



PUBLIC DISCLOSURE

October 6, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Bank, N.A.
Charter Number: 8531

45-49 Court Street
Canton, NY 13617

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 Community Bank, National Association (CBNA) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Community Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the Outstanding ratings in the state of Vermont and New York, the High Satisfactory rating in the state of Massachusetts, and the Low Satisfactory rating in the state of Pennsylvania.
- The Investment Test rating is based on the High Satisfactory ratings in the state of New York, Massachusetts, Pennsylvania, and Vermont.
- The Service Test rating is based on the High Satisfactory ratings in the states of Pennsylvania, Massachusetts, and Vermont, and the Low Satisfactory rating in the state of New York.

Innovative or Flexible Lending Products

CBNA offers retail and commercial innovative lending programs in all states. The bank offered affordable lending products for low- and moderate-income borrowers through the U.S. Department of Agriculture (USDA) and small businesses through the USDA, Small Business Administration (SBA), Opportunities for Otsego, Farm Service Agency (FSA), and several local development agencies.

Retail Housing Products

The bank offers a No Closing Cost (NCC) Portfolio Program to all borrowers. This product helps

borrowers with limited savings buy a home. The bank covers all mortgage-related costs, including title, filing fees, bank legal fees, appraisal, application, and underwriting or processing fees. This allows the borrower to use funds that would usually be needed for these costs toward the down payment on the home. The bank offers terms of 10, 15, 20, and 30 years, a low down payment option (up to 97 percent loan-to-value (LTV)) and follows established underwriting standards. Historically, 46 percent of the product was originated to low- and moderate-income individuals. During the evaluation period, CBNA originated 3,000 loans to low- and moderate-income individuals or \$427.9 million across all assessment areas (AAs).

CBNA utilizes the Federal National Mortgage Association (FNMA) HomeReady Mortgage Program as an innovative lending option designed to help creditworthy low- and moderate-income borrowers access an affordable, sustainable mortgage. This program's features include low-down payment financing for home purchases (up to 97 percent LTV) and flexible sources of funds for down payments. During the evaluation period, the bank originated 17 loans for \$2.3 million.

CBNA utilizes the Homebuyer Dream Program (HDP), which is offered through the Federal Home Loan Bank (FHLB) of New York's Affordable Housing Program. It provides grant funds to assist with down payments and closing costs for first-time homebuyers earning at or below 80 percent of the Area Median Income in the county where they are purchasing. CBNA participated in the HDP program, which is available to any eligible borrower purchasing a home within CBNA's AAs comprising eligible counties in New York, Pennsylvania, Massachusetts, and Vermont. In 2022 and 2023, the program offered up to \$10,000 in grant money, and 2024, the grant amount increased to \$20,000. During the evaluation period, the bank originated 67 loans for approximately \$7 million within its various AAs.

CBNA utilizes the Special Purpose Credit Program. This product provides 100 percent financing with no private mortgage insurance (PMI) required and no closing costs to achieve homeownership in certain census tracts within the state of New York. The program has been in effect since 2022, with its coverage area expanding each year, and is available on specific dates. The bank covers all mortgage-related costs such as title, filing fees, bank legal fees, appraisal, application, and underwriting/processing fees. During the evaluation period, the bank originated 305 loans for \$49.3 million within its various AAs.

CBNA utilizes the Affordable Homeownership Grant Program, for low- and moderate-income individuals through several nonprofit agencies involved in affordable housing. These agencies provide grant funds to low- and moderate-income homebuyers to help cover the down payment. The bank also offers mortgages with below internal portfolio rates for the conventional NCC product. CBNA collaborates closely with many housing agencies in the bank's service markets. During the evaluation period, the bank originated 114 loans for \$12 million in its various AAs.

CBNA participates in the Guaranteed Rural Housing Program through the USDA and is listed as an approved USDA lender. The program offers mortgages with low or no down payments, eliminating the need for PMI, and features 30-year loan terms, flexible underwriting criteria, and minimal cash reserve requirements. This program is not limited to first-time homebuyers but is restricted by geographic area. During the evaluation period, the bank originated 18 loans for \$2.4 million.

The bank participates in Department of Veterans' Affairs (VA) programs. The VA offers programs to eligible veterans, active-duty service members, and eligible surviving spouses, reservists, and National Guard members. The loan features no down payment, no PMI, and competitive interest rates. The loans are sold to investors at Franklin American Mortgage Company. The bank also offers disaster relief

programs to assist individuals with repairing their property, cleaning up, and getting back on their feet. During the evaluation period, the bank originated 30 loans for \$6.8 million in VA loans.

The bank created a community development lender position to assist low- and moderate-income individuals obtain home mortgages. The lender meets with low- and moderate-income individuals to inform them of the bank's loan programs and underwriting guidelines as well as engages affordable housing agencies to identify grant and special programs to assist borrowers in qualifying for a mortgage.

Commercial Lending Programs and Products

The bank generally partners with local, state, and federal groups to enhance its own loan programs for the benefit of small business borrowers. These resources afford borrowers lower down payments, longer terms/amortizations, and interest rate subsidies. Specific loan products that the bank participates in are listed below.

The bank has a commercial lending relationship with Pursuit Lending (formally known as The New York State Business Development Corporation) and various local development corporations. The program helps develop skills of small to medium businesses by offering counseling. The bank provided \$1.4 million to assist with their funding needs.

The bank participated with various local development agencies, including the Madison County Industrial Development Agency (IDA) and the Greater Syracuse Business Development Corp to finance loans bonded by them. During the evaluation period, the bank originated 25 loans for \$19.6 million with these programs.

The bank participates with the SBA loan program which helps reduce the bank's risk with government guarantees that allow the bank to finance small businesses. During the evaluation period, the bank originated 45 loans for \$6.4 million.

The bank participates with The New York State "Linked Deposit" program through the New York State Short Term Investment Pool, which allows lenders to offer a reduced rate to businesses that meet criteria set by the state for business development and additional employees. During the evaluation period, the bank originated seven loans for \$2.8 million.

The bank participates with the FSA to provide lenders with a guarantee of up to 95 percent of the loss of principal and interest on a loan. Farmers and ranchers apply to an agricultural lender, which then arranges for the guarantee. The FSA guarantee permits lenders to make agricultural credit available to farmers who do not meet the lender's normal underwriting criteria. During the evaluation period, the bank originated six loans for \$2.2 million.

Small Business Lending Programs

The bank participates in the Wheels to Work Program, sponsored by Seneca and Otsego Counties. The Wheels to Work is a transportation assistance program designed to support income eligible households in acquiring safe, reliable transportation so adults may commute to and from work. The program helps low-income adults to acquire employment and keep working, by coordinating the purchase of affordable/used vehicles, offering financial assistance for vehicle repairs, and general financial management skills. The bank makes car loans to low- to moderate-income individuals qualified under the program to facilitate their employability by facilitating transportation (regardless of financial capacity).

Retail Banking Services

CBNA offers traditional retail services that are consistent throughout its AAs. The bank's retail products include free checking accounts and savings accounts. This includes the Simply Checking account, which requires no minimum balance and does not charge service or overdraft fees. The bank offers free online and mobile banking, mobile deposits, bill pay, e-statements, and return check images. These accounts also give customers access to Zelle, Apple Pay, and Android Pay. Retail products also include a secured credit card through a relationship with the First National Bank of Omaha that allows customers to build credit and allows customers to pay their card within the branch network.

CBNA offers services to provide access to funds for low- to moderate-income individuals who receive government assistance. All branches will cash government checks for customers and non-customers, although a nominal fee applies to cashing non-federal government or income tax refund checks for non-customers. Fees never apply when cashing a federal government check. In addition, customers and non-customers can withdraw state of New York public assistance through the Electronic Benefits Transfer Program using a CBNA automated teller machine (ATM) free of charge.

Alternative delivery systems included services such as telephone banking in English and Spanish, online banking, and mobile banking with mobile deposit. The bank performed a study in 2024 on online and mobile banking penetration to demonstrate the effectiveness in helping meet the needs of low- and moderate-income individuals or communities. The mapping demonstrated reasonable penetration in low- and moderate-income geographies throughout the AAs.

Broader Statewide or Regional Area

In addition to the community development (CD) investments made within the bank's AAs, the bank also made 10 broader statewide and regional area investments totaling \$11 million during the evaluation period. Investments included federal and state tax credits and investments in small business community loan funds for various states.

Lending in Assessment Area

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

The bank originated and purchased 93.4 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	15,533	94.0	1,000	6.1	16,533	2,399,943	87.6	338,963	12.4	2,738,906
Small Business	3,535	91.4	331	8.6	3,866	599,371	85.5	102,667	14.6	702,038
Small Farm	542	92.3	45	7.7	587	53,338	94.0	3,420	6.0	56,758
Total	19,610	93.4	1,376	6.6	20,986	3,052,652	87.3	445,050	12.7	3,497,702

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

Description of Institution

CBNA is a full-service interstate bank headquartered in Canton, NY and operates in New York, Pennsylvania, Massachusetts, and Vermont. CBNA executive offices are located in DeWitt, NY, a suburb of Syracuse, NY. CBNA is a wholly owned subsidiary of Community Financial Services, Inc. (CFSI), a one-bank holding company. CFSI is also the sole owner of Benefit Plans Administrative Services (BPAS), Inc., a retirement and benefits plan administration and consulting firm with several subsidiaries. CFSI had total assets of \$16.1 billion as of December 31, 2024.

CBNA's operating subsidiaries had no impact on the bank's capacity to lend in the AAs where it operates. The bank's operating subsidiaries include the following: The Carta Group, Inc. (Carta Group), CBNA Preferred Funding Corporation (PFC), CBNA Treasury Management Corporation (TMC), Community Investment Services, Inc. (CISI), Nottingham Advisors, Inc. (Nottingham), OneGroup NY, Inc. (OneGroup), OneGroup Wealth Partners, Inc. (Wealth Partners), and Oneida Preferred Funding II LLC (OPFC II). OneGroup is a full-service insurance agency offering personal and commercial lines of insurance and other risk management products and services. PFC and OPFC II primarily act as investors in residential and commercial real estate activities. TMC provides cash management, investment, and treasury services to the bank. CISI, Carta Group, and Wealth Partners provide broker-dealer and investment advisory services. Nottingham provides asset management services to individuals, corporations, corporate pension and profit-sharing plans, and foundations.

