PUBLIC DISCLOSURE

November 4, 2024

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

The Canandaigua National Bank and Trust Company
Charter Number: 3817

72 South Main Street
Canandaigua, NY 14424

Office of the Comptroller of the Currency

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 following table indicates the performance level of The Canandaigua National Bank and Trust Company with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Canandaigua National Bank and Trust Company Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	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 a High Satisfactory performance in the state of New York.
- The Investment Test rating is based on a Low Satisfactory performance in the state of New York.
- The Service Test rating is based on a Low Satisfactory performance in the state of New York.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment area (AA).

The bank originated and purchased 89.0 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This performance factored positively into the overall analysis of the geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total $
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	5,175	86.6	804	13.4	5,979	1,079,432,010	76.7	327,895,915	23.3	1,407,327,925
Small Business	6,236	91.0	614	9.0	6,850	484,596,000	84.6	88,048,000	15.4	572,644,000
Small Farm	10	100.0	0	0.0	10	857,000	100.0	0	0.0	857,000
Total	**11,421**	**89.0**	**1,418**	**11.0**	**12,839**	**1,564,885,010**	**79.0**	**415,943,915**	**21.0**	**1,980,828,925**

Description of Institution

The Canandaigua National Bank and Trust Company (CNB or bank), established in 1887, is a wholly owned bank subsidiary of Canandaigua National Corporation (CNC) and is headquartered in Canandaigua, New York. CNC, also headquartered in Canandaigua, New York, was formed in 1984 and reported assets of $4.9 billion as of December 31, 2023. CNC also wholly owns CNB's sister bank, Canandaigua National Trust Company of Florida (CNTF), a national trust bank, based in Sarasota, FL, that shares some infrastructure, management, and risk management functions with CNB. Operating subsidiaries of CNB include CNB Mortgage Company (CNBMC), which generates home purchase and refinance loans and is state-regulated, and CNB Insurance Agency, which offers insurance products. CNB also maintains ownership interests in Cephas Capital Partners, LP, a Small Business Investment Company (SBIC), Monroe Fund, a start-up business development corporation, and CNB 2020 QOF, Inc., a qualified opportunity fund established to participate in HUD-designated Opportunity Zones.

CNB is a full-service intrastate bank with 26 banking offices and one trust office serving the Rochester NY Metropolitan Statistical Area (MSA) in the Finger Lakes region of NY State. The bank offers a full range of financial services including traditional deposit and loan products, insurance products, trust services, and investment products, primarily in the bank's branch footprint, to individuals and businesses. CNB's one AA consisted of the Rochester NY Metropolitan Statistical Area (MSA), MSA #40380, in its entirety, which is comprised of Livingston, Monroe, Ontario, Orleans, Wayne, and Yates counties.

CNB reported total assets of $4.9 billion, total deposits of $3.6 billion and tier 1 capital of $403.2 million as of December 31, 2023, which was the end of the evaluation period. Total loans and leases of $3.7 million and total investments of $1 million represented 75.5 percent and 20.4 percent of total assets, respectively. Loan portfolio composition as of December 31, 2023, was as follows: 36.3 percent residential real estate loans, including multifamily and home equity products, 27.1 percent commercial real estate loans, 26.1 percent consumer loans, 10.4 percent commercial/industrial loans, and 0.1 percent other loan types, including agriculture loans. Consumer loans mainly consists of automobile loans.

CNB did not have any legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

The bank received a Satisfactory rating at the last CRA evaluation dated September 7, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's CRA performance under the Large Bank examination procedures, which includes Lending, Investment, and Service Tests. The evaluation period for all tests was January 1, 2021, through December 31, 2023.

The bank's performance was assessed using home mortgage loan products reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses and small loans to farms reported under the CRA. To perform a meaningful analysis, there must have been at least 20 loans originated or purchased for a specific loan product within a respective AA, during one or more of the analysis periods within the overall evaluation period. CNB did not originate a sufficient volume of small farm loans

during the evaluation period to conduct a meaningful analysis. Additionally, performance also included an assessment of community development (CD) activities including CD loans, qualified investments, grants and donations, and CD services for their respective tests.

Performance also included an assessment of qualifying activities performed in response to the significant impact of the COVID-19 pandemic. The OCC considered loans made by the bank under the Small Business Administration's (SBA) Paycheck Protection Program (PPP) as either small loans to businesses under the borrower and geographic distribution of lending analysis or as CD loans, depending on their size.

