



PUBLIC DISCLOSURE

October 14, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Bank of Greene County
Charter Number: 718028

302 Main Street
Catskill, NY 12414

Office of the Comptroller of the Currency

91 Fieldcrest Avenue, Suite A-30
Edison, NJ 08837

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 following table indicates the performance level of The Bank of Greene County (TBOGC or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Bank of Greene County Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	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 major factors that support this rating include:

- The Lending Test rating is based on performance in the state of New York (NY). Lending levels reflect excellent responsiveness to the assessment area (AA) credit needs. Community development (CD) loans had a neutral impact on the Lending Test conclusion.
- The Investment Test rating is based on an adequate level of CD investments.
- The Service Test rating is based on the bank’s retail services being reasonably accessible to geographies and individuals of different income levels and an excellent level of CD services.

Lending in Assessment Area

A substantial majority of the bank’s loans were in its AAs.

The bank originated and purchased 90.7 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. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	844	90.5	89	9.5	933	227,883	79.7	57,947	20.3	285,830
Small Business	1,125	91.0	111	9.0	1,236	142,877	84.2	26,904	15.9	169,781
Total	1,969	90.7	200	9.3	2,169	370,760	81.3	84,851	18.7	455,611

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

Description of Institution

The Bank of Greene County is a single state institution headquartered in Catskill, New York. Originally established in 1889, the bank operates as a wholly owned subsidiary of Greene County Bancorp, Inc. (GCB), which is also based in Catskill, NY. GCB's assets are primarily composed of its investment in TBOGC. TBOGC maintains two limited-purpose subsidiaries, Greene County Commercial Bank and Greene Property Holdings, Ltd. Affiliate activities were not considered in evaluating the bank's performance.

TBOGC is a community bank providing a comprehensive suite of loan and deposit products, along with other financial services. The core operations involve gathering retail deposits from individuals and businesses in the communities surrounding branch locations. These funds, along with revenue from operations and borrowings, are primarily allocated toward residential mortgage loans, commercial real estate loans, consumer lending, home equity loans, and commercial business loans. Additionally, the bank holds a significant portion of assets in mortgage-backed securities and securities issued by state and local government entities.

As of December 31, 2024, TBOGC had total assets of \$3 billion, total deposits of \$2.5 billion, and tier 1 capital totaling \$268.4 million. The loan portfolio totaled \$1.5 billion, of which 93.7 percent were real estate loans and the remaining 6.3 percent were commercial, industrial, and other consumer loans. Of the real estate loans, 34 percent were 1-4 family residential, 40.6 percent were non-farm non-residential commercial real estate, 18.5 percent were multifamily, and 6.8 percent were construction.

The bank's principal business is lending, with a focus on commercial real estate, multifamily loans, and single-family, owner-occupied residential mortgage loans. TBOGC offers a variety of standard community bank deposit and lending products and services. These include checking, savings, and money market deposit accounts, certificates of deposit, fixed and adjustable-rate mortgages, home equity loans, consumer loans (secured and unsecured), commercial loans, and business checking and savings accounts.

The bank has three AAs within the state of NY, consisting of the NY Non-MSA AA, the Albany-Schenectady-Troy MSA AA, and the Kingston MSA AA. TBOGC operates 18 retail branches and 16 deposit-taking ATMs, serving the counties of Greene, Columbia, Albany, and Ulster in the state of NY. The bank has six branches in Greene County, six branches in Columbia County, three branches in Albany County, two branches in Ulster County, and one in Rensselaer County. The bank opened one branch during the evaluation period in Rensselaer County, opening in May 2023. The bank did not close any branches during the evaluation period.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. TBOGC received a "Satisfactory" rating in the prior Community Reinvestment Act (CRA) performance evaluation, dated September 6, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses TBOGC's record of meeting the credit and CD needs of the community, including Low and Moderate Income (LMI) areas. The Office of the Comptroller of the Currency (OCC) used Large Bank CRA evaluation procedures to assess the bank's performance under the Lending, Investment, and Service Tests during the evaluation period of January 1, 2022 through December 31, 2024. For the Lending Test, examiners evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. Examiners placed more weight on small loans to businesses in the state of NY due to the higher volume of small business loans originated or purchased compared to home mortgage loans during the evaluation period. Examiners placed more weight on the 2022-2023 analysis period due to the larger number of loans originated. The OCC did not consider small loans to farms or consumer loans, as the bank did not originate or purchase any such loans during the evaluation period.

Examiners considered the volume of CD loans and the degree of responsiveness of those loans to identified needs within the AAs. To provide perspective regarding the relative level of qualified CD lending, examiners allocated a portion of the bank's tier 1 capital to each AA based on the pro rata share of deposits as a means of comparative analysis. The level of CD lending in each AA had a positive, neutral, or negative effect on the Lending Test rating, as applicable.