CBNA is one of the largest community banks headquartered in Upstate New York. As of December 31, 2024, CBNA had 186 full-service branches serving 62 counties spanning Upstate New York, Northeastern Pennsylvania, Vermont, and Western Massachusetts. CBNA has 12 AAs in New York, three AAs in Pennsylvania, two AAs in Vermont, and one AA in Massachusetts. The bank operates principally in smaller rural towns, villages, and cities within its market area. CBNA's primary business focus and strategy is consistent across all states and includes growing the retail line of business, mainly home mortgage lending and retail deposit products and services, as well as expanding the commercial line of business through small business and small farm lending and commercial deposit products and services. In 2023, the bank identified de novo locations that will result in greater distribution of retail branches located in low- and moderate-income census tracts.

Since the prior CRA evaluation in August 2022, CBNA continued to expand its operations in Upstate New York through acquisitions. In May 2022, CBNA acquired Elmira Savings Bank with \$650 million in total assets. Elmira Savings Bank was a New York State chartered savings bank headquartered in Elmira, New York. The acquisition added eight branch locations across a five-county area in the central New York and southern New York markets.

As of December 31, 2024, CBNA had \$16.1 billion in total assets that included \$10.4 billion in total loans, representing 64.7 percent of total assets. The bank's loan mix consisted of 39.23 percent residential real estate loans, 21.1 percent commercial real estate loans, 19.0 percent consumer loans, 8.1 percent in commercial loans (includes small business loans), 7.0 percent in multifamily real estate loans, 4.3 percent in construction and development loans, and 1.3 percent in other loans and leases. As of December 31, 2024, CBNA reported tier 1 capital of \$1.2 billion.

CBNA is not subject to any known financial, legal, or regulatory restrictions that would impede its ability to help meet the credit needs of its AAs.

CBNA's prior performance evaluation dated August 1, 2022, resulted in a Satisfactory rating based on a High Satisfactory rating for the Investment Test, and Low Satisfactory ratings for the Lending Test and Service Test.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's performance was assessed using home mortgage, small business, and small loans to farms originated and purchased during the evaluation period, which was January 1, 2022, through December 31, 2024.

For the Lending Test, there are two analysis periods considered for this evaluation when analyzing geographical and borrower distribution of loans for Massachusetts and New York. The split analysis periods are due to updates to the 2020 U.S. Census. The updates to the Census information changes the demographic and aggregate comparators for geographic and borrower distribution of loans, thus split analysis periods are needed to accurately assess performance in these two Lending Test components. The analysis periods for geographical and borrower distribution of loans are January 1, 2022, through December 31, 2023, and January 1, 2024, through December 31, 2024. Performance Tables 7, 8, 9, and 10 in appendix D reflect data covered by the split analysis periods. Performance also included an assessment of CD activities over the same period, including CD loans and services and qualified investments, grants, and donations.

Lending performance was assessed based on the bank's home mortgage loans, small loans to businesses, and small loans to farms. The bank's business strategy is focused on expanding its home mortgage and small business lending. Those represent the primary loan products for the bank and are given the most consideration in our conclusions on lending performance. At least 20 loans must be originated and/or purchased in an AA during the evaluation period for an analysis to be meaningful. The bank had sufficient volume of small farm loans for analysis to be meaningful in the state of New York for two of the full-scope AAs. Small farm lending performance is not analyzed in the other rating areas. In those areas with minimal loan volume, small farm lending is not given much consideration in concluding on lending performance; Home Mortgage Disclosure Act (HMDA) and small business and small farm aggregate lending, as well as market share percentages consider only lenders that submit HMDA and small business and small farm data. Lenders that collect but do not submit data are not considered in the percentages.

Management provided HMDA-reported home mortgage loan information for 2022, 2023, and 2024 and CRA-reported small business loan information for 2022, 2023, and 2024. Consumer lending does not represent a substantial part of the bank's lending and bank management did not collect or submit any consumer loan data for consideration. OCC examiners determined the data submitted as required by HMDA and CRA was reliable and accurate. In addition, the OCC verified the management-submitted CD activity data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office or a deposit-taking ATM, 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 metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or

combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated Non MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating 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.

Ratings

The bank’s overall rating is a blend of the state ratings.

CBNA operates in four states, Massachusetts, New York, Pennsylvania, and Vermont. The bank’s presence is largest in the state of New York rating area. The New York rating area received the most consideration in concluding on the bank’s CRA performance because it represented 77.4 percent of total deposits, 80.5 percent of loan volume (by number of home mortgages, small business, and small farm loans), and 72.1 percent of branches. In addition, 12 of the 18 AAs are in the state of New York. The bank’s presence in the states of Pennsylvania and Vermont rating areas was comparable and received similar levels of consideration in our conclusions on the bank’s CRA performance. Pennsylvania had three AAs and represented 11.3 percent of total deposits, 12.2 percent of loans by number, and 12.7 percent of branches. Vermont had 11.0 percent of total deposits, 7.0 percent of loans by number and 14.7 percent of branches. Massachusetts received the least consideration because of the bank’s limited physical presence, deposit market share, and number of loans.

The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State Rating section for details regarding how AAs were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), in determining a national 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 Massachusetts

CRA rating for the State of Massachusetts: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the credit needs in the AA.
- The geographic distribution of loans in the AA is excellent.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses of different sizes is adequate.
- The institution made an adequate level of CD loans.
- The use of innovative and flexible loan products contributed positively to the bank's performance.
- The bank has an excellent level of qualified investments but through passive investments.
- The bank's delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in Massachusetts

CBNA had one AA within the state of Massachusetts consisting of the Springfield, MA MSA (MSA #44140) AA (Springfield MA MSA AA). The AA consisted of 95 contiguous tracks in a portion of Hampden County centered in the city of Springfield. As of December 31, 2024, CBNA operated one full-service branch equipped with an ATM. The single branch, in a low-income census tract, represented 0.5 percent of the bank's total branch network.

CBNA's strategy during the evaluation period emphasized organic loan and deposit growth as well as increased brand awareness due to the bank's small presence in the market and state overall. CBNA's business activities include commercial banking, retail banking, and wealth management services. Home mortgage loans accounted for 55.8 percent of loans (based on total home mortgage and small business loans) originated or purchased in Massachusetts during the evaluation period.

The bank faces strong competition for deposits and loans in the AA. As of June 30, 2024, CBNA's total dollar volume of deposits in Massachusetts was \$39.6 million and represented 0.3 percent of total bank deposits. According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank ranked 16th out of 18 institutions operating in Hampden County with a 0.3 percent market share of deposits. Major

competitors include Bank of America, N. A., TD Bank, N. A., Peoples Bank, Westfield Bank, and Berkshire Bank. During the evaluation period, CBNA originated and purchased 0.3 percent of its total home mortgage and 0.9 percent of its small business loans in the Springfield MA MSA AA.

Economic Data

According to January 2025 Moody's Analytics data, the Springfield MA MSA AA was in the "at risk" stage of the business cycle with employment growth slower than before the pandemic. Springfield added jobs more slowly than regionally and nationally due to below average gains in healthcare industry and losses in finance, manufacturing, and construction. The unemployment rate is higher than nationally because the labor force is growing faster than job creation. The healthcare industry is anticipated to add jobs faster due to its aging population in the AA, but it is anticipated to be limited to weak population growth. Population growth is expected to be minimal in Springfield with continued out-migration of skilled youth coupled with slowed international immigration.

According to the U.S. Bureau of Labor Statistics (BLS) December 2024 data, the unemployment rate (not seasonally adjusted) in the Springfield MA MSA was 5.0 percent, which was higher than the state unemployment rate of 4.1 percent. During the evaluation period, unemployment ranged from a low of 3.6 percent in April 2023 to a high of 5.9 percent in July 2024. Generally, the unemployment rate trailed the state's unemployment rate throughout the evaluation period. Per Moody's Analytics, top employers in the Springfield MA MSA were Baystate Health, MassMutual Financial Group, and General Dynamics Advanced Infor Systems. Education and health services, government and retail trade compose the top employment industries.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts conducted during the evaluation period within the Springfield MA MSA AA to determine local economic conditions and community needs. Community contacts cited opportunities for investing in and funding first-time homebuyer programs and providing financial education to the local community as priorities in the AA. In addition, the high cost of housing and a limited supply of affordable housing in the AA were secondary issues. The contacts noted the income and sale costs plus higher interest rates have priced people out of buying new homes.

Springfield MA MSA AA

Springfield MA MSA 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	17.9	28.4	27.4	24.2	2.1
Population by Geography	430,184	13.3	29.2	28.3	28.4	0.8
Housing Units by Geography	176,988	12.9	30.7	28.7	27.3	0.4
Owner-Occupied Housing by Geography	99,076	3.5	22.1	34.1	40.3	0.0
Occupied Rental Units by Geography	66,765	25.3	42.1	21.9	9.8	0.9
Vacant Units by Geography	11,147	22.8	38.8	20.7	16.6	1.2
Businesses by Geography	13,867	14.9	28.8	24.6	31.0	0.8
Farms by Geography	387	3.4	16.8	26.1	52.7	1.0
Family Distribution by Income Level	105,482	27.2	17.0	18.1	37.7	0.0
Household Distribution by Income Level	165,841	28.9	15.6	16.3	39.2	0.0
Unemployment rate (%)	6.3	13.0	7.8	5.8	3.2	3.0
Households Below Poverty Level (%)	16.8	44.8	20.5	11.3	6.0	30.8
Median Family Income (44140 - Springfield, MA MSA)		\$79,907		Median Housing Value		\$187,200
Median Family Income (44140 - Springfield, MA MSA) for 2023		\$94,600		Median Gross Rent		\$916
				Families Below Poverty Level		12.1

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

Springfield MA MSA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	15.8	24.2	32.6	25.3	2.1
Population by Geography	430,184	11.5	24.9	32.7	30.2	0.8
Housing Units by Geography	176,988	11.4	25.3	33.8	29.1	0.4
Owner-Occupied Housing by Geography	99,076	2.7	17.7	37.1	42.5	0.0
Occupied Rental Units by Geography	66,765	23.1	35.3	29.9	10.9	0.9
Vacant Units by Geography	11,147	19.2	32.6	28.4	18.6	1.2
Businesses by Geography	13,309	13.4	22.8	29.9	33.1	0.7
Farms by Geography	374	3.2	12.3	28.1	55.4	1.1
Family Distribution by Income Level	105,482	25.1	16.3	17.5	41.1	0.0
Household Distribution by Income Level	165,841	27.2	15.1	15.8	42.0	0.0
Unemployment rate (%)	6.3	13.1	8.5	5.8	3.5	3.0
Households Below Poverty Level (%)	16.8	46.3	22.5	12.2	6.2	30.8
Median Family Income (44140 - Springfield, MA MSA)		\$74,547		Median Housing Value		\$187,200
Median Family Income (44140 - Springfield, MA MSA) for 2024		\$89,100		Median Gross Rent		\$916
				Families Below Poverty Level		12.1

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

Scope of Evaluation in Massachusetts

The OCC conducted a full-scope review of the Springfield MA MSA AA, CBNA's only AA in the state of Massachusetts. Home mortgage loans, which accounted for 55.8 percent of loans made in the AA during the evaluation period, were given more weight than small business loans. CBNA did not originate or purchase any small farms loans in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the state of Massachusetts was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2022-2024	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Springfield MA MSA	43	34	0	1	0	78	96.3	100.0	
Statewide	-	-	-	3	0	3	3.7	-	
Total	43	34	0	4	0	81	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Springfield MA MSA	9,714	10,932	0	20	0	20,666	81.1	100.0	
Statewide	-	-	-	4,816	0	4,816	18.9	-	
Total	9,714	10,932	0	4,836	0	25,482	100.0	100.0	
Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%									

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

Lending levels reflect good responsiveness to the Springfield MA MSA AA credit needs. The bank's percentile rank for both loan products is close to the bank's deposit percentile rank. Market share for the bank's primary product in the AA, home mortgage loans, was similar to the bank's deposit market share. During the evaluation period, CBNA originated and purchased 0.3 percent of its total home mortgage and 0.9 percent of its small business loans in the Springfield AA.