Management maintained the same AA throughout the evaluation period. However, due to updated 2020 U.S. Census data and census tract income level designation changes that became effective January 1, 2022, the OCC conducted a separate analysis of the bank's lending performance during the January 1, 2021, through December 31, 2021, period (2021 period) and the January 1, 2022, through December 31, 2023, period (2022-2023 period). For mortgage lending activity in 2021, the OCC compared the bank's performance to HMDA peer aggregate lender data as well as the 2015 ACS demographic information. For mortgage lending activity in 2022 and 2023, the OCC compared the bank's performance to HMDA peer aggregate lender data and the 2020 U.S. Census demographic information. The analysis of small business lending focused on the comparison of the bank's performance with data from Dunn & Bradstreet (D&B) and aggregate peer data. At the time of the evaluation, 2023 aggregate small business data was unavailable, thus the 2022 aggregate small business peer data was used in completing the small business analysis during the 2022-2023 period. Aggregate lending and market share percentages considered only lenders that submitted HMDA and small business lending data. Lenders that collected, but did not submit data, were not considered in the percentages. The census changes also impacted branch and population distributions considered in the Service Test analysis.

On June 5, 2020, the OCC published a modernized CRA Rule. The June 2020 CRA Rule was subsequently rescinded on December 14, 2021. The Rule was in effect from October 1, 2020, until December 31, 2021. While in force, the rule expanded bank lending, investment, and services activities that qualified for positive CRA consideration. This included other activities that met the credit needs of economically disadvantaged individuals and entities, low- and moderate-income geographies, and other identified areas of need in banks' communities. The 2020 CRA Rule also expanded the circumstances in which banks received pro-rata consideration for qualifying activities beyond those activities that received consideration under the current framework. Certain CD activities that provided some benefit to, but did not primarily benefit, specified populations, entities, or areas would receive pro-rata credit equal to the partial benefit provided. An activity that met the qualifying criteria under the June 2020 CRA rule that the bank conducted between January 1, 2021, and December 31, 2021, remained a qualifying activity even after rescission of the June 2020 CRA rule and were included in this evaluation.

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) 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 section 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.

For the purposes of this evaluation, CNB's performance was evaluated based on its one and only AA, the Rochester NY MSA AA, which is considered a full-scope AA.

Ratings

The bank's rating is based on performance in the state of New York. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of 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: Low Satisfactory

The major factors that support this rating include:

- Lending activity levels reflected excellent responsiveness to community needs.
- A good distribution of loans to geographies of different income levels and an adequate distribution of loans to borrowers of different income levels.
- A relatively high level of CD loans.
- The bank had an adequate level of qualified investments and grants.
- The bank's service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.
- The bank had a low level of CD service hours.

Description of Institution's Operations in New York

As of December 31, 2023, CNB had 26 branch locations and one trust office serving the Rochester NY MSA AA in the Finger Lakes region of New York State. All but the main branch location had a deposit-taking ATM. Additionally, the bank had two off-site deposit-taking ATMs within the AA, with one located at Eastview Mall and the second attached to a Walgreens Pharmacy location in Rochester.

CNB had one assessment area in the state of New York consisting of the Rochester NY MSA (MSA #40380) in its entirety. The AA, located in the Finger Lakes region of Western NY, is comprised of Livingston, Monroe, Ontario, Orleans, Wayne, and Yates counties. Of the total number of loans (by number volume) originated and/or purchased in the bank's AA during the evaluation, small business loans accounted for 54.6 percent, home mortgage loans accounted for 45.3 percent, and small farm loans accounted for 0.01 percent. The percentage of originations for small business loans was significantly impacted by the significant number of loans originated under the SBA's PPP. In 2021, CNB originated 2,571 PPP loans totaling $143.3 million in the bank's AA to both customers and non-customers under the program, reflecting 70 percent of the number of small business loans (by number) originated. Of these loans, 9.5 percent (by number) were originated in low-income census tracts and 10.4 percent (by number) were originated in moderate-income census tracts.

Based on the Federal Deposit Insurance Corporation (FDIC) deposit information as of June 30, 2023, CNB reported deposits totaling $3.6 billion within the AA, representing 100 percent of CNB's deposits. CNB ranked second in deposit market share with 15.6 percent market share among its 26 branch locations out of 18 FDIC-insured depository institutions. Manufacturers and Traders Trust Company ranked first with 17.3 percent market share with 29 branch locations, and JP Morgan Chase Bank, N.A. ranked third with 14.9 percent with 23 branch locations.