The Investment Test considers qualified investments held in the investment portfolio as well as donations and grants made during the evaluation period that had CD as their primary purpose. Qualified investments included those that met the definition of CD and were made prior to or during the current evaluation period and remained outstanding at year end. Examiners considered prior period investments at their book value as of December 31, 2024, and current period investments at their original investment amount.

To provide perspective on the relative level of qualified investments, examiners compared the dollar amount of current and prior period investments to tier 1 capital allocated to each AA based on the pro rata share of deposits. Examiners considered the responsiveness of investments to the needs of the AA, the complexity of investments, and whether the bank acted in a leadership position.

The Service Test considers both retail services and CD services. For retail services, examiners evaluated the geographic distribution of branches among low-, moderate-, middle-, and upper-income census tracts and considered the impact of branch openings and closings during the evaluation period. The availability and effectiveness of alternative delivery systems (ADS), including ATMs, online and mobile banking, and telebanking, were also reviewed for their ability to provide accessible financial services to LMI individuals and geographies. The level and responsiveness of CD services were also evaluated, including volunteer and leadership activities conducted by bank employees and officers that support affordable housing, community services, and economic development benefiting LMI populations.

Limited-scope procedures focused primarily on quantitative data, with consideration of qualitative factors limited to demographic, economic, and competitive conditions. Performance in limited-scope AAs was considered as stronger than, weaker than, or consistent with performance in full-scope AAs. Based on these conclusions, limited-scope performance had a positive, negative, or neutral effect on the overall state rating.

Selection of Areas for Full-Scope Review

In each state where the bank maintains offices, one or more AAs were selected for a full-scope review. For this evaluation, the NY Non-MSA AA was designated for a full-scope review as a majority of the bank's deposits, branches, and lending activity are inside the NY Non-MSA AA. Refer to appendix A for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on its performance in the state of NY. Examiners gave more consideration to the bank's performance within the NY Non-MSA AA when determining the overall state rating as it represents the most significant AA in terms of deposit and lending levels. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at ratings.

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's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits an excellent geographic distribution of loans.
- The bank exhibits an adequate distribution of loans among individuals of different income levels.
- The bank's CD activities show adequate responsiveness to identified community needs in its AA.
- The bank made an adequate level of CD investments, grants, and donations.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels.
- The bank provided an excellent level of CD services. CD services were effective and responsive in addressing community needs.

Description of Institution's Operations in New York

TBOGC has delineated three AAs within the state of NY consisting of the NY Non-MSA AA, the Albany-Schenectady-Troy MSA AA (MSA #10580), and the Kingston MSA AA (MSA #28740). The NY Non-MSA AA consists of the entire counties of Columbia and Greene. The Albany-Schenectady-Troy MSA AA includes the full counties of Albany and Rensselaer, the latter being a newly established addition to this AA. The Kingston MSA AA encompasses the entirety of Ulster County. These delineated AAs encompass the geographies where the bank's main office and branch locations are situated. The AAs meet the requirements of CRA and do not arbitrarily exclude LMI geographies.

According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2024, out of 10 institutions operating in Columbia and Greene County, TBOGC ranked first in deposit market share with 41.9 percent of the market share. Greene County Commercial Bank held 21.9 percent market share. The bank's primary competitor in the AA, KeyBank National Association, held 13.9 percent market share.

As of December 31, 2024, TBOGC had 18 branches within its AAs with 12 branches in the NY Non-MSA, four branches in the Albany-Schenectady-Troy MSA, and two branches in the Kingston MSA. In addition to its branch network, with 16 deposit taking ATMs, the bank also maintained six non-branch offices, which include administrative offices, wealth management offices, and loan production offices.

In 2023, TBOGC expanded its physical presence by opening a new branch in East Greenbush, NY, located in Rensselaer County within the Albany-Schenectady-Troy MSA AA.

NY Non-MSA AA

The bank operates 12 branches inside the NY Non-MSA AA. The majority of the bank's branches fall within this AA. Each of these locations offers traditional weekday hours and most of the branches offer drive-thru services. There were no branches opened or closed in this AA since the last evaluation. The bank had \$1.9 billion in deposits in the AA, which represented 82.7 percent of the bank's total deposits.

The NY Non-MSA AA contains 39 census tracts: 2.6 percent low income, 7.7 percent moderate-income, 48.7 percent middle-income, 38.5 upper-income, and 2.6 percent are without an assigned income classification.

According to the 2024 demographic table below, this AA has a total population of 109,501, encompassing 43,004 households and 26,906 families. The median family income for the AA is \$83,800. Regarding the distribution of families by income level, 17.8 percent are low-income, 13.7 percent are moderate-income, 19.0 percent are middle-income, and 49.4 percent are upper income. Additionally, 7.7 percent of families in the AA live below the poverty level. The NY Non-MSA AA includes 4,652 non-farm businesses and 415 farms.