In 2024, the bank originated a minimal number (less than 20) of home mortgage (16) and small business (6) loans and an analysis of loans for the respective product type is not meaningful. Therefore, conclusions for the distribution of loans by income level of the geography and distribution of loans by the income level of the borrower will only be performed on loans from 2022 and 2023.

Based on the 2023 HMDA market share data, CBNA ranked 76th out of 305 lending institutions with a 0.2 percent market share, demonstrating good responsiveness to credit needs. Relative to its competition, the bank's market share rank for home mortgage lending is stronger than the market share rank for deposits. The bank's rank for home mortgage lending places it in the top 25th percentile for home mortgage lending, relative to the level of competition. The top five mortgage lenders on the market included Westfield Bank, Peoples Bank, Movement Mortgage LLC, Rocket Mortgage, and PennyMac Loan Services LLC and had a combined total market share of 21.7 percent.

Based on the 2023 CRA small business loan data, the bank ranked 45th out of 95 lending institutions with a 0.2 percent market share, demonstrating good responsiveness to credit needs. The top five lenders in the market, American Express National Bank, JP Morgan Chase Bank, Citi Bank, Capital One, and Bank of America, had a combined market share of 61.7 percent.

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 Massachusetts 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 is excellent for the 2022-2023 analysis period. The geographic distribution of home mortgage loans in both low- and moderate-income census tracts significantly exceeded both the percentage of owner-occupied housing and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table 9 in the state of Massachusetts 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 is excellent for the 2022-2023 analysis period. Geographic distribution of small loans to businesses in low-income census tracts exceeded the percentage of businesses located in low-income census tracts and aggregate lending in the AA. Geographic distribution of small loans to businesses in moderate-income tracts significantly exceeded the percentage of businesses located in moderate-income census tracts and aggregate lending in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CBNA's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous 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 business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Massachusetts 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 is adequate. The bank did not make any home mortgage loans to low-income families in the AA representing 27.2 percent of the population; competitors made home mortgage loans to 8.4 percent of low-income families. However, home mortgage lending to moderate-income borrowers exceeded the number of moderate-income families and the aggregate lending to moderate-income families in the AA.

Small Loans to Businesses

Refer to Table 10 in the state of Massachusetts 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 small loans to businesses of different sizes is poor. The distribution of small loans to businesses with less than \$1 million in revenue was significantly below the number of businesses with less than \$1 million in revenue and was well below aggregate lending in the AA.

Community Development Lending

The institution 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 institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan for \$20,000, which represented 0.6 percent of allocated tier 1 capital in the AA. CBNA originated three additional loans totaling \$4.8 million at the state level, which support affordable housing in the greater regional area and represented 133.7 percent of allocated tier 1 capital. Consideration was given to these loans as CBNA was responsive to the CD needs and opportunities of its AA.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank offers several lending programs that are available in all AAs, which include affordable homeownership grant programs, USDA housing loans, NCC mortgages, FNMA HomeReady Mortgages, FHLB HDP loans, VA loans, and a bank specific special purpose credit mortgage program. Additionally, the bank offers innovative small business lending programs, which include SBA loan programs, USDA Farm Service loans, and several customized lending programs that are focused on small and medium sized businesses.

INVESTMENT TEST

The bank’s performance under the Investment Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Springfield MA MSA AA was good. The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited adequate responsiveness to credit and CD needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Springfield MA MSA	0	0	60	18,104	60	100.0	18,104	100.0	0	0

During the evaluation period, the bank purchased 55 mortgage-backed securities (MBS) totaling \$18.1 million where underlying mortgage borrowers were low- or moderate-income individuals located in the AA. Additionally, the bank made five donations totaling \$9,750 to a local youth community group that provides meals and mentorship to low- and moderate-income children. These CD investments represented over 500 percent of tier 1 capital allocated to the AA.

SERVICE TEST

The bank’s performance under the Service Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Springfield MA MSA AA was good.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution’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
Springfield MA MSA	100.0	1	100.0	100.0	0.0	0.0	0.0	0.0	13.3	29.2	28.3	28.4	0.8

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

Due to rounding, totals may not equal 100.0%

As of December 31, 2024, CBNA operated one branch in the Springfield MA MSA AA. The bank operated the sole branch in a low-income census tract bordering four other low-income census tracts and two moderate-income census tracts. The branch was a full-service branch with a deposit-taking ATM. The bank did not open or close any branches in the AA during the evaluation period.

Services, including business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The branch is open from 9:00 a.m. until 4:30 p.m., Monday through Thursday, with extended lobby hours on Friday until 5:00 p.m. While there are no Saturday hours, business hours are longer than most other banks in the general vicinity of the branch. In addition, the branch is in the downtown business district, which has little activity on the weekends to justify opening the branch.

Community Development Services

The institution provided an adequate level of CD services. The assessment of performance considered the bank's small presence in the AA. The bank had two employees volunteer a total of 167 hours during the evaluation period to five organizations. The organizations provide CD services by providing financial literacy training to new homebuyers and community service activities targeting low- and moderate-income youth.

State of New York

CRA rating for the State of New York: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans in the AA is excellent.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses and farms of different sizes is good.
- The bank is a leader in CD lending, and it further supports the conclusion of excellent performance on the lending test.
- The use of innovative and flexible loan products contributed positively to the bank's performance.
- The bank has an excellent level of qualified investments but through passive investments.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in New York

CBNA has 12 AAs within the state of New York consisting of the New York Non MSA AA (NY Non MSA AA), the Albany-Schenectady-Troy, NY MSA AA (Albany-Schenectady-Troy NY MSA AA) (MSA #10580), Binghamton, NY MSA AA (Binghamton NY MSA AA) (MSA #13780), Buffalo-Cheektowaga, NY MSA AA (Buffalo-Cheektowaga NY MSA AA) (MSA #15380), Elmira, NY MSA AA (Elmira NY MSA AA) (MSA #21300), Glens Falls, NY MSA AA (Glens Falls NY MSA AA) (MSA #24020), Ithaca, NY MSA AA (Ithaca NY MSA AA) (MSA #27060), Kingston, NY MSA AA (Kingston NY MSA AA) (MSA #28740), Rochester, NY MSA AA (Rochester NY MSA AA) (MSA #40380), Syracuse, NY MSA AA (Syracuse NY MSA AA) (MSA #45060), Utica-Rome, NY MSA AA (Utica-Rome NY MSA AA) (MSA #46540), and Watertown-Fort Drum, NY MSA AA (Watertown-Fort Drum NY MSA AA) (MSA #48060). The 12 AAs are contiguous and cover most of Upstate New York.

The Albany-Schenectady-Troy NY MSA AA consists of three of the five counties in the MSA—Albany, Rensselaer, and Schoharie counties. The bank excluded the other two counties in the MSA from its AA as the bank does not have a physical presence in either county. The Binghamton NY MSA AA consists of the whole of Tioga County and part of Broome County, the two counties making up the MSA. The bank takes the 41 central and westernmost census tracts of the 55 census tracts in Broome County as the bank's physical presence does not extend to the easternmost portion of the county. The

Binghamton NY MSA AA consists of entire townships in Broome County. The Buffalo-Cheektowaga NY MSA AA consists of Erie County, one of the two counties composing the MSA. The bank excludes Niagara County from its AA as the bank does not have a physical presence in the county.

The Elmira NY MSA AA consists of the whole of Chemung County, the only county in the MSA. The Glens Falls NY MSA AA consists of parts of the two counties in the MSA, Warren and Washington. The Ithaca NY MSA AA consists of Tompkins County, the only county in the MSA. The Kingston NY MSA AA consists of part of Ulster County, the only county in the MSA.

For analytical purposes, the OCC combined the 21 counties not located in MSAs within the state of New York to form the NY Non MSA AA. The counties in the NY Non MSA AA include the 19 whole counties of Allegany, Cattaraugus, Cayuga, Chautauqua, Chenango, Clinton, Columbia, Delaware, Essex, Franklin, Fulton, Lewis, Montgomery, Otsego, Schuyler, Seneca, Steuben, St. Lawrence, and Yates and partial counties of Hamilton and Wyoming.

The Rochester NY MSA AA consists of four of the five counties located in the MSA—Livingston, Monroe, Ontario, and Wayne counties. It should be noted that Yates County was removed from the MSA effective first quarter of 2024. The bank excluded Orleans County from its AA as the bank does not have a physical presence in the county. The Syracuse NY MSA AA consists of the three counties in the MSA—Madison, Onondaga, and Oswego.

The Utica-Rome NY MSA consists of the Oneida County and part of Herkimer County, the two counties composing the MSA. The three census tracts in Herkimer County are in the southernmost portion of the county, where the bank has its physical presence. The AA in Herkimer County consists of entire townships. The Watertown-Fort Drum NY MSA AA consists of Jefferson County.

CBNA's strategy during the evaluation period emphasized organic loan and deposit growth, but the bank's strategy included an acquisition of the Elmira Savings Bank, which had branches in several NY AAs.

As of December 31, 2024, CBNA operated 142 branches, including seven standalone drive-up windows, in the state of New York, which represents 72.1 percent of the bank's total branch network. The bank also operated 133 deposit-taking ATMs, one of which were separate from a branch. As of June 30, 2024, CBNA's total dollar volume of deposits in the state of New York was \$10.3 billion.

CBNA originated and purchased 81.2 percent of its total home mortgages, 74.9 percent of its small business loans, and 96.5 percent of its total small farm loans in the state of New York AAs during the evaluation period.