Economic Data

Based on data from the September 2023 Moody's Analytic report, the Rochester NY MSA struggled to maintain momentum throughout the year. The MSA historically relied on legacy manufacturers to create employment opportunities, such as Kodak and Xerox. Although once significant drivers of the private sector, they have been troubled with sizeable layoffs over the years. Education and healthcare sectors anchored the economy as the area's "safety net," with stability and the support of higher-waged jobs. Enrollment at major educational institutions including the University of Rochester (UR) and Rochester Institute of Technology (RIT), which are also both in the top five employers in the MSA, respectively, bounced back above pre-pandemic levels with RIT leading the charge. The increased enrollments resulted in increased spending, housing, and workforce development. Although out-migration was a concern in the MSA, the MSA did not experience the level of out-migration and mortgage delinquencies that the state experienced, partially due to a housing price-correction in mid-2022. However, housing prices continued to rise, with the MSA seeing the highest share of sales above-asking price of any large metro areas. This coupled with a shortage in inventory, which was steepened by a lack of new construction, continued to impact housing affordability in the MSA.

According to the December 2023 U.S. Bureau of Labor Statistics (BLS) data, the unemployment rate (not seasonally adjusted) in the Rochester NY MSA was 4.1 percent, compared to 3.2 percent in December 2022 and 3.1 percent in December 2021. The MSA unemployment rate was favorable to the 4.6 percent unemployment rate for the state of New York as of December 2023. Per Moody's Analytics, leading industries by wage in the MSA included management of companies & enterprises, computer system design, architectural and engineering, and physicians, all of which require a higher level of expertise and education. Education and health services, government, and professional and business services are the top employment industries with 24.7 percent, 14.3 percent, and 12.7 percent, respectively. Top employers included the University of Rochester, Rochester Regional Health System, Wegmans Food Markets Inc., Paychex Inc., and Rochester Institute of Technology.

The OCC considered housing costs in relation to the median family incomes in the AA, which limited housing affordability for low-income borrowers. Per Realtor.com, the median single family residence list price in the MSA declined approximately 3.8 percent over the evaluation period from $259,900 in 2021 to $249,900 in 2023. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Based on the 2023 Federal Institutions Examination Council (FFIEC) median family income (MFI) ranges, low-income and moderate-income families earned less than $48,650 and between $48,650 and $77,840 in the AA, respectively. This calculated to a maximum monthly mortgage payment of $1,216 for a low-income borrower and $1,946 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for a down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Rochester NY MSA median housing value of $249,900 would be $1,342. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in the AA; however, would be affordable for moderate-income borrowers.

Community Contact

The OCC relied on information from four community contacts conducted during the evaluation period within the Rochester NY MSA AA for the purpose of determining a community profile, identifying opportunities for participation by local financial institutions and determining the performance of local

financial institutions in meeting the credit needs of the community. The contacts represented organizations focused on providing services and advocacy for low- and moderate-income individuals and households within the AA. Community contacts indicated a need for affordable housing for both homeowners and renters due to the increased cost of housing and a low housing inventory in the AA. Community contacts also cited there is a need for accessibility to bank branches in disadvantaged neighborhoods, specifically in the northeast and southwest sections of Rochester, livable working wages, financial literacy, and affordable banking products for consumers with impaired credit. Additionally, financial assistance programs are needed for mortgage downpayment, closing cost, interest rate buy downs, flexible underwriting criteria, credit repair services, and home rehabilitation assistance for low- and moderate-income individuals and first-time home borrowers to afford homeownership and avoid foreclosure and evictions.

The following tables provide a summary of the demographics, including housing and business information for the Rochester NY MSA AA.

Rochester NY MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester NY MSA AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	272	16.2	16.2	41.9	22.4	3.3
Population by Geography	1,083,156	9.0	14.1	47.9	28.1	0.9
Housing Units by Geography	473,557	9.5	15.0	49.2	26.2	0.1
Owner-Occupied Units by Geography	290,032	3.4	11.3	53.2	32.1	0.0
Occupied Rental Units by Geography	140,427	19.8	21.8	39.9	18.3	0.1
Vacant Units by Geography	43,098	17.2	17.9	52.9	11.9	0.1
Businesses by Geography	85,024	9.4	12.7	44.0	33.6	0.2
Farms by Geography	3,071	2.1	7.5	66.8	23.6	0.0
Family Distribution by Income Level	268,759	21.9	17.1	19.9	41.0	0.0
Household Distribution by Income Level	430,459	24.4	16.1	17.5	42.1	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		$67,757	Median Housing Value			$130,392
			Median Gross Rent			$810
			Families Below Poverty Level			10.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester NY MSA AA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	317	12.3	19.6	40.1	23.3	4.7
Population by Geography	1,090,135	9.3	18.5	43.4	27.6	1.3
Housing Units by Geography	482,206	9.1	20.2	44.8	25.3	0.6
Owner-Occupied Units by Geography	293,649	3.9	16.6	47.8	31.5	0.2
Occupied Rental Units by Geography	144,584	17.8	26.2	38.7	15.8	1.5
Vacant Units by Geography	43,973	14.9	24.4	44.9	14.9	1.0
Businesses by Geography	104,632	6.2	16.6	42.3	32.1	2.7
Farms by Geography	3,539	1.8	15.7	56.8	25.1	0.6
Family Distribution by Income Level	269,249	21.4	17.7	20.6	40.4	0.0
Household Distribution by Income Level	438,233	24.7	15.7	17.8	41.9	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		$80,423	Median Housing Value			$147,191
			Median Gross Rent			$926
			Families Below Poverty Level			8.9%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in New York