The following tables provide a summary of the demographics, including housing and business information for the NY Non-MSA AA for each analysis period.

Assessment Area - 2023 NY Non-MSA AA						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	2.56	7.69	48.72	38.46	2.56
Population by Geography	109,501	1.61	7.68	50.26	38.47	1.97
Housing Units by Geography	63,368	1.52	7.40	53.51	37.57	0.00
Owner-Occupied Housing by Geography	32,080	1.46	4.80	51.88	41.86	0.00
Occupied Rental Units by Geography	10,924	3.74	19.90	43.22	33.14	0.00
Vacant Units by Geography	20,364	0.41	4.80	61.59	33.19	0.00
Businesses by Geography	4,423	2.13	14.11	43.66	40.09	0.02
Farms by Geography	394	0.51	4.31	48.98	46.19	0.00
Family Distribution by Income Level	26,906	17.94	13.87	19.11	49.07	0.00
Household Distribution by Income Level	43,004	21.31	14.04	15.70	48.95	0.00
Unemployment rate (%)	4.86	18.21	10.13	3.89	4.72	0.00
Households Below Poverty Level (%)	10.42	38.31	23.42	8.79	8.20	0.00
Median Family Income (Non-MSAs - NY)		\$69,021			Median Housing Value	\$205,000
Median Family Income (Non-MSAs - NY) for 2023		\$83,700			Median Gross Rent	\$927
					Families Below Poverty Level	7.74
FFIEC File - 2020 Census						
2023 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						

Assessment Area - 2024 NY Non-MSA AA						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	2.56	7.69	48.72	38.46	2.56
Population by Geography	109,501	1.61	7.68	50.26	38.47	1.97
Housing Units by Geography	63,368	1.52	7.40	53.51	37.57	0.00
Owner-Occupied Housing by Geography	32,080	1.46	4.80	51.88	41.86	0.00
Occupied Rental Units by Geography	10,924	3.74	19.90	43.22	33.14	0.00
Vacant Units by Geography	20,364	0.41	4.80	61.59	33.19	0.00
Businesses by Geography	4,652	1.91	13.76	43.79	40.52	0.02
Farms by Geography	415	0.48	4.10	49.64	45.78	0.00
Family Distribution by Income Level	26,906	17.82	13.73	19.06	49.39	0.00
Household Distribution by Income Level	43,004	21.26	14.03	15.69	49.01	0.00
Unemployment rate (%)	4.86	18.21	10.13	3.89	4.72	0.00
Households Below Poverty Level (%)	10.42	38.31	23.42	8.79	8.20	0.00
Median Family Income (Non-MSAs - NY)		\$68,606		Median Housing Value		\$205,000
Median Family Income (Non-MSAs - NY) for 2024		\$83,800		Median Gross Rent		\$927
				Families Below Poverty Level		7.74
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						

Housing Affordability

The housing market in the AA is challenged as demand exceeds housing supply, and prices continue to trend upwards. The AA is a high cost housing area, limiting access to affordable home ownership among low-income and moderate-income borrowers.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the FFIEC adjusted median family income of \$83,800 for the AA. According to Realtor.com data, the median housing list price in Columbia County is \$495,000 in 2023 and \$650,000 in 2024, respectively, reflecting a 31.2 percent increase. As for Greene County, the median housing list price is \$479,980 in 2023 and \$485,500 in 2024, respectively, reflecting a 1.2 percent increase. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the median monthly mortgage payment in Columbia County was \$2,657 and \$3,489 in 2023 and 2024, respectively. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), Greene County's unemployment rate fluctuated during the evaluation period, averaging 3.6 percent overall. As of December 2024, the unemployment rate in Greene County was 3.4 percent, declining from 4.1 percent in January 2022. In Columbia County, the unemployment rate also improved from 3.6 percent in January 2022 to 2.9 percent as of December 2024. Both counties consistently reported unemployment rates below the New York State average of 4.2 percent and the national average of 4.1 percent, indicating relatively stronger labor market conditions in the NY Non-MSA AA.

According to the 2024 Greene County Economic Report, healthcare is the leading industry within Greene and Columbia counties. The top employers in the area include Columbia Memorial Health (Healthcare), Taconic Biosciences (genetically engineered mouse and rat models), and GlaxoSmithKline (pharmaceuticals).

To determine local economic conditions and community needs, the examiners reviewed information from a local community organization. This 40-year-old organization's primary purpose is to provide training and counseling to residents throughout the region including Columbia and Greene counties who want to start a business or improve the performance of an existing business. The organization also works with the business owners to help them arrange financing from various sources, including banks, finance companies, and leasing companies. The contact noted home affordability is an issue with a disconnect between housing prices and local income levels. In addition, the contact noted opportunities exist for financial institutions to participate in community development, primarily for the following community needs:

- Affordable Housing.
- Culturally accessible banking products and outreach services for small and minority-owned business.
- Financing for small business loans, particularly start-up businesses.