Buffalo-Cheektowaga NY MSA AA

As of December 31, 2021, CBNA operated three branches equipped with deposit-taking ATMs in the Buffalo-Cheektowaga NY MSA AA. None of the branches were in low- or moderate-income census tracts. The five branches accounted for 1.5 percent of the bank-wide branch network and 2.1 percent of the bank's branches in New York.

The bank faced strong competition for deposits in the Buffalo-Cheektowaga NY MSA AA. CBNA reported \$246.2 million in deposits in the AA, which represented 2.4 percent of deposits in the state of New York and 1.9 percent of the bank's total deposits. According to the FDIC Deposit Market Share

Report as of June 30, 2024, CBNA ranked 12th out of 18 depository institutions with a deposit market share of 0.4 percent. The bank's top competitors for deposit market share include M&T Bank with 64.3 percent, KeyBank, N.A. with 10.3 percent, HSBC Bank USA, N.A., with 6.6 percent, and Bank of America, N.A. with 4.9 percent.

Home loans accounted for 80.4 percent of loans (based on home mortgage loans, small business loans, and small farm loans) originated in the AA. Small business loans accounted for 16.7 percent of loans, and small farm loans accounted for 2.9 percent of loans in the AA.

Economic Data

According to the May 2025 Moody's Analytics report, the Buffalo-Cheektowaga, NY MSA was in the at-risk phase of the business cycle as the payroll declines and the labor force shows minimal progress. The economic decline coupled with the cold climate contributed to the long-term population losses. Additionally, the lack of Canadian visitors has impacted Buffalo as it has a higher reliance on tourism than an average metro area. Sectors impacted include hotels, restaurants, and retail sales as cross-border shoppers are a major contributor.

According to the U.S. BLS December 2024 data, the unemployment rate (not seasonally adjusted) in the Buffalo-Cheektowaga, NY MSA was 3.9 percent, which outperformed the state unemployment rate of 4.4 percent. During the evaluation period, unemployment in the MSA ranged from a low of 2.9 percent in April 2023 to a high of 4.7 percent in February 2024. In the same timeframe, the unemployment rate in the MSA was generally lower than the state's unemployment rate. Per Moody's Analytics, the key sectors of the economy include education and health services, government, professional and business services, retail trade, and leisure and hospitality services. Top employers in the Buffalo-Cheektowaga, NY MSA were Kaleida Health, M&T Bank, Catholic Health System, and the University at Buffalo.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one listening session conducted with local community organizations during the evaluation period within the Buffalo-Cheektowaga NY MSA AA to determine local economic conditions and community needs. The listening session indicated the need for technical assistance for small businesses including financial expertise, financial literacy training, and more low- and moderate-income access to financial institutions.

Buffalo-Cheektowaga NY MSA 2022-2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	261	15.3	17.6	39.1	24.1	3.8
Population by Geography	954,236	12.5	15.3	40.1	30.0	1.8
Housing Units by Geography	429,708	12.3	16.3	42.4	28.4	0.7
Owner-Occupied Housing by Geography	254,697	5.8	12.1	46.4	35.2	0.5
Occupied Rental Units by Geography	138,213	20.4	22.5	37.0	19.0	1.1
Vacant Units by Geography	36,798	26.1	22.2	34.1	16.5	1.1
Businesses by Geography	33,564	8.8	13.1	41.6	34.0	2.6
Farms by Geography	1,038	4.1	8.7	46.6	39.9	0.8
Family Distribution by Income Level	228,440	22.3	16.3	20.6	40.9	0.0
Household Distribution by Income Level	392,910	25.4	15.2	16.9	42.5	0.0
Unemployment rate (%)	4.8	11.5	6.2	3.9	3.4	8.2
Households Below Poverty Level (%)	13.7	37.9	21.4	9.7	6.3	18.7
Median Family Income (15380 - Buffalo-Cheektowaga, NY MSA)		\$79,486	Median Housing Value			\$141,100
Median Family Income (15380 - Buffalo-Cheektowaga, NY MSA) for 2023		\$93,900	Median Gross Rent			\$820
			Families Below Poverty Level			9.6
<small>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</small>						

Buffalo-Cheektowaga NY MSA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	261	15.3	17.6	39.1	24.1	3.8
Population by Geography	954,236	12.5	15.3	40.5	29.9	1.8
Housing Units by Geography	429,708	12.3	16.3	42.4	28.4	0.7
Owner-Occupied Housing by Geography	254,697	5.8	12.1	46.4	35.2	0.5
Occupied Rental Units by Geography	138,213	20.4	22.5	37.0	19.0	1.1
Vacant Units by Geography	36,798	26.1	22.2	34.1	16.5	1.1
Businesses by Geography	34,529	9.3	13.4	41.4	33.4	2.5
Farms by Geography	1,105	4.9	9.1	46.6	38.8	0.5
Family Distribution by Income Level	228,440	22.3	16.3	20.6	40.8	0.0
Household Distribution by Income Level	392,910	25.4	15.2	16.9	42.5	0.0
Unemployment rate (%)	4.8	11.5	6.2	3.9	3.4	8.2
Households Below Poverty Level (%)	13.7	37.9	21.4	9.7	6.3	18.7
Median Family Income (15380 - Buffalo-Cheektowaga, NY MSA)		\$79,486	Median Housing Value			\$141,100
Median Family Income (15380 - Buffalo-Cheektowaga, NY MSA) for 2024		\$96,900	Median Gross Rent			\$820
			Families Below Poverty Level			9.6
<small>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</small>						

NY Non MSA AA

CBNA operated 79 branches, including five standalone drive-ups, in the NY Non MSA AA. In addition, the bank operated 74 deposit-taking ATMs in the AA, none of which were separate from a branch. The NY Non MSA AA spans 20 counties covering most of Upstate New York outside of MSAs. Two of the branches are in low-income census tracts with one in Cattaraugus County and the other in Chautauqua County. Thirteen of the branches are in moderate-income census tracts with one in Chautauqua County, two in St. Lawrence County, one in Lewis County, two in Franklin County, one in Yates County, one in Clinton County, one in Cattaraugus County, two in Essex County, one in Delaware County, and one in Schuyler County.

The bank faced moderate competition in the NY Non MSA AA. According to the FDIC Deposit Market Share Report as of June 30, 2024, CBNA reported \$6.2 billion in deposits in the AA, representing 46.56 percent of the bank's total deposits. CBNA ranked first out of 40 depository institutions with a deposit market share of 26.4 percent. The bank's top competitors for deposit market share include NBT Bank, N.A. with 16.1 percent, Five Star Bank with 12.2 percent, and KeyBank, N.A. with 11.5 percent.

Home loans accounted for 82.2 percent of loans (based on home mortgage loans, small business loans, and small farm loans) originated in the AA. Small business loans accounted for 14.6 percent of loans, and small farm loans accounted for 3.2 percent of loans in the AA.

Economic Data

The NY Non MSA AA includes whole or parts of counties in parts of the Capital, Central, Finger Lakes, Mohawk Valley, North Country, Southern Tier, and Western regions of the state of New York. Parts of the Capital, Mohawk, and North Country regions make up Adirondack Park, which spans six million acres consisting of state- and privately-owned lands that have tight controls on land usage. Key economic drivers of the Adirondack Park include forestry, agriculture, hospitality, healthcare, and education. CBNA has a presence in all but one county that make up the Adirondack Park.

The other regions are primarily rural with small towns and a few more heavily populated areas spread throughout each county. Throughout the other regions key economic drivers are consistent and include forestry, agriculture, hospitality, recreation, healthcare, and education.

According to December 2024 U.S. BLS data, unemployment rates (not seasonally adjusted) in the AA ranged from a low of 2.9 percent in Columbia County to a high of 6.1 percent in Hamilton County. All counties in the AA had lower unemployment rates than the state of New York's 4.4 percent with the exceptions of Schuyler County, St. Lawrence County, and Hamilton County.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from four community contacts conducted during the evaluation period within the NY Non MSA AA to determine local economic conditions and community needs. The community contacts were several different community organizations that served nearly every part of the NY Non MSA AA footprint. One contact was a not-for-profit community action agency that serves low- and moderate-income residents. The contact noted a need for economic development that would make jobs available in the area, affordable housing, healthcare, childcare, youth development programs, and transportation services. The other community contacts reviewed by the OCC were similar types of organizations across the AA and identified similar community needs.

NY Non MSA 2022-2023						
2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	358	1.1	16.5	65.1	14.6	3.1
Population by Geography	1,103,292	1.3	16.1	66.6	15.1	1.0
Housing Units by Geography	592,379	1.2	15.5	69.3	13.8	0.2
Owner-Occupied Housing by Geography	325,319	0.4	13.4	70.4	15.7	0.1
Occupied Rental Units by Geography	125,924	3.8	23.3	60.3	12.3	0.4
Vacant Units by Geography	141,136	0.8	13.4	74.8	10.9	0.2
Businesses by Geography	32,354	2.2	15.0	64.4	18.0	0.5
Farms by Geography	2,872	0.2	9.7	73.7	16.3	0.1
Family Distribution by Income Level	281,855	21.4	18.0	20.9	39.7	0.0
Household Distribution by Income Level	451,243	24.8	16.2	17.9	41.1	0.0
Unemployment rate (%)	5.4	5.8	6.9	5.1	5.2	12.7
Households Below Poverty Level (%)	14.1	32.4	21.3	12.9	9.5	35.2
Median Family Income (Non MSAs - NY)		\$69,021			Median Housing Value	\$112,100
Median Family Income (Non MSAs - NY) for 2023		\$83,700			Median Gross Rent	\$745
					Families Below Poverty Level	10.0

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

NY Non MSA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	358	1.1	15.9	65.4	14.5	3.1
Population by Geography	1,103,292	1.3	15.4	67.0	15.3	1.0
Housing Units by Geography	592,379	1.2	14.9	69.7	14.0	0.2
Owner-Occupied Housing by Geography	325,319	0.4	12.8	70.8	15.9	0.1
Occupied Rental Units by Geography	125,924	3.8	22.4	61.1	12.4	0.4
Vacant Units by Geography	141,136	0.8	13.0	75.0	11.1	0.2
Businesses by Geography	32,858	2.1	14.6	64.5	18.3	0.5
Farms by Geography	2,933	0.2	9.5	73.6	16.6	0.1
Family Distribution by Income Level	281,855	21.3	17.9	20.9	40.0	0.0
Household Distribution by Income Level	451,243	24.7	16.2	17.9	41.2	0.0
Unemployment rate (%)	5.4	5.8	6.9	5.1	5.2	12.7
Households Below Poverty Level (%)	14.1	32.4	21.3	13.0	9.5	35.2
Median Family Income (Non MSAs - NY)		\$68,606			Median Housing Value	\$112,100
Median Family Income (Non MSAs - NY) for 2023		\$83,800			Median Gross Rent	\$745
					Families Below Poverty Level	10.0

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

Rochester NY MSA AA

CBNA operated 12 branches in the Rochester NY MSA AA. None of the branches were in low-income census tracts. Four of the branches were in moderate-income census tracts, including two in Ontario County, one in Wayne County, and one in Monroe County. The 12 branches accounted for 6.1 percent of the bank's overall branch network and 8.5 percent of branches in the state of New York.