CNB's performance was evaluated based on its one and only AA, the Rochester NY MSA AA, which is considered a full-scope AA. The OCC placed more emphasis on small loans to businesses versus home mortgage loans in arriving at overall conclusions as they represented the majority of lending over the entire evaluation period. The OCC considered the significant number of small business loans originated under the SBA PPP during the 2021 period. The OCC also placed more emphasis on geographic distribution performance given the high level of home mortgage and small loans to businesses without reported income information. The OCC also placed more emphasis on geographic distribution performance given the high level of home mortgage and small loans to businesses without reported income information.

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 Rochester NY MSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Rochester NY MSA AA	5,175	6,236	10	36	11,457	100.0	100.0

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

Dollar Volume of Loans ($000s) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Full-Scope							
Rochester NY MSA AA	1,079,432	484,596	857	25,421	1,590,306	100.0	100.0

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

According to the FDIC's Summary of Deposits as of June 30, 2023, CNB ranked second out of 18 depository institutions (89th percentile) with a deposit market share of 15.6 percent.

Based on 2023 HMDA market share data, CNB ranked third out of 252 lending institutions (98th percentile), for home mortgage loan originations and purchases with a market share of 6.6 percent, demonstrating an excellent responsiveness to credit needs when compared to the bank's deposit market share rank. The top five home mortgage lenders, ESL Federal Credit Union, Premium Mortgage Corporation, CNB, Citizens Bank N.A., and Genesee Regional Bank, had a combined market share of 47.1 percent. Market share for the top five lenders ranged from 4.1 to 21.7 percent.

Based on 2022 CRA small business loan data, the bank ranked fourth out of 116 lending institutions (96th percentile) for small loans to businesses representing with a market share of 6.5 percent. The top five lenders, American Express National Bank, JP Morgan Chase Bank N. A., Capital One N.A., CNB and Synchrony Bank, had a combined market share of 58.3 percent. Market share for the top five lenders ranged from 5.1 to 22.1 percent. Of the top five lenders, CNB had a higher average loan size than its competitors, given the bank's focus is not on credit card lending. CNB's average loan size was $123,969 compared to an average loan size between $4,400 and $60,000 for the other four lenders. This demonstrates stronger performance than what the market share ranking indicates.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O 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.

The geographic distribution of home mortgage loans was good.

2021

The geographic distribution of home mortgage loans was good. The geographic distribution of mortgage loans originated or purchased in low-income census tracts exceeded the percentage of both owner-occupied housing and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts was near-to the percentage of both owner-occupied housing units and aggregate lending in the AA.

2022-2023

The geographic distribution of home mortgage loans was good. The geographic distribution of home mortgage loans originated or purchased in low- income census tracts exceeded the percentage of both owner-occupied housing and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income geographies was below the percentage of both owner-occupied housing and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q 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.

The geographic distribution of small loans to businesses was good.

2021

The geographic distribution of small loans to businesses was good. The geographic distribution of small loans to businesses originated or purchased in low-income census tracts exceeded both the percentages of businesses and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts was below the percentage of businesses located in those geographies and near-to the aggregate lending in the AA.

2022-2023

The geographic distribution of small loans to businesses was excellent. The geographic distribution of small loans to businesses originated or purchased in low-income census tracts was below the percentage of businesses but equaled the aggregate percentage of lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeded the percentage of both businesses and aggregate lending in the AA. More emphasis was placed on lending to businesses in moderate-income census tracts as there was limited opportunities to lend in low-income tracts based on the percentage of businesses in these tracts. Additionally, more emphasis was placed on performance compared to the bank's peers in low- and moderate- income tracts, demonstrating the bank's strong performance.

Lending Gap Analysis

The OCC analyzed CNB's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. The OCC did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P 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.

The borrower distribution of home mortgage loans to individuals of different income levels was poor.

2021

The distribution of home mortgage loans among individuals of different income levels was poor. The OCC considered housing costs in relation to median family incomes in the AA, which limited the affordability for low-income families. In addition, 71.2 percent of bank loans were purchased loans for which the bank did not report borrower income. As such, more weight was placed on the bank's good distribution of home mortgage loans in the AA in arriving at overall conclusions.