Scope of Evaluation in New York

Examiners selected the NY Non-MSA AA for analysis using full-scope procedures. The NY Non-MSA AA was the largest AA in the state with 41.9 percent of the deposits and 25.8 percent of the lending activity and received the most weighting when determining conclusions. Examiners analyzed the Albany MSA AA and the Kingston MSA AA using limited-scope procedures. In the full-scope AA, examiners placed more emphasis on small business loans to businesses versus home mortgage loans in arriving at the overall conclusion. Small business loans to businesses represented the majority of TBOGC's lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NY Non-MSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							2022 - 2024
Number of Loans							
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
Full-Scope							
NY Non-MSA AA	627	724	12	1363	68.3	60.3	
Limited-Scope							
Albany-Schenectady-Troy MSA AA Albany	122	171	10	303	15.2	24.4	
Kingston	95	230	3	328	16.5	15.3	
Total	844	1125	25	1,994	100.0	100.0	
Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
Full-Scope							
NY Non-MSA AA	160,759	75,128	4,330	240,217	60.3	60.3	
Limited-Scope							
Albany-Schenectady-Troy MSA AA Albany	43,765	34,271	19,311	97,347	24.4	24.4	
Kingston	23,361	33,478	4,200	61,039	15.3	15.3	
Total	227,885	142,877	27,841	398,603	100.0	100.0	
<i>Source: 1/1/2022 - 12/31/2023 Bank Data.</i>							
<i>Due to rounding, totals may not equal 100.0%</i>							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC's Deposit Market Share Report as of June 30, 2024, out of 10 institutions operating in Columbia and Greene County, TBOGC ranked first in deposit market share with 41.9 percent of the market share.

Based on 2024 peer mortgage data, for home mortgage lending, the bank ranked second out of 186 lenders with a market share of 8.3 percent. Primary competitors were Homestead Funding Corp. with 14.3 percent market share and Broadview Federal Credit Union with 6.9 percent market share.

Based on the 2024 peer small business data, the bank ranked fourth out of 75 lenders by number of loans, with a market share of 7.3 percent. The top three lenders were American Express National Bank with 26.0 percent market share, JPMorgan Chase Bank, NA with 14.5 percent market share, and Synchrony Bank with 8.9 percent market share. The top three small business lenders were institutions with large business credit card portfolios with average loan sizes of \$2,484. TBOGC's average small business loan size was \$6,847.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

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

The geographic distribution of home mortgage loans was excellent.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies significantly exceeded the percentage of owner-occupied housing units located in those geographies and significantly exceeded the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans originated or purchased in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units located in those geographies and significantly exceeded the aggregate percentage of all reporting lenders.

2024

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans originated or purchased in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units located in those geographies and significantly exceeded the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 9 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 originations and purchases of small loans to businesses.

NY Non-MSA

The geographic distribution of small loans to businesses was excellent.

2022-2023

The percentage of small loans to businesses originated or purchased in low-income geographies significantly exceeded the percentage of businesses located in those geographies and significantly exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies significantly exceeded the percentage of businesses located in those geographies and significantly exceeded the aggregate percentage of all reporting lenders.

2024

The percentage of small loans to businesses originated or purchased in low-income geographies significantly exceeded the percentage of businesses located in those geographies. The aggregate percentage of all reporting lenders was not available.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to the percentage of businesses located in those geographies. The aggregate percentage of all reporting lenders was not available.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business geographic lending activity in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited adequate distribution of loans among individuals of different income levels and businesses of different sizes.

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.

NY Non-MSA

The distribution of home mortgage loans among individuals of different income levels was good.

2022-2023

The percentage of home mortgage loans originated or purchased by the bank to low-income borrowers was well below the percentage of low-income families in the AA. However, the bank's lending to low-income borrowers exceeded the aggregate percentage of all reporting lenders, who were also well below demographics. This performance reflects responsiveness to the credit needs of low-income borrowers considering housing market conditions during the evaluation period.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near the percentage of moderate-income families in the AA and comparable to the aggregate percentage of all reporting lenders. This level of lending demonstrates reasonable responsiveness to the credit needs of moderate-income borrowers within the AA.

2024

The percentage of home mortgage loans originated or purchased by the bank to low-income borrowers remained well below the percentage of low-income families in the AA. Performance continued to be influenced by housing affordability pressures, including elevated home prices and interest rates, as well as underwriting constraints associated with the higher-rate environment. Despite these factors, the bank's lending to low-income borrowers exceeded the aggregate percentage of all reporting lenders.

This performance demonstrates responsiveness to the credit needs of low-income borrowers relative to peers, given prevailing market and economic conditions.