The bank faced strong competition for deposits in the AA. According to the FDIC Deposit Market Share Report as of June 30, 2024, CBNA reported \$848.7 million in deposits in the Rochester NY MSA AA, representing 6.4 percent of the bank's total deposits. CBNA ranked 10th out of 18 depository institutions with a deposit market share of 3.6 percent. The bank's top competitors for deposit market share include M&T Bank with 17 percent, The Canandaigua National Bank and Trust Company with 15.7 percent, JPMorgan Chase Bank, N.A. with 14.5 percent, and KeyBank, N.A. with 14.1 percent.

Home loans accounted for 73.4 percent of loans (based on home mortgage loans, small business loans, and small farm loans) originated in the AA. Small business loans accounted for 17.5 percent of loans, and small farm loans accounted for 9.1 percent of loans in the AA.

Economic Data

According to the January 2025 Moody's Analytics report, the Rochester NY MSA AA was in the recovery phase of the business cycle. The education and healthcare industries have served as a source of stability and support to high-wage jobs in the area. Higher education has enjoyed enrollment growth despite a shrinking college-age population in the region. Hospitals support job creation in the area. The area benefits from relatively affordable housing but, like other Upstate cities, suffers from population stagnation and out-migration.

According to the U.S. BLS December 2024 data, the unemployment rate (not seasonally adjusted) in the Rochester, NY MSA was 3.4 percent, which outperformed the state unemployment rate of 4.4 percent. During the evaluation period, unemployment ranged from a low of 2.7 percent in April 2023 to a high of 4.4 percent in February 2024. The unemployment rate in the Rochester NY MSA AA consistently outperformed the state's unemployment rate during the evaluation period. Per Moody's Analytics, the key sectors of the economy include education and health services, government, professional and business services, and manufacturing. Top employers in the Rochester NY MSA AA were the University of Rochester, Rochester Regional Health System, Wegmans Food Markets, Inc, and Paychex, Inc.

Community Contacts

The OCC reviewed information from one community contact and a listening session with several community organizations during the evaluation period to determine local economic conditions and community needs. The community contact noted a need for workforce development, better access to higher-paying jobs, and housing and childcare subsidies.

Rochester NY MSA 2022-2023						
2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	303	12.9	18.5	39.9	24.4	4.3
Population by Geography	1,049,792	9.6	17.3	43.3	28.6	1.2
Housing Units by Geography	463,630	9.4	18.9	44.7	26.3	0.7
Owner-Occupied Housing by Geography	281,158	4.1	15.1	47.8	32.9	0.2
Occupied Rental Units by Geography	140,441	18.3	25.2	38.7	16.3	1.6
Vacant Units by Geography	42,031	15.5	22.9	44.9	15.5	1.1
Businesses by Geography	36,315	6.3	16.4	42.7	31.8	2.8
Farms by Geography	1,584	1.8	14.1	56.6	26.8	0.6
Family Distribution by Income Level	258,202	21.0	17.7	20.6	40.8	0.0
Household Distribution by Income Level	421,599	24.6	15.5	17.7	42.2	0.0
Unemployment rate (%)	4.9	12.0	6.4	4.1	3.1	10.1
Households Below Poverty Level (%)	12.4	37.4	16.1	9.7	5.7	41.4
Median Family Income (40380 - Rochester, NY MSA)		\$80,423			Median Housing Value	\$139,000
Median Family Income (40380 - Rochester, NY MSA) for 2023		\$97,300			Median Gross Rent	\$894
					Families Below Poverty Level	8.9
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						

Rochester NY MSA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	303	12.9	17.2	40.6	25.1	4.3
Population by Geography	1,049,792	9.6	16.2	43.4	29.7	1.2
Housing Units by Geography	463,630	9.4	17.6	45.0	27.3	0.7
Owner-Occupied Housing by Geography	281,158	4.1	13.9	48.0	33.9	0.2
Occupied Rental Units by Geography	140,441	18.3	24.5	38.6	17.0	1.6
Vacant Units by Geography	42,031	15.5	19.3	46.8	17.3	1.1
Businesses by Geography	36,729	6.5	15.7	42.4	32.9	2.6
Farms by Geography	1,614	2.2	12.5	56.8	27.8	0.7
Family Distribution by Income Level	258,202	20.5	17.4	20.4	41.7	0.0
Household Distribution by Income Level	421,599	24.6	15.5	17.8	42.2	0.0
Unemployment rate (%)	4.9	12.0	6.6	4.1	3.2	10.1
Households Below Poverty Level (%)	12.4	37.4	16.4	9.7	5.7	41.4
Median Family Income (40380 - Rochester, NY MSA)		\$79,424			Median Housing Value	\$139,000
Median Family Income (40380 - Rochester, NY MSA) for 2023		\$98,700			Median Gross Rent	\$894
					Families Below Poverty Level	8.9
FFIEC File - 2020 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						

Syracuse NY MSA AA

CBNA operated 15 branches in the Syracuse NY MSA AA. In addition, the bank operated 12 deposit-taking ATMs in the AA, including one standalone. None of the branches were in a low-income census tract, and four branches were in moderate-income census tracts, including two in Oswego County and two in Madison County.

The bank faced strong competition for deposits in the Syracuse NY MSA AA. According to the FDIC Deposit Market Share report as of June 30, 2024, CBNA's total dollar volume of deposits in the Syracuse NY MSA AA was \$1.1 billion and accounted for 8.4 percent of total bank deposits. The bank ranked sixth out of 15 depository institutions operating in the Syracuse NY MSA AA with a market share of 7.3 percent. Major competitors for deposit market share include M&T Bank with 24.2 percent, KeyBank, N.A. with 15.2 percent, JPMorgan Chase Bank, N.A. with 11.3 percent, NBT Bank, N.A. with 8.6 percent, and Bank of America, N.A. with 8.4 percent.

Home loans accounted for 83.3 percent of loans (based on home mortgage loans, small business loans, and small farm loans) originated in the AA. Small business loans accounted for 17.8 percent of loans, and small farm loans accounted for 0.9 percent of loans in the AA.

Economic Data

According to the May 2025 Moody's Analytics report, the Syracuse NY MSA AA was in the recovery phase of the business cycle. The education and healthcare industries serve as a stable source of jobs in the area. The MSA also benefits from a growing manufacturing industry with local manufacturers lined up with projects, contributing to the pool of jobs. However, the MSA continues to experience a steady outflow of young college-educated population.

According to the U.S. BLS December 2024 data, the unemployment rate (not seasonally adjusted) in the Syracuse NY MSA AA was 3.4 percent, which outperformed the state unemployment rate of 4.4 percent. During the evaluation period, unemployment ranged from a low of 2.8 percent in October 2022 to a high of 4.4 percent in February 2024. The unemployment rate in the Syracuse NY MSA AA has generally outperformed the state's unemployment rate during the evaluation period. The key sectors of the economy include education and health services, government, professional and business services, and retail trade. The top employers in the Syracuse NY MSA AA were Upstate Medical University, Walmart Inc., St. Joseph's Health, Lockheed Martin, and Syracuse University.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from a listening session conducted during the evaluation period within the Syracuse NY MSA AA to determine local economic conditions and community needs. The listening session included representatives of several local community organizations from across the AA. The contacts noted a need for affordable housing, small business lending, and transportation for the community.

Syracuse NY MSA 2022-2023						
2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	206	9.2	19.4	44.2	23.3	3.9
Population by Geography	662,057	7.4	18.1	42.9	28.3	3.3
Housing Units by Geography	296,071	7.7	19.4	45.1	25.7	2.1
Owner-Occupied Housing by Geography	176,179	2.3	15.6	49.5	32.2	0.4
Occupied Rental Units by Geography	83,726	16.9	26.6	35.6	16.2	4.6
Vacant Units by Geography	36,166	12.7	21.1	45.2	16.4	4.6
Businesses by Geography	22,253	7.0	15.1	43.3	28.4	6.3
Farms by Geography	913	2.0	14.6	53.7	29.4	0.4
Family Distribution by Income Level	160,048	21.9	17.4	20.6	40.1	0.0
Household Distribution by Income Level	259,905	24.8	15.6	17.9	41.7	0.0
Unemployment rate (%)	5.7	14.9	6.6	4.8	3.9	15.9
Households Below Poverty Level (%)	13.0	37.2	18.1	10.0	6.0	45.6
Median Family Income (45060 - Syracuse, NY MSA)		\$79,766			Median Housing Value	\$125,350
Median Family Income (45060 - Syracuse, NY MSA) for 2023		\$93,300			Median Gross Rent	\$853
					Families Below Poverty Level	10.0

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

Syracuse NY MSA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	206	9.2	19.4	44.2	23.3	3.9
Population by Geography	662,057	7.4	18.1	42.9	28.3	3.3
Housing Units by Geography	296,071	7.7	19.4	45.1	25.7	2.1
Owner-Occupied Housing by Geography	176,179	2.3	15.6	49.5	32.2	0.4
Occupied Rental Units by Geography	83,726	16.9	26.6	35.6	16.2	4.6
Vacant Units by Geography	36,166	12.7	21.1	45.2	16.4	4.6
Businesses by Geography	22,582	7.0	15.2	43.1	28.5	6.3
Farms by Geography	928	2.1	14.7	52.8	30.2	0.3
Family Distribution by Income Level	160,048	21.9	17.4	20.6	40.1	0.0
Household Distribution by Income Level	259,905	24.8	15.6	17.9	41.7	0.0
Unemployment rate (%)	5.7	14.9	6.6	4.8	3.9	15.9
Households Below Poverty Level (%)	13.0	37.2	18.1	10.0	6.0	45.6
Median Family Income (45060 - Syracuse, NY MSA)		\$79,766			Median Housing Value	\$125,350
Median Family Income (45060 - Syracuse, NY MSA) for 2024		\$94,800			Median Gross Rent	\$853
					Families Below Poverty Level	10.0

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

Scope of Evaluation in New York

The OCC conducted full-scope reviews of the Buffalo-Cheektowaga NY MSA AA, NY Non MSA AA, Rochester NY MSA AA, and Syracuse NY MSA AA. The four full-scope AAs accounted for 82.7 percent of deposits, 79.1 percent of total loans, and 76.9 percent of branches in the state of New York. The NY Non MSA AA received the greatest weight, as it represented the most deposits, total loans, and branches in the state of New York and for the entire bank. The weighting was followed by the Syracuse NY MSA, Rochester NY MSA, and Buffalo-Cheektowaga NY MSA, respectively. The OCC conducted limited-scope reviews of the Albany-Schenectady-Troy NY MSA AA, Binghamton NY MSA AA, Elmira NY MSA AA, Glens Falls NY MSA AA, Ithaca NY MSA AA, Kingston NY MSA AA, Utica-Rome NY MSA AA, and Watertown-Fort Drum NY MSA AA. Refer to appendix A for a complete description of the AAs and the list of counties reviewed.