The borrower distribution of home mortgage loans to both low- and moderate-income borrowers in the AA was significantly below both the percentage of low- and moderate-income families in the AA and the aggregate percentage of all reporting lenders in the AA.

The OCC completed an updated borrower-income distribution analysis of additional income information provided by the bank for the purchased loans, which demonstrated that 6.8 percent and 16.9 percent of the bank's home mortgage loans were originated to low- and moderate-income borrowers, respectively, and represents performance more in-line with demographic data and aggregate performance.

2022-2023

The distribution of home mortgage loans among individuals of different income levels was poor. The OCC considered housing costs in relation to median family incomes in the AA, which limited the affordability for low-income families. In addition, 65.4 percent of bank loans were purchased loans for which the bank did not report borrower income. As such, more weight was place on the bank's good distribution of home mortgage loans in the AA in arriving at overall conclusions.

The borrower distribution of home mortgage loans to both low- and moderate-income borrowers in the AA was significantly below both the percentage of low- and moderate-income families in the AA and the aggregate percentage of all reporting lenders in the AA.

The OCC completed an updated borrower-income distribution analysis of additional income information provided by the bank for the purchased loans, which demonstrated that 8.3 percent and 17.9 percent of home mortgage loans were originated to low- and moderate-income borrowers, respectively, and represents performance more in-line with demographic data and aggregate performance.

The overall assessment of performance also considered the bank's market share of originated or purchase home loans to low- and moderate-income families compared to its overall market share along with the improving trend in garnering market share of low- and moderate-income families. In 2021, CNB ranked seventh with 4.5 percent market share in the AA, 22nd with 0.9 percent market share for loans to low-income borrowers, and 24th with 0.9 percent market share for loans to moderate-income borrowers. In 2023, CNB ranked third with 6.6 percent market share in the AA, 13th with 2.1 percent market share for loans to low-income borrowers, and 13th with 2 percent market share for loans to moderate-income borrowers.

Small Loans to Businesses

Refer to Table R 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 origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was adequate.

2021

The distribution of loans to businesses of different sizes was poor. The percentage of loans to small businesses originated or purchased was significantly below the percentage of both small businesses in the AA and the aggregate percentage of all reporting lenders.

The OCC considered the impact of the high percentage of small loans to business with revenue information unavailable on the borrower distribution analysis. For 78.9 percent of small loans to businesses in the AA, borrower revenue information was not available. Most of these loans, or 89.1 percent, were SBA PPP loans which did not require the bank to collect or consider gross annual revenues. The bank's PPP lending was positively considered in our assessment of the Distribution of Loan by Income Level of the Borrower.

2022-2023

The geographic distribution of small loans to businesses was good. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CNB originated 36 CD loans totaling $25.4 million in the Rochester NY MSA AA representing 6.3 percent of tier 1 capital. The originations included 25 loans totaling $12.2 million for affordable housing, seven loans totaling $10.9 million for revitalization and stabilization, and four loans totaling $2.4 million for community service. CD lending had a positive impact on the Lending Test conclusion. Examples of CD loans included the following:

- A $1.6 million commercial real estate loan to facilitate the purchase of three multifamily properties, providing 45 affordable housing units to low- and moderate-income individuals in the AA.
- A $1.7 million to purchase two multifamily apartment buildings, which include 25 affordable housing units benefitting low- and moderate-income individuals in the AA.
- The bank originated a $1.4 million working capital line of credit to a community services organization that provides services to formerly incarcerated individuals in transitioning to civilian life and aid in finding permanent housing.
- The bank made seven SBA PPP loans totaling $10.9 million to businesses for the purpose of retaining employees and paying certain operational expenses incurred by the COVID-19 pandemic.

The bank also made two loans totaling $1.2 million, or 0.3 percent of tier 1 capital, to an organization that provides legal aid to primarily low- or moderate-income individuals in the broader-statewide area, including the bank's AA. This had a neutral effect on the bank's CD lending.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices to serve AA credit needs.

CNB offered several affordable home loan programs in the AA including the LMI Home Improvement Loan Sale, Homebuyer Dream, Small Business Recovery, and Flood Relief programs.
- The LMI Home Improvement Loan Sale program offers loans of up to $10,000 at discounted interest rates, no application fees or closing costs, and no equity required to borrowers residing in LMI census tracts. During the evaluation period, the bank originated 25 loans totaling $214,000 under this program.
- The Homebuyer Dream program is a bank-hosted program offered through the Federal Home Loan Bank (FHLB) of New York which assists low- and moderate-individuals and families with a grant of up to $20,000 for a home mortgage down payment and closing costs. During the evaluation period, CNB facilitated 158 grants through the Homebuyer Dream Program, totaling $1.6 million.
- CNB hosted the FHLB Small Business Recovery Grant Program which provided grant funding for qualifying small businesses that suffered a decline in revenue because of the ongoing COVID-19 pandemic. During the evaluation period, CNB secured grants for 21 customers including $90,000 for small businesses and $10,000 for nonprofit organizations through the Small Business Recovery Grant Program. Of the $100,000 in grants, 19 customers were in moderate-income census tracts.
- The Flood Relief program was a bank-hosted program which offered loans of up to $10,000 at discounted interest rates and no qualification requirements to customers impacted from flood disasters from August to November 2023 in the AA. During the evaluation period, the bank originated 23 loans totaling $223,000 under this program.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibited adequate responsiveness to credit and community economic development needs. The institution did not use innovative and/or complex investments to support CD initiatives.