The percentage of home mortgage loans originated or purchased by the bank to moderate-income borrowers was well below the percentage of moderate-income families in the AA and well below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 10 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 originations and purchases of small loans to businesses.

NY Non-MSA

The distribution of loans to businesses of different sizes was adequate given performance context.

2022-2023

The percentage of loans to small businesses originated or purchased was significantly below the percentage of small businesses in the AA and well below the aggregate percentage of all reporting lenders. However, annual business revenues were not reported on a significant number, 63.8 percent, of reportable CRA loans. Based on the 177 loans reported using collected revenue information, 61 percent were made to businesses with revenues less than \$1 million. The bank's performance would still be below demographics but exceeded aggregate lending performance which was given positive consideration in our analysis.

2024

The percentage of loans to small businesses originated or purchased was significantly below the percentage of small businesses in the AA; however, data for the aggregate percentage of all reporting lenders was unavailable. Annual business revenues were not reported on 72.3 percent of reportable CRA loans.

Community Development Lending

The bank had made an adequate level of CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

NY Non-MSA

The bank made 12 CD loans totaling \$4.3 million, which represented 2 percent of allocated tier 1 capital. CD loans primarily supported affordable housing and community services to LMI individuals. By dollar volume, 7.1 percent of loans funded affordable housing, and 4.8 percent funded community services targeted towards LMI individuals. The CD loans exhibited adequate responsiveness to CD needs in the AA. CD lending had a neutral impact on the Lending Test conclusion.

The following are examples of CD loans the bank originated in the AA:

- A \$1.5 million loan was provided to finance the rehabilitation and construction of 25 homes for LMI individuals and families. In addition, the loan proceeds were used to assist with repair costs, enabling these same individuals and families to live in safer and more secure environments.
- A \$500,000 line of credit was provided to a non-profit organization that engages in services targeted towards LMI communities and individuals including support survivors of crime and abuse, substance abuse recovery, supportive residences, respite programs, mentoring, after-school programs, peer support, and affordable housing for LMI individuals.
- A \$200,000 line of credit was provided to a non-profit organization that provides programs such as a shelter for battered women, senior volunteer opportunities, energy assistance for home weatherization, and a Community Service Block Grant. The organization also works with an affiliate that grows produce to combat hunger and poverty and offers job training to help LMI individuals gain employment.

Product Innovation and Flexibility

TBOGC used innovative and flexible lending practices to help meet the credit needs of its AA. As detailed below, the bank originated or purchased 35 loans under its innovative and flexible lending programs, totaling \$9.6 million. In addition, the bank offers and provides access to a variety of additional savings and banking programs.

Below are descriptions of the innovative and flexible products offered on a bank wide basis:

FHLBNY Homebuyer Dream Program Grants: This program provides down payment assistance for first-time homebuyers purchasing a home in NY. During the evaluation period, the bank assisted two borrowers to obtain subsidies totaling \$36,000. These home purchases were within the bank's AAs.

SBA 504 Program: The Small Business Association (SBA) 504 Loan Program offers long-term, fixed-rate financing for major fixed assets that support business growth and job creation. Loans are provided through Certified Development Companies SBA-certified, community-based partners that promote local economic development. During the evaluation period, the bank generated four loans totaling \$3.7 million within its AAs.

SBA(7a): This is the SBA's primary program for providing financial assistance to small businesses. Loan terms, including guaranty percentages and amounts, vary depending on the specific loan type. During the evaluation period, the bank generated 5 loans totaling \$1.3 million within its AA.

Cairo Low Interest Loan Program: The bank pledged up to \$5 million to a low interest loan program to promote economic development within the community by supporting small businesses. During the evaluation period, the bank generated 2 loans totaling \$140,000 within its AA.

First Time Home Buyers Program: The bank offers two standalone programs that provide incentives to support homeownership. One program offers down payment assistance for first-time homebuyers purchasing a home in NY, providing a \$1,000 lender credit at closing to help offset down payment or closing costs. The other program provides \$250 in GreeneRewards, which can be redeemed for merchandise or cash at the bank. During the evaluation period, the bank assisted 22 borrowers in obtaining subsidies totaling \$4.3 million within its AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, TBOGC's performance in the Albany MSA AA was adequate, which was weaker than TBOGC's overall performance in the full scope AA. The weaker performance was due to lower geographic distributions and limited CD lending activity. Performance in the limited-scope AA did not alter the overall Lending Test conclusion for the state of New York.

Based on a limited-scope review, TBOGC's performance in the Kingston MSA AA was adequate, which was weaker than TBOGC's overall performance in the full scope AA. The weaker performance was due to lower geographic distributions and limited CD lending activity. Performance in the limited-scope AA did not alter the overall Lending Test conclusion for the state of New York.