Home mortgage loans, which accounted for 79.9 percent of total loans made in the state's AAs during the evaluation period, were given more weight than small business or small farm loans, which represented 16.8 percent and 3.3 percent of the bank's lending, respectively, in the state. The 2022-2023 analysis period received the most weight over the 2024 analysis period since it represented the largest volume of loans originated or purchased over the evaluation period. 2024 aggregate lending data was also not available for small business and small farm lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Areas Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Buffalo-Cheektowaga MSA, NY Non MSA AA, Rochester MSA, and Syracuse MSA was excellent.

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	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
<i>Full-Scope</i>								
Buffalo-Cheektowaga NY MSA	637	132	23	7	799	5.0	2.4	
NY Non MSA	7,118	1,266	278	34	8,696	54.8	60.2	
Rochester NY MSA	1,245	297	155	4	1,701	10.7	9.3	
Syracuse NY MSA	1,087	238	12	5	1,342	8.5	10.9	
<i>Limited-Scope</i>								
Albany-Schenectady-Troy NY MSA	265	210	2	8	485	3.1	1.7	
Binghamton NY MSA	258	49	12	1	320	2.0	0.7	
Elmira NY MSA	329	89	2	2	422	2.7	3.0	
Glens Falls NY MSA	65	13	2	0	80	0.5	0.8	
Ithaca NY MSA	338	13	5	1	357	2.3	0.9	
Kingston NY MSA	7	3	0	0	10	0.1	0.5	
Utica-Rome NY MSA	663	154	14	1	832	5.3	4.1	
Watertown-Fort Drum NY MSA	606	182	18	4	810	5.1	5.5	
NY Statewide	0	0	0	4	4	0.0	0.0	
Total	12,618	2,646	523	71	15,858	100.0	100.0	
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
<i>Full-Scope</i>								
Buffalo-Cheektowaga NY MSA	114,625	29,378	3,061	34,817	181,881	7.1	2.4	
NY Non MSA	881,813	176,982	25,409	29,077	1,113,281	43.4	60.2	
Rochester NY MSA	208,590	40,952	17,680	30,673	297,895	11.6	9.3	
Syracuse NY MSA	161,161	42,768	597	11,639	216,165	8.4	10.9	
<i>Limited-Scope</i>								
Albany-Schenectady-Troy NY MSA	95,563	58,021	235	26,645	180,464	7.0	1.7	
Binghamton NY MSA	33,901	7,943	1,246	4,102	47,192	1.8	0.7	
Elmira NY MSA	40,365	14,905	266	69,027	124,563	4.9	3.0	
Glens Falls NY MSA	9,104	2,013	42	0	11,159	0.4	0.8	
Ithaca NY MSA	71,390	3,287	350	3,918	78,945	3.1	0.9	
Kingston NY MSA	1,177	117	0	0	1,294	0.1	0.5	
Utica-Rome NY MSA	116,175	27,047	461	6,417	150,100	5.9	4.1	
Watertown-Fort Drum NY MSA	88,022	27,985	1,406	16,387	133,800	5.2	5.5	
NY Statewide	0	0	0	28,681	28,681	1.1	0.0	
Total	1,821,886	431,398	50,753	261,383	2,565,420	100.0	100.0	

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

Buffalo-Cheektowaga NY MSA AA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the FDIC Deposit Market Share report as of June 30, 2024, the bank had \$246.2 million in deposits in the Buffalo-Cheektowaga NY MSA AA. The bank ranked 12th out of 18 depository institutions in the AA, or the 67th percentile, with a 0.4 percent market share.

Based on 2024 home mortgage market share data, the bank ranked 19th out of 242 lending institutions, or the top eighth percentile, with 1.4 percent market share, demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders in the market, M&T Bank, United Wholesale Mortgage, CBNA, Premium Mortgage Corporation, and Rocket Mortgage, captured 40.4 percent of the market.

Based on 2023 small business loan data (2024 was not yet available), the bank ranked 28th out of 106 lending institutions, or the 26th percentile, with 0.3 percent market share, demonstrating excellent responsiveness to credit needs given the number of lenders in the AA. The five largest small business lenders captured 64.3 percent of the market.

Based on 2023 small farm loan data (2024 was not yet available), the bank ranked eighth out of 13 lending institutions, or the 62nd percentile, with 4.8 percent market share, demonstrating excellent responsiveness to credit needs. The five largest small farm lenders captured 74.2 percent of the market.

NY Non MSA AA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the FDIC Deposit Market Share report as of June 30, 2024, the bank had \$6.2 billion in deposits in the Non MSA NY AA. The bank ranked first out of 40 depository institutions in the AA with a 26.4 percent market share.

Based on 2024 home mortgage market share data, CBNA ranked first out of 339 lending institutions, with 14.2 percent market share, demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders in the market including CBNA, Rocket Mortgage, PennyMac Loan Services LLC, M&T Bank, and Homestead Funding Corp, captured 30.5 percent of the market.

Based on 2023 small business loan data (2024 was not yet available), the bank ranked eighth out of 126 lending institutions, or the sixth percentile, with 2.6 percent market share, demonstrating excellent responsiveness to credit needs. The five largest small business lenders captured 59.4 percent of the market.

Based on 2023 small farm loan data (2024 was not yet available), the bank ranked fifth out of 30 lending institutions, or the 16th percentile, with 9.1 percent market share, demonstrating excellent responsiveness to credit needs. The five largest small farm lenders, including CBNA, captured 60.4 percent of the market.

Rochester NY MSA AA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the FDIC Deposit Market Share report as of June 30, 2024, the bank had \$959.6 million in deposits in the Rochester NY MSA AA. The bank ranked ninth out of 18 depository institutions in the AA (top 50 percent) with a 4.1 percent market share.

Based on 2024 home mortgage market share data, CBNA ranked 15th out of 242 lending institutions, or the sixth percentile, with 1.7 percent market share, demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders in the market captured 46 percent of the market.

Based on 2023 small business loan data (2024 was not yet available), the bank ranked 18th out of 103 lending institutions, or the 17th percentile, with 0.6 percent market share, demonstrating good responsiveness to credit needs. The five largest small business lenders captured 65.2 percent of the market.

Based on 2023 small farm loan data (2024 was not yet available), the bank ranked fifth out of 22 lending institutions, or the 22nd percentile, with 6.6 percent market share, demonstrating excellent responsiveness to credit needs. The five largest small farm lenders captured 71.8 percent of the market.

Syracuse NY MSA AA

Lending levels reflect excellent responsiveness to AA credit needs.

According to the FDIC Deposit Market Share report as of June 30, 2024, the bank had \$1.1 billion in deposits in the Syracuse NY MSA AA. The bank ranked sixth out of 15 depository institutions in the AA, or the 40th percentile, with a 7.3 percent market share.

Based on 2024 home mortgage market share data, CBNA ranked fifth out of 242 lending institutions, or the second percentile, with 2.8 percent market share, demonstrating excellent responsiveness to credit needs given the number of institutions lending in the AA. The top five home mortgage lenders in the market including Empower Federal Credit Union, Americu Credit Union, Rocket Mortgage, M&T Bank, and CBNA, captured 37.2 percent of the market.

Based on 2023 small business loan data (2024 was not yet available), the bank ranked 18th out of 112 lending institutions, or the 16th percentile, with 0.7 percent market share, demonstrating excellent responsiveness to credit needs. The five largest small business lenders captured 62.3 percent of the market.

Based on 2023 small farm loan data (2024 was not yet available), the bank ranked 10th out of 14 lending institutions, or the 71st percentile, with 2.6 percent market share, demonstrating adequate responsiveness to credit needs. The five largest small farm lenders captured 71.7 percent of the market.

Distribution of Loans by Income Level of the Geography

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

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.

The geographic distribution of home mortgage loans in the state of New York is excellent. Moderate-income geographies contained greater opportunities for owner-occupied lending; therefore, carried significantly more weight in assessing the bank's performance in the AAs.

Buffalo-Cheektowaga NY MSA AA

The geographic distribution of home mortgage loans is excellent. For 2022-2023, the bank was near the percentage of owner-occupied housing units but exceeded aggregate lending in low-income CTs. The bank exceeded both demographics and aggregate lending in moderate-income CTs. For 2024, the proportion of loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied housing units and aggregate lending.

NY Non MSA AA

The geographic distribution of home mortgage loans is excellent. For 2022-2023, the proportion of loans in low-income geographies exceeded the percentage of owner-occupied housing units and was near aggregate lending. Lending in moderate-income geographies was near to both the percentage of owner-occupied housing units and aggregate lending. For 2024, the bank exceeded both demographics and aggregate lending in low-income CTs. Lending in moderate-income geographies was near both the percentage of owner-occupied housing units and aggregate lending.

Rochester NY MSA AA

The geographic distribution of home mortgage loans is excellent. For 2022-2023, the proportion of loans in low-income geographies was below the percentage of owner-occupied housing units and well below aggregate lending. Lending significantly exceeded both demographics and aggregate lending in moderate-income CTs. For 2024, the proportion of loans in both low- and moderate-income geographies significantly exceeded both the percentage of owner-occupied housing units and aggregate lending.

Syracuse NY MSA AA

The geographic distribution of home mortgage loans is excellent. For 2022-2023, the proportion of loans in low-income geographies was below the percentage of owner-occupied housing units and aggregate lending. Lending exceeded both demographics and aggregate lending in moderate-income CTs. For 2024, the proportion of loans in both low- and moderate-income geographies significantly exceeded both the percentage of owner-occupied housing units and aggregate lending.

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.

The geographic distribution of small loans to businesses in the state of New York is adequate. Moderate-income geographies contained greater opportunities for business lending, therefore, carried more weight in assessing the bank's performance in the AAs.

Buffalo-Cheektowaga NY MSA AA

The geographic distribution of small loans to businesses is poor. For 2022-2023, the bank was well below both the percentage of businesses and aggregate lending in both low- and moderate-income geographies. For 2024, the bank made no loans in low-income geographies but exceeded demographics in moderate-income geographies.