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										
Rochester NY MSA	1	11,000	91	1,717	92	97.9	12,717	83.8	0	0
Statewide/Regional										
Broader New York	0	0	2	2,453	2	2.1	2,453	16.2	0	0
Total	**1**	**11,000**	**93**	**4,170**	**94**	**100.0**	**15,170**	**100.0**	**0**	**0**

* 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.

During the evaluation period, CNB provided 91 qualifying investments and donations totaling $1.7 million. The total dollar volume of current- and prior-period qualified investments and donations represented 3.2 percent of tier 1 capital.

The bank made 89 CD donations and grants totaling $184,613 to 45 different organizations within the AA. By number of investments, 81 percent were for community service to 34 organizations that provided needed services to low- and moderate-income individuals, 13.6 percent were for affordable housing to 10 organizations, and 5.4 percent were to revitalization and stabilization efforts to one organization. As of December 31, 2023, the remaining balance of prior period investments consisted of one Qualified Opportunity Fund totaling $11 million. Examples of CD investments in the AA included:

- The bank purchased two mortgage-backed securities (MBS) totaling $4 million. The MBS were secured by home loans to low- and moderate-income borrowers. Nine of the 24 mortgage loans securing the MBSs were inside the AA and totaled $1.5 million. The remaining properties securing the MBS were outside the bank's AA, but within the broader statewide or regional area. Because the bank was responsive to the CD needs and opportunities in the AA, the $2.5 million in broader statewide or regional investments that do not have a purpose, mandate, or function to serve the AA received consideration. The $2.5 million in the broader statewide or regional area represented 0.6 percent of tier 1 capital and further supported the bank's adequate performance.

- Three donations totaling $13,000 to a local 76-bed emergency shelter. The organization provides food, clothing, and shelter to unhoused individuals and emergency financial assistance to low- and moderate-income individuals.
- Two donations totaling $19,000 to a local refugee center. The organization offers housing assistance and educational and career advancement programs to refugees resettling in the Rochester area.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System												2021
	Deposits	Branches						Population				
Assessment Area	% 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	Low	Mod	Mid	Upp	
Full-Scope												
Rochester NY MSA AA	100.0	26	100.0	3.8	11.5	46.2	38.5	9.0	14.1	47.9	28.1	

Distribution of Branch Delivery System												2022-2023
	Deposits	Branches						Population				
Assessment Area	% 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	Low	Mod	Mid	Upp	
Full-Scope												
Rochester NY MSA AA	100.0	26	100.0	3.8	11.5	38.5	42.3	9.3	18.5	43.4	27.6	

*3.8 percent of the bank's branch locations were in an unknown census tract.

At the end of 2023, the bank operated 26 branches in the AA, with one branch in a low-income census tract and three branches in moderate-income census tracts. The proportion of branches located in low-income or moderate-income census tracts was well below the proportion of the population living in low-income tracts and was near to the proportion of the population living in moderate-income census tracts. However, the bank operated eight branches located in middle- or upper-income census tracts that were

adjacent to LMI areas, thus providing accessibility to the population in those census tracts. The bank's Henrietta, Penfield, Honeoye, Irondequoit, Lakeshore, Victor, Webster Jackson-Ridge, and Greece Latta & Long Pond branches were each adjacent to one or more moderate-income census tracts. The bank's Brighton branch in an upper-income census tract was adjacent to a low-income census tract. The Rochester-East Main branch which was in a census tract where the income data is unknown was adjacent to a low-income census tract and a moderate-income census tract.

The assessment of performance also considered demographic changes that occurred to several census tracts during the review period. Demographic changes that occurred between 2015 ACS data and 2020 U.S. Census Bureau data indicate that during the review period CNB's Geneva branch census tract designation changed from middle-income to moderate-income; the College Town branch in Rochester changed from moderate-income to low-income; the Rochester-East Main branch changed from low-income to income unknown; the Lakeshore branch changed from moderate-income to upper-income; and the Alexander Park branch changed from a middle-income to moderate-income census tract.