INVESTMENT TEST

The bank's performance under the Investment Test in NY is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NY Non-MSA was adequate.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Scope:										
NY Non-MSA	4	476	81	3,402	85	61.1	3,878	37.8	1	165
Limited- Scope:										
Kingston	0	0	19	48	19	13.7	48	0.5	0	0
Albany-Schenectady-Troy	2	1,240	32	5,079	34	24.5	6,319	61.7	0	0
Broader Statewide/Regional Area:										
Statewide/Regional	0	0	1	2	1	0.7	2	0.0	0	0
Total	6	1,716	133	8,531	139	100.0	10,247	100.0	1	165

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank had an adequate level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank made five current period investments totaling \$3.26 million and 76 current period grants totaling \$147,000. As of year-end 2024, the bank also had four prior period investments with an outstanding balance of \$476,000 and one unfunded commitment totaling \$165,000. The combined prior and current period dollar volume represented 1.7 percent of allocated tier 1 capital.

The bank exhibited adequate responsiveness to credit and community economic development needs. A substantial majority of the dollar volume of the bank's investment activity during the current and prior evaluation periods directly supported local municipalities located within LMI census tracts, as well as school districts with elevated levels of students eligible for free or reduced-price lunch programs. A substantial majority of the grants supported organizations that provided community services or affordable housing to primarily LMI individuals. By dollar volume, 25.2 percent of total investments

and grants supported affordable housing, 71.7 percent funded community services to LMI individuals, and 3.1 percent supported economic development and revitalization and stabilization efforts. The bank rarely used innovative and/or complex investments to support CD initiatives.

The following examples demonstrate the bank's responsiveness to community needs:

- A \$1 million investment that supported the construction of connectivity improvement projects in a moderate-income census tract.
- A \$100,000 investment that supported the purchase of highway repair equipment in a low-income census tract.
- A \$20,000 grant to a local organization that provides affordable housing in the AA.
- A \$2,000 donation to a local organization that provides free after school and summer programs primarily to LMI families.

Broader Statewide or Regional Area

Examiners considered broader statewide and regional investments because the bank was responsive to CD needs and opportunities in its AA. TBOGC made one investment totaling \$2,000 in the broader statewide and regional area. This investment supported LMI individuals and families with basic needs for food, shelter, and clothing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, TBOGC's performance under the Investment Test in the Albany MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope NY non-MSA AA due to limited availability of CRA qualified investment opportunities within the AA. The Albany MSA AA is characterized by fewer eligible municipal and CD investment opportunities that meet CRA requirements.

Based on a limited-scope review, the TBOGC's performance in the Kingston MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope NY non-MSA AA due to limited availability of CRA qualified investment opportunities within the AA. The Albany MSA AA is characterized by fewer eligible municipal and CD investment opportunities that meet CRA requirements.

SERVICE TEST

The bank's performance under the Service Test in NY is rated Outstanding.

Conclusions for NY Non-MSA AA Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the NY Non-MSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Assessment Area	Deposits	Branches					Population						
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
NY Non-MSA AA	82.7	12	66.7	8.3	16.7	33.3	41.7	0.0	1.6	7.7	50.2	38.5	2.0
Limited Scope													
Albany-Schenectady-Troy MSA AA	9.7	4	22.2	0.0	0.0	75.0	25.0	0.0	10.9	15.8	42.0	29.0	2.4
Kingston MSA AA	7.6	2	11.1	0.0	50.0	50.0	0.0	0.0	0.0	17.6	68.0	12.9	1.4

*Percentages may not add up to 100% due to populations in the AA that are in geographies with no income distribution.

TBOGC's distribution of branches in LMI geographies exceeded the percentage of the population living within those geographies.

Examiners further considered two middle- or upper-income branches that served LMI geographies within the AA, which improved access and had a positive impact on the retail Service Test conclusion.

TBOGC provides a range of retail banking products and ADS that are responsive to the convenience and needs of LMI individuals and geographies within its AAs. The bank offers a certified BankOn Checking account and a Free e-Checking account, both of which have no monthly maintenance fees or minimum balance requirements. Certain checking products also feature promotional interest rates on small balances, which encourage savings among customers with limited income or assets. These products are available throughout the bank's AAs.

The bank offers a variety of alternative delivery channels (ADC) that enhance accessibility and expand service availability for LMI individuals and geographies. Delivery channels include fully functional online and mobile banking platforms that provide customers with the ability to conduct balance inquiries, bill payments, fund transfers, and mobile check deposits. The bank maintains an automated teller machine (ATM) network consisting of 16 ATMs serving the Hudson Valley and Capital Region. Additionally, the bank utilizes a 24-hour telebanking service to provide additional access for customers who may lack reliable internet connectivity. These systems collectively reduce transaction costs and provide expanded convenient access to financial services for customers when in-person banking is limited.