NY Non MSA AA

The geographic distribution of small loans to businesses is adequate. For 2022-2023, the bank was well below the percentage of businesses but below the aggregate lending in low-income geographies. Lending in moderate-income was well below the percentage of businesses and aggregate lending. For 2024, the bank exceeded the percentage of businesses in low-income geographies but below demographics in moderate-income geographies.

Rochester NY MSA AA

The geographic distribution of small loans to businesses is good. For 2022-2023, the bank was significantly below the percentage of businesses and aggregate lending in low-income geographies. Lending in moderate-income CTs exceeded both the percentage of businesses in moderate-income geographies and aggregate lending. For 2024, the bank made no loans in low-income geographies but exceeded the percentage of businesses in moderate-income geographies.

Syracuse NY MSA AA

The geographic distribution of small loans to businesses is adequate. For 2022-2023, the bank was significantly below the percentage of businesses and aggregate lending in low-income geographies. Lending in moderate-income CTs exceeded both the percentage of businesses in moderate-income geographies and aggregate lending. For 2024, the bank made no loans in low-income geographies and was well below the percentage of businesses in moderate-income geographies.

Small Loans to Farms

Refer to Table 11 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 farms.

The geographic distribution of small loans to farms in the state of New York is good.

Buffalo-Cheektowaga NY MSA AA

The bank did not originate or purchase a sufficient volume of small loans to farms in the 2022-2023 and 2024 evaluation periods for meaningful analysis. This is reasonable given CBNA's strategic focus is home mortgage lending.

NY Non MSA AA

The geographic distribution of small loans to farms is good. For 2022-2023, the bank did not originate or purchase any small loans to farms in low-income geographies. Demographics indicate there were only six farms located in these CTs, which limits lending opportunities. Lending in moderate-income CTs was below the percentage of farms in moderate-income geographies, but near aggregate lending. For 2024, the bank did not originate or purchase any small loans to farms in low-income geographies, which is reasonable since there were only seven farms reported located in low-income CTs. Lending exceeded demographics in moderate-income geographies.

Rochester NY MSA AA

The geographic distribution of small loans to farms is adequate. For 2022-2023, the bank did not originate or purchase any small loans to farms in low-income geographies, consistent with aggregate lenders. There were only 29 farms located in low-income CTs. Lending in moderate-income CTs was below the percentage of farms and aggregate lending, which is reasonable given only 223 farms located in these geographies which limits lending opportunities. For 2024, the bank did not originate or purchase

any small loans to farms in low-income geographies, consistent with aggregate lenders. There were only 35 farms located in low-income CTs. Lending in moderate-income CTs exceeded demographics.

Syracuse NY MSA AA

The bank did not originate or purchase a sufficient volume of small loans to farms in the 2022-2023 and 2024 evaluation periods for meaningful analysis. This is reasonable given CBNA's strategic focus is home mortgage lending.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CBNA's home mortgage loans and small loans to businesses and farms during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

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.

The borrower distribution of home mortgage loans to individuals of different income levels in the state of New York is good.

Buffalo-Cheektowaga NY MSA AA

The borrower distribution of home mortgage loans to individuals of different income levels is good. For 2022-2023, the bank's lending to low-income borrowers was well below the number of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below demographics. Lending to moderate-income borrowers exceeded both the number of moderate-income families and aggregate lending. For 2024, lending to low-income borrowers was significantly below the number of low-income families and below aggregate lending. Lending to moderate-income borrowers exceeded both demographics and aggregate lending.

NY Non MSA AA

The borrower distribution of home mortgage loans to individuals of different income levels is good. For 2022-2023, the bank's lending to low-income borrowers was well below the number of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below demographics. Lending to moderate-income borrowers exceeded both the number of moderate-income families and aggregate lending. CBNA's performance for 2024 was consistent with its performance during 2022-2023.

Rochester NY MSA AA

The borrower distribution of home mortgage loans to individuals of different income levels is excellent. For 2022-2023, the bank's lending to low-income borrowers was near the number of low-income families and exceeded aggregate lending. Lending to moderate-income borrowers exceeded both the

number of moderate-income families and aggregate lending. CBNA's performance for 2024 was consistent with its performance during 2022-2023.

Syracuse NY MSA AA

The borrower distribution of home mortgage loans to individuals of different income levels is good. For 2022-2023, the bank's lending to low-income borrowers was well below the number of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below demographics. Lending to moderate-income borrowers exceeded both the number of moderate-income families and aggregate lending. For 2024, lending to low-income borrowers was significantly below the number of low-income families and somewhat near aggregate lending. Lending to moderate-income borrowers exceeded demographics and approximated aggregate lending.

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 origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the state of New York is good.

Buffalo-Cheektowaga NY MSA AA

The distribution of small loans to businesses of different sizes is good. For 2022-2023, the distribution of small loans to businesses with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue but exceeded aggregate lending in the AA. For 2024, the bank's lending distribution was well below demographics.

NY Non MSA AA

The distribution of small loans to businesses of different sizes is good. For 2022-2023, the distribution of small loans to businesses with less than \$1 million in revenue was near the number of businesses with less than \$1 million in revenue and exceeded aggregate lending in the AA. For 2024, the bank's lending distribution was somewhat below demographics.

Rochester NY MSA AA

The distribution of small loans to businesses of different sizes is good. For 2022-2023, the distribution of small loans to businesses with less than \$1 million in revenue was near the number of businesses with less than \$1 million in revenue and exceeded aggregate lending in the AA. For 2024, the bank's lending distribution was somewhat below demographics.

Syracuse NY MSA AA

The distribution of small loans to businesses of different sizes is good. For 2022-2023, the distribution of small loans to businesses with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue but exceeded aggregate lending in the AA. For 2024, the bank's lending distribution was below demographics.

Small Loans to Farms

Refer to Table 11 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 farms. Aggregate data for 2024 was unavailable at the time of this examination.

The borrower distribution of small loans to farms in the state of New York is excellent.

Buffalo-Cheektowaga NY MSA AA

The distribution of small loans to farms of different sizes is good. For 2022-2023, the distribution of small loans to farms with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue but exceeded aggregate lending in the AA. For 2024, the bank's lending distribution was well below demographics.

NY Non MSA AA

The distribution of small loans to farms of different sizes is excellent. For 2022-2023, the distribution of small loans to farms with less than \$1 million in revenue substantially met the number of farms with less than \$1 million in revenue and exceeded aggregate lending in the AA. For 2024, the bank's lending distribution was near demographics.

Rochester NY MSA AA

The distribution of small loans to farms of different sizes is excellent. The bank's lending from 2022-2023 was near the percentage of farms and exceeded aggregate lending. During 2024, the bank's lending was near the percentage of small farms with revenues under \$1 million.

Syracuse NY MSA AA

The distribution of small loans to farms of different sizes is good. For 2022-2023, the distribution of small loans to farms with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue but exceeded aggregate lending in the AA. For 2024, the bank's lending distribution was well below demographics.

Community Development Lending

The institution is a leader in CD lending.

Refer to Table 3 in the Lending Activity section for 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.

Buffalo-Cheektowaga NY MSA AA

The institution made an excellent level of CD loans in the Buffalo-Cheektowaga NY MSA AA. CBNA originated seven loans totaling \$34.8 million, representing approximately 155.8 percent of allocated tier 1 capital. Three loans totaling \$6.1 million supported organizations providing community services to low- and moderate-income individuals and four loans totaling \$28.8 million funded revitalization and stabilization efforts.

By dollar volume, 17.4 percent of CD loans funded community services and 82.6 percent funded revitalization and stabilization efforts. There were no loans funded for economic development activities or affordable housing during the evaluation period.

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

- One loan totaling \$20 million to an organization redeveloping of a medical complex and several mixed-use properties with 10 percent of apartment units will be reserved as affordable housing.

- Three loans totaling \$8.8 million to an organization redeveloping a hotel in a moderate-income census tract.
- Two loans totaling \$6 million to an organization providing medical services to low- and moderate-income individuals in a rural area.

NY Non MSA AA

The institution made a relatively high level of CD loans in the NY Non MSA AA. CBNA originated 34 loans totaling \$29.1 million, representing approximately 5.2 percent of allocated tier 1 capital. Four loans totaling \$20 million supported revitalization and stabilization, three loans totaling \$4.6 million supported affordable housing, 26 loans totaling \$4.2 million supported organizations providing community services to low- and moderate-income individuals, and one loan totaling \$250,000 supported economic development.

By dollar volume, 68.7 percent funded revitalization and stabilization efforts, 15.8 percent of CD loans funded affordable housing, 14.4 percent funded community services, and 0.9 percent funded economic development activities.

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

- One loan totaling \$4.1 million to an organization providing affordable housing to low- and moderate-income senior citizens and disabled individuals.
- Two loans totaling \$2.3 million to an organization providing health services to low- and moderate-income individuals in rural areas.
- Eight loans totaling approximately \$600,000 to an organization providing low- and moderate-income individuals with medical rehabilitative and support services, including housing and vocational training.

Rochester NY MSA AA

The institution made an excellent level of CD loans in the Rochester NY MSA AA. CBNA originated four loans for \$30.7 million, representing approximately 35.3 percent of allocated tier 1 capital. One loan totaling \$14.5 million, or 47.2 percent of CD loans in the AA, funded an organization building a call center to supporting economic development in a moderate-income tract. Two loans totaling \$13.9 million, or 45.3 percent of CD loans in the AA, supported revitalization and stabilization providing community services targeting low- and moderate-income individuals during the evaluation period. Another loan totaling \$2.3 million, or 7.5 percent of CD loans in the AA, supported an organization building 62 units of affordable housing.

Syracuse NY MSA AA

The institution made an excellent level of CD loans in the Syracuse NY MSA AA. CBNA originated five loans totaling \$11.6 million, representing approximately 11.5 percent of allocated tier 1 capital. One loan totaling \$1 million supported affordable housing, three loans totaling \$4.6 million supported organizations providing community services to low- and moderate-income individuals, and one loan totaling \$6 million supported economic development efforts.

By dollar volume, 8.6 percent of CD loans funded affordable housing, 39.9 percent funded community services and 51.6 percent funded economic development activities. There were no loans funded for revitalization and stabilization efforts during the evaluation period.

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

- One Community Development Financial Institution loan totaling \$1 million to a support organization's mission of providing affordable housing in low- and moderate-income areas.
- One loan totaling \$2.5 million to an organization providing health services to low- and moderate-income individuals.
- One loan totaling \$6 million to an organization providing support to small business development, talent services, training, and networking.