Distribution of Branch Openings/Closings						
			Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
Assessment Area	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp
Full-Scope						
Rochester NY MSA AA	1	0	0	0	1	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. CNB opened its Geneva branch in July 2021, which was in a middle-income census tract that was adjacent to a moderate-income census tract. As of 2022, the census tract was designated as moderate-income.

Services, including where appropriate, business hours, did not vary in a way that inconveniences the bank's AA, particularly low- and moderate-income geographies and/or individuals. All branches are open Monday through Friday from 9:00 a.m. to 5:00 p.m. and most branches offer Saturday hours from 9:00 a.m. to 1:00 p.m. The College Town branch, which is in a low-income census tract, and the Canandaigua branch, which is in a moderate-income census tract, do not offer Saturday hours as both branches have low transaction volumes that do not support the need for weekend hours. However, the College Town branch is located approximately 2.5 miles from the Alexander Park branch, which is in a moderate-income census tract, and offers Saturday hours. The Canandaigua branch is located 1 mile from the Lakeshore branch, which is adjacent to two moderate-income census tracts and offers Saturday and Sunday hours. The Brighton branch, which is adjacent to a low-income census tract also offers Saturday and Sunday hours. Additionally, the bank offers a customer call center and live chat with an online bank representative, which is available Monday through Friday from 8:00 a.m. to 8:00 p.m. and Saturday and Sunday from 9:00 a.m. to 1:00 p.m.. The bank makes available language translation services that support 170 languages, including sign language for customers needing translation assistance.

CNB offered alternative delivery systems including ATMs, mobile banking, online banking, telephone banking, direct deposit. These systems provided additional delivery availability and access to banking

services to both retail and business customers. All branch locations had deposit-taking ATMs except for the Rochester East Main branch location, which was not deposit-taking. In addition, the bank operates eight off-site ATMs throughout Canandaigua, Victor, Rochester, and Geneva, two of which are deposit-taking. One of these enhanced offsite ATMs is in a low-income census tract in Rochester. The bank also shares 70 non-proprietary cash-dispensing ATMs at Speedway, Rite Aid, and Walgreens locations throughout the AA and in neighboring towns. The bank also provides ATM withdrawals free-of-charge to recipients of New York State Public Assistance through the Electronic Benefits Transfer Program (EBT), regardless of whether the recipient is a customer of the bank.

Community Development Services

The institution provides a low level of CD services.

During the evaluation period, 20 employees provided services to 21 different organizations including serving in board or board committee leadership roles. Employees provided approximately 1,669 service hours in the bank's AA or the broader statewide or regional area that includes the bank's AA. Of those hours, leadership was evident through board or committee participation with 16 bank officers providing 1,597 service hours over the evaluation period. By count, 1,389 hours, or 83.2 percent, were provided to community service organizations, 232 hours, or 13.9 percent, were provided to affordable housing organizations, and 48 hours, or 2.9 percent, were provided to organizations that promote economic development.

The following are examples of community development services provided during the evaluation period:

- A bank officer served on the board of directors as assistant treasurer of an affordable housing organization providing 180 service hours over the evaluation period. The mission of the organization is to bring people together to build homes, community and hope and offer affordable housing to low- and moderate-income individuals.
- An employee contributed 12 hours of service as loan committee member for an economic development organization focused on revitalizing underserved neighborhoods. The organization focused on supporting and investing in entrepreneurs and small businesses to foster job creation.
- An employee contributed 52 hours of service as a finance committee member for an organization targeted to low- and moderate-income refugees resettling in the Rochester area. The mission of the organization is to provide refugees with services, resources, training, and other supports to allow them to assimilate into society and be self-sustaining.

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:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage and small business loans Community development loans, qualified investments, and community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
New York		
Rochester NY MSA AA	Full-Scope	Livingston, Monroe, Ontario, Orleans, Wayne, and Yates counties

Appendix B: Summary of MMSA and State Ratings

RATINGS The Canandaigua National Bank and Trust Company				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
New York	High Satisfactory	Low Satisfactory	Low Satisfactory	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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of $1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §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 investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

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

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

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

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

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

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

MMSA (state): 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.

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

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

Table Q. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.

Table R. **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.