TBOGC had a variety of ADS including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. TBOGC had 11 ATMs in the AA, all of which were deposit-taking.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
NY Non-MSA AA	0	0	0	0	0	0	
Limited Scope							
Albany-Schenectady-Troy MSA AA	1	0	0	0	0	+1	
Kingston MSA AA	0	0	0	0	0	0	

The bank did not close any branches during the evaluation period. The bank opened one branch in May 2023. The branch is located in an upper-income census tract in the Albany-Schenectady-Troy MSA AA.

Services, including where appropriate, and business hours, did not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at the majority of branch locations in the AA. Most branches had the same lobby hours of 9:00 a.m. to 4:30 p.m. Monday through Friday, and 10 branches were open from 8:30 a.m. to noon on Saturdays. The two branches closed on Saturdays were both in moderate-income geographies. The bank evaluates customer needs and usage patterns when establishing branch hours. One branch has not historically offered Saturday service and continues to effectively serve customers through ADC. The other branch primarily serves municipal customers whose banking activity occurs during the business week, making weekday hours appropriate. Customers at both locations maintain convenient access to banking services through nearby branches and a full range of digital and self-service options. There were 10 locations with drive-thru facilities, operating under similar hours.

Community Development Services

TBOGC was a leader in providing CD services.

During the evaluation period, 19 employees provided services to approximately 23 different organizations, with many serving in leadership capacities on boards or board committees. In total, employees performed approximately 2,368 hours of CD services within the NY Non-MSA. Employees volunteered with nonprofit organizations that deliver essential services to LMI individuals, including healthcare, food assistance, youth programs, scholarships, and school supplies; support the purchase, construction, rehabilitation, or leasing of affordable housing; expand access to affordable housing for low- and moderate-income individuals; and promote economic development by providing financial education, technical assistance, and other support to small businesses.

Service activity examples during the evaluation period include:

- Employees served on various boards, committees, and fundraisers for organizations that provide affordable housing to LMI households. This includes a bank officer serving on a finance committee assisting elderly, family, and special needs households to purchase, build, rehabilitate, or lease safe affordable housing. Another employee served on the board of an organization focused on providing resources for individuals and families to transition to public sector housing.

- A bank officer provided 276 hours as a treasurer for an organization providing education and advocacy to create opportunities that enhance the mental health and well-being of LMI individuals, families, and communities. Services include respite care, mentor program, after school Programs, and hotlines for survivors of crime and/or abuse.
- A bank executive provided 192 hours serving on the finance committee of a foundation that awards grants to not-for-profit organizations providing health care services and supporting related research for communities in Columbia and Greene Counties.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Albany-Schenectady-Troy MSA was weaker than the bank's overall performance under the Service Test in the full-scope area due to poor branch distribution, including the absence of branches in low- and moderate-income census tracts.

Based on a limited-scope review, the bank's performance under the Service Test in the Kingston MSA was stronger than the bank's overall performance under the Service Test, as the bank maintained a branch presence in a moderate-income census tract and demonstrated good accessibility to banking services. Performance in the limited scope AAs did not affect the overall Service Test conclusion for the State of New York.

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 – 12/31/2024	
Bank Products Reviewed:	Home mortgage loans Small business loans Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of New York		
NY Non-MSA	Full-Scope	Columbia and Greene Counties
Albany-Schenectady-Troy MSA	Limited-Scope	Albany and Rensselaer
Kingston MSA	Limited-Scope	Kingston

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
The Bank of Greene County	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
MMSA or State:				
New York	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

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/assessment area.

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

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

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

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

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

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

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 loans are treated the same 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 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
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
2023 Albany-Schenectady-Troy MSA AA	83	31,566	13.11	21,523	3.99	12.05	6.11	10.39	15.66	13.35	48.83	46.99	45.97	36.43	22.89	33.83	0.36	2.41	0.73
2023 Kingston MSA AA	74	18,337	11.69	7,559	--	--	--	14.37	22.97	15.85	68.53	64.86	69.60	14.68	10.81	12.67	2.42	1.35	1.84
2023 NY Non-MSA AA	476	122,374	75.20	5,629	1.46	2.73	1.71	4.80	9.24	5.51	51.88	52.73	52.50	41.86	35.29	40.29	--	--	--
Total	633	172,277	100.00	34,711	2.58	3.63	4.06	10.45	11.69	12.62	54.24	53.40	52.17	31.92	30.81	30.27	0.82	0.47	0.86

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			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
2024 Albany-Schenectady-Troy MSA AA	39	12,199	18.48	8,913	3.99	23.08	6.68	10.39	10.26	14.19	48.83	35.90	45.45	36.43	30.77	32.76	0.36	--	0.90
2024 Kingston MSA AA	21	5,024	9.95	2,975	--	--	--	14.37	14.29	17.34	68.53	71.43	68.20	14.68	14.29	12.50	2.42	--	1.95
2024 NY Non-MSA AA	151	38,384	71.56	2,132	1.46	0.66	1.36	4.80	8.61	5.49	51.88	56.29	51.27	41.86	34.44	41.89	--	--	--
Total	211	55,607	100.00	14,020	2.58	4.74	4.45	10.45	9.48	13.54	54.24	54.03	51.16	31.92	31.75	29.85	0.82	--	0.98

