.3	24.2	38.1	10.9	31.1	0.0	10.9	6.9
NY Non MSA	150	26,008	76.5	2,436	17.0	6.7	7.1	18.4	21.3	21.1	22.8	28.7	25.8	41.7	34.7	33.3	0.0	8.7	12.7
Total	196	32,404	100.0	3,864	19.3	7.6	9.1	18.0	25.5	22.7	22.4	28.6	25.2	40.3	29.1	32.5	0.0	9.2	10.6

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2022 - 2024

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Ithaca NY MSA	60	1,600	44.8	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
NY Non MSA	74	1,969	55.2	0.0	0.0	25.5	10.8	41.9	70.3	32.6	18.9	0.0	0.0
Total	134	3,569	100.0	0.0	0.0	15.7	6.0	64.3	83.6	20.0	10.4	0.0	0.0

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2022 - 2024

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Ithaca NY MSA	60	1,600	44.8	18.5	23.3	13.0	28.3	20.3	28.3	48.2	20.0	0.0	0.0
NY Non MSA	74	1,969	55.2	19.9	16.2	16.3	32.4	18.0	27.0	45.7	18.9	0.0	5.4
Total	134	3,569	100.0	19.4	19.4	15.0	30.6	18.9	27.6	46.7	19.4	0.0	3.0

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.

Due to rounding, totals may not equal 100.0%