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

Table S. **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. **Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to $500,000) originated and purchased by the bank to farms with revenues of $1 million or less to: 1) the percentage distribution of farms with revenues of greater than $1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table U. **Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table V. **Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography — **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Rochester NY MSA AA	1,940	409,401,303	100.0	41,241	3.4	5.4	2.6	11.3	9.7	10.4	53.2	43.4	50.8	32.1	41.4	36.2	0.0	0.1	0.0
Total	1,940	409,401,303	100.0	41,241	3.4	5.4	2.6	11.3	9.7	10.4	53.2	43.4	50.8	32.1	41.4	36.2	0.0	0.1	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: 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	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
Rochester MSA NY AA	3,235	670,030,707	100.0	23,485	3.9	7.5	5.4	16.6	14.0	17.4	47.8	43.3	46.1	31.5	34.9	30.9	0.2	0.3	0.3
Total	3,235	670,030,707	100.0	23,485	3.9	7.5	5.4	16.6	14.0	17.4	47.8	43.3	46.1	31.5	34.9	30.9	0.2	0.3	0.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower   **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Rochester NY MSA AA	1,940	409,401,303	100.0	41,241	21.9	1.8	10.0	17.1	4.5	23.2	19.9	6.4	23.2	41.0	16.0	33.7	0.0	71.2	10.0
Total	1,940	409,401,303	100.0	41,241	21.9	1.8	10.0	17.1	4.5	23.2	19.9	6.4	23.2	41.0	16.0	33.7	0.0	71.2	10.0

Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: 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	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Rochester NY MSA AA	3,235	670,030,707	100.0	23,485	21.4	2.9	10.6	17.7	6.3	22.9	20.6	8.0	22.6	40.4	17.3	31.3	0.0	65.4	12.6
Total	3,235	670,030,707	100.0	23,485	21.4	2.9	10.6	17.7	6.3	22.9	20.6	8.0	22.6	40.4	17.3	31.3	0.0	65.4	12.6

Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography — **2021**

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	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Rochester NY MSA AA	3,658	258,678,000	100.0	23,437	9.4	9.8	7.9	12.7	10.1	11.1	44.0	40.8	46.8	33.6	39.3	33.7	0.2	0.0	0.4
Total	3,658	258,678,000	100.0	23,437	9.4	9.8	7.9	12.7	10.1	11.1	44.0	40.8	46.8	33.6	39.3	33.7	0.2	0.0	0.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of 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	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Rochester NY MSA AA	2,578	225,918,000	100.0	20,259	6.2	4.8	4.8	16.6	16.8	16.2	42.3	45.3	45.6	32.1	30.4	31.2	2.7	2.7	2.2
Total	2,578	225,918,000	100.0	20,259	6.2	4.8	4.8	16.6	16.8	16.2	42.3	45.3	45.6	32.1	30.4	31.2	2.7	2.7	2.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Rochester NY MSA AA	3,658	258,678,000	100.0	23,437	85.5	13.3	46.6	4.7	7.8	9.8	78.9
Total	**3,658**	**258,678,000**	**100.0**	**23,437**	**85.5**	**13.3**	**46.6**	**4.7**	**7.8**	**9.8**	**78.9**

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Rochester NY MSA AA	2,578	225,918,000	100.0	20,259	88.2	50.9	50.3	3.7	24.0	8.1	25.1
Total	**2,578**	**225,918,000**	**100.0**	**20,259**	**88.2**	**50.9**	**50.3**	**3.7**	**24.0**	**8.1**	**25.1**

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Rochester NY MSA AA	4	110,000	100.0	511	2.1	0.0	0.0	7.5	0.0	5.5	66.8	75.0	83.0	23.6	25.0	10.3	0.0	0.0	1.2
Total	**4**	**110,000**	**100.0**	**511**	**2.1**	**0.0**	**0.0**	**7.5**	**0.0**	**5.5**	**66.8**	**75.0**	**83.0**	**23.6**	**25.0**	**10.3**	**0.0**	**0.0**	**1.2**

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | **2022-2023**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Rochester NY MSA AA	6	747,000	100.0	458	2.0	0.0	0.0	15.0	0.0	17.2	55.4	66.7	68.0	27.0	33.3	13.9	0.6	0.0	0.9
Total	**6**	**747,000**	**100.0**	**458**	**2.0**	**0.0**	**0.0**	**15.0**	**0.0**	**17.2**	**55.4**	**66.7**	**68.0**	**27.0**	**33.3**	**13.9**	**0.6**	**0.0**	**0.9**

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues   **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Rochester NY MSA AA	4	110,000	100.0	511	95.6	25.0	40.2	3.1	50.0	1.4	25.0
Total	**4**	**110,000**	**100.0**	**511**	**95.6**	**25.0**	**40.2**	**3.1**	**50.0**	**1.4**	**25.0**

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues   **2022-2023**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Rochester NY MSA AA	6	747,000	100.0	458	95.9	66.7	49.7	2.7	33.3	1.4	0.0
Total	**6**	**747,000**	**100.0**	**458**	**95.9**	**66.7**	**49.7**	**2.7**	**33.3**	**1.4**	**0.0**

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%