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 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 - 2023	
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	
2023 Albany-Schenectady-Troy MSA AA	83	31,566	13.11	21,523	22.31	4.82	10.85	17.19	13.25	25.47	21.81	12.05	25.00	38.70	39.76	27.83	--	30.12	10.85	
2023 Kingston MSA AA	74	18,337	11.69	7,559	21.66	6.76	6.55	17.88	16.22	17.52	20.41	16.22	23.96	40.05	43.24	43.31	--	17.57	8.67	
2023 NY Non-MSA AA	476	122,374	75.20	5,629	17.94	3.15	2.90	13.87	10.71	10.89	19.11	16.39	20.45	49.07	60.92	56.49	--	8.82	9.27	
Total	633	172,277	100.00	34,711	21.50	3.79	8.63	16.85	11.69	21.37	21.08	15.80	24.03	40.57	56.08	35.85	--	12.64	10.12	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 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																			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	
2024 Albany-Schenectady-Troy MSA AA	39	12,199	18.48	8,913	22.31	--	9.33	17.19	20.51	24.36	21.81	7.69	24.32	38.70	35.90	28.34	--	35.90	13.64	
2024 Kingston MSA AA	21	5,024	9.95	2,975	21.66	14.29	8.10	17.88	9.52	18.79	20.41	23.81	25.51	40.05	42.86	36.44	--	9.52	11.16	
2024 NY Non-MSA AA	151	38,384	71.56	2,132	17.82	4.64	3.00	13.73	4.64	10.60	19.06	17.88	17.92	49.39	64.24	56.33	--	8.61	12.15	
Total	211	55,607	100.00	14,020	21.48	4.74	8.11	16.83	8.06	21.08	21.07	16.59	23.60	40.61	56.87	34.32	--	13.74	12.89	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2023 Albany-Schenectady-Troy MSA AA	120	23,351	15.81	22,057	8.12	3.33	8.52	10.60	7.50	8.86	38.70	57.50	41.14	24.67	30.83	28.13	17.91	0.83	13.35
2023 Kingston MSA AA	150	22,739	19.76	10,647	--	--	--	19.22	25.33	16.68	69.61	61.33	68.83	10.17	13.33	12.43	1.00	--	2.07
2023 NY Non-MSA AA	489	55,412	64.43	6,781	1.11	4.29	2.39	13.24	15.95	11.84	43.77	46.63	49.06	41.85	33.13	36.71	0.04	--	--
Total	759	101,502	100.00	39,485	5.26	3.29	5.17	12.98	16.47	11.48	46.63	51.25	49.97	23.64	28.85	25.37	11.50	0.13	8.02

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2024 Albany-Schenectady-Troy MSA AA	51	10,920	13.93	--	7.30	--	--	9.55	9.80	--	35.86	60.78	--	23.47	27.45	--	23.82	1.96	--
2024 Kingston MSA AA	80	10,739	21.86	--	--	--	--	19.04	22.50	--	68.63	61.25	--	10.39	16.25	--	1.93	--	--
2024 NY Non-MSA AA	235	19,716	64.21	--	1.91	3.40	--	13.76	13.62	--	43.79	51.06	--	40.52	31.91	--	0.02	--	--
Total	366	41,375	100.00	--	5.05	2.19	--	12.11	15.03	--	43.85	54.64	--	22.88	27.87	--	16.11	0.27	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
2023 Albany-Schenectady-Troy MSA AA	120	23,351	15.81	22,057	78.90	15.83	48.92	9.81	35.00	11.29	49.17	
2023 Kingston MSA AA	150	22,739	19.76	10,647	81.71	21.33	52.32	9.82	20.67	8.46	58.00	
2023 NY Non-MSA AA	489	55,412	64.43	6,781	80.17	22.09	52.37	10.15	14.11	9.68	63.80	
Total	759	101,502	100.00	39,485	79.69	20.95	50.43	9.86	18.71	10.46	60.34	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
2024 Albany-Schenectady-Troy MSA AA	51	10,920	13.93	--	80.37	11.76	--	8.44	35.29	11.19	52.94	
2024 Kingston MSA AA	80	10,739	21.86	--	81.85	12.50	--	9.31	13.75	8.83	73.75	
2024 NY Non-MSA AA	235	19,716	64.21	--	80.16	14.89	--	9.48	12.77	10.36	72.34	
Total	366	41,375	100.00	--	80.66	13.93	--	8.76	16.12	10.58	69.95	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%