New York Statewide

CBNA also originated four loans totaling \$28.7 million outside the bank's AAs for economic development in a low-income census tract. The loans benefited the greater regional area, specifically the Albany-Schenectady-Troy NY MSA AA. Consideration was given to these loans as CBNA was responsive to the CD needs and opportunities of its AAs.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank offers several lending programs that are available in all AAs, which include affordable homeownership grant programs, USDA housing loans, NCC mortgages, FNMA HomeReady Mortgages, FHLB HDP loans, VA loans, and a bank specific special purpose credit mortgage program. Additionally, the bank offers innovative small business lending programs, which include SBA loan programs, USDA Farm Service loans, and several customized lending programs that are focused on small and medium sized businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of New York section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance in the Albany-Schenectady-Troy NY MSA AA, Binghamton NY MSA AA, Glens Falls NY MSA AA, Ithaca NY MSA AA, and Elmira NY MSA AA was consistent with the bank's overall performance under the lending test in the full-scope areas. Performance in the Kingston NY MSA AA, Utica-Rome NY MSA AA, and Watertown-Fort Drum NY MSA AA were weaker than the bank's overall performance. Binghamton NY MSA AA, Utica-Rome NY MSA AA, and Watertown-Fort Drum NY MSA AA had weaker geographic lending performance, and there were no CD loans originated in the Glens Falls NY MSA AA. The Kingston NY MSA AA did not generate sufficient lending for analysis and had no CD lending. The weaker performance in the limited-scope AAs was not so significant to negatively impact overall lending test conclusion and overall rating.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Buffalo-Cheektowaga NY MSA, NY Non MSA, Rochester NY MSA, and Syracuse NY MSA was good.

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited an adequate responsiveness to credit and CD needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*									2022-2024	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<i>Full-Scope</i>										
Buffalo-Cheektowaga NY MSA	0	0	144	53,220	144	13.2	53,220	29.9	0	0
NY Non MSA	0	0	403	35,151	403	37.0	35,151	19.7	0	0
Rochester NY MSA	0	0	60	8,302	60	5.5	8,302	4.7	0	0
Syracuse NY MSA	0	0	176	24,329	176	16.2	24,329	13.7	0	0
<i>Limited-Scope</i>										
Albany-Schenectady-Troy NY MSA	0	0	96	27,900	96	8.8	27,900	15.7	0	0
Binghamton NY MSA	0	0	45	7,369	45	4.1	7,369	4.1	0	0
Elmira NY MSA	0	0	18	1,831	18	1.7	1,831	1.0	0	0
Glens Falls NY MSA	0	0	13	1,214	13	1.2	1,214	0.7	0	0
Ithaca NY MSA	0	0	8	1,475	8	0.7	1,475	0.8	0	0
Kingston NY MSA	0	0	3	764	3	0.3	764	0.4	0	0
Utica-Rome NY MSA	0	0	57	8,689	57	5.2	8,689	4.9	0	0
Watertown-Fort Drum NY MSA	0	0	54	2,514	54	5.0	2,514	1.4	0	0
Statewide	1	124	11	5,260	12	1.1	5,384	3.0	0	0
Total	1	124	1,088	178,018	1,089	100.0	178,142	100.0	0	0

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

Buffalo-Cheektowaga NY MSA AA

During the evaluation period, the bank purchased 122 MBS totaling \$53.2 million where the underlying borrowers were low- or moderate-income individuals in the AA. The bank additionally made 22 grants totaling approximately \$41,000 during the evaluation period to community organizations that provide services to low- and moderate-income individuals. Investments and donations totaled 238.2 percent of allocated tier 1 capital. The OCC did not consider any prior investments or uncommitted funds.

NY Non MSA AA

During the evaluation period, the bank purchased 172 MBS totaling \$34.6 million where the underlying borrowers were low- or moderate-income individuals in the AA. The bank additionally made 231 grants totaling approximately \$529,000 during the evaluation period to community organizations that provide services to low- and moderate-income individuals. Investments and donations totaled 6.2 percent of allocated tier 1 capital. The OCC did not consider any prior investments or uncommitted funds.

Rochester NY MSA AA

During the evaluation period, the bank purchased 37 MBS totaling \$8.3 million where the underlying borrowers were low- or moderate-income individuals in the AA. The bank additionally made 23 grants totaling approximately \$35,000 during the evaluation period to community organizations that provide

services to low- and moderate-income individuals. Investments and donations total 9.5 percent of allocated tier 1 capital. The OCC did not consider any prior investments or uncommitted funds.

Syracuse NY MSA AA

During the evaluation period, the bank purchased 89 MBS totaling \$23.8 million where the underlying borrowers were low- or moderate-income individuals in the AA. The bank additionally made 87 grants totaling approximately \$576,000 during the evaluation period to community organizations that provide services to low- and moderate-income individuals. Investments and donations total 24 percent of allocated tier 1 capital. The OCC did not consider any prior investments or uncommitted funds.

Broader Statewide or Regional Area

During the evaluation period, the bank participated in one state-wide alternative investments CBNA invested in solar tax credits with the bank's allocation equaling \$3.1 million benefiting low- and moderate-income geographies in the AAs and \$2.1 million benefiting low- and moderate-income geographies outside of the bank's AAs. In addition, the bank invested in one membership in a business development program for approximately \$124,000 in a prior period. In addition, the OCC noted the bank had approximately \$461,000 in prior period and \$198,000 in unfunded commitment investments to a small business investment company (SBIC); however, the bank did not provide a breakout of investments between states served and the investments were not given significant consideration.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Albany-Schenectady-Troy NY MSA AA, Binghamton NY MSA AA, Elmira NY MSA AA, Glens Falls NY MSA AA, Ithaca NY MSA AA, Kingston NY MSA AA, and Utica-Rome NY MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Watertown-Fort Drum NY MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope areas. The weaker performance had minimal effect on the overall Investment Test in the state of New York.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the NY Non MSA AA was good. Based on full-scope reviews, the bank's performance in the Rochester NY MSA AA and Syracuse NY MSA AA was adequate. Based on a full-scope review, the bank's performance in the Buffalo-Cheektowaga MSA AA was poor.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. Alternative delivery systems, which are detailed in the beginning of the PE for all AAs, had a neutral impact on the conclusion.

Table 5: Distribution of Branch Delivery Systems													2024
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
<i>Full-Scope</i>													
Buffalo-Cheektowaga NY MSA	2.4	3	2.1	0.0	0.0	66.7	33.3	0.0	12.5	15.3	40.5	29.9	1.8
NY Non MSA	60.2	79	55.6	2.5	16.5	65.8	15.2	0.0	1.3	15.4	67.0	15.3	1.0
Rochester NY MSA	9.3	12	8.5	0.0	33.3	50.0	16.7	0.0	9.6	16.2	43.4	29.7	1.2
Syracuse NY MSA	10.9	15	10.6	0.0	26.7	46.7	20.0	6.7	7.4	18.1	42.9	28.3	3.3
<i>Limited-Scope</i>													
Albany-Schenectady-Troy NY MSA	1.7	5	3.5	0.0	20.0	40.0	20.0	20.0	10.3	20.5	39.5	27.3	2.4
Binghamton NY MSA	0.7	2	1.4	0.0	0.0	100.0	0.0	0.0	5.0	20.8	36.9	35.8	1.5
Elmira NY MSA	3.0	5	3.5	40.0	20.0	20.0	20.0	0.0	12.7	13.4	53.3	18.9	1.8
Glens Falls NY MSA	0.8	2	1.4	0.0	50.0	50.0	0.0	0.0	0.0	14.8	77.7	7.5	0.0
Ithaca NY MSA	0.9	4	2.8	0.0	50.0	0.0	25.0	25.0	0.0	11.0	55.5	22.6	10.9
Kingston NY MSA	0.5	1	0.7	0.0	0.0	0.0	100.0	0.0	0.0	29.3	70.8	0.0	0.0
Utica-Rome NY MSA	4.1	7	4.9	0.0	0.0	57.1	28.6	14.3	9.3	17.1	41.9	25.6	6.1
Watertown-Fort Drum NY MSA	5.5	7	4.9	0.0	28.6	42.9	28.6	0.0	0.0	22.8	56.0	21.0	0.2
Total	100.0	142	100.0	2.8	19.7	55.6	18.3	2.8	7.5	16.6	49.0	25.1	1.9

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

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

Buffalo-Cheektowaga NY MSA AA

Delivery systems are unreasonably inaccessible to portions to low- and moderate-income geographies in the AA. CBNA operated three branches in the AA, with none in low- and moderate-income census tracts.

NY Non MSA AA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the AA. CBNA operated 79 branches in the AA including two branches in low-income census tracts and 13 in moderate-income census tracts. The number of low- and moderate-income census tracts slightly exceeded the proportion of the population in low- and moderate-income census tracts in the AA.

Rochester NY MSA AA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. CBNA operated 12 branches in the AA including four branches in moderate-income census tracts. The percentage of branches in moderate-income census tracts significantly exceeded the percentage of the population in moderate-income census tracts. The bank operated no branches in low-income census tracts, which is significantly lower than the percentage of the population in low-income census tracts in the AA.

Syracuse NY MSA AA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. CBNA operated 15 branches in the AA including four branches located in moderate-

income census tracts. The percentage of branches in moderate-income census tracts exceeded the percentage of the population in moderate-income census tracts. The bank operated no branches in low-income census tracts, which is significantly lower than the percentage of the population located in low-income census tracts in the AA.

Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
<i>Full-Scope</i>							
Buffalo-Cheektowaga NY MSA	0	2	0	0	-2	0	0
NY Non MSA	0	20	0	0	-16	-4	0
Rochester NY MSA	0	3	0	0	-3	0	0
Syracuse NY MSA	1	0	0	0	0	0	+1
<i>Limited-Scope</i>							
Albany-Schenectady-Troy NY MSA	0	0	0	0	0	0	0
Binghamton NY MSA	0	1	0	0	-1	0	0
Elmira NY MSA	5	2	+1	+1	+1	0	0
Glens Falls NY MSA	0	0	0	0	0	0	0
Ithaca NY MSA	3	0	0	+2	0	+1	0
Kingston NY MSA	0	0	0	0	0	0	0
Utica-Rome NY MSA	0	1	0	0	-1	0	0
Watertown-Fort Drum NY MSA	0	0	0	0	0	0	0
Total	9	29	+1	+3	-22	-3	+1
<i>1/1/2024 - 12/31/2024 Bank Data.</i>							

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

To the extent changes have been made, the institution's opening and closing of branches has not adversely impacted the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, CBNA closed net 20 branches across various AAs. All branches closed were located in middle- or upper-income geographies with market overlap with other branches, limited growth opportunity, and limited profitability. CBNA opened nine branches during the evaluation period, four of which were in low- or moderate-income geographies. The low- and moderate-income locations were opened in the Elmira NY MSA AA and Ithaca NY MSA AA as part of the Elmira Savings Bank acquisition.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or individuals. Branch opening hours ranged from 8:00 a.m. to 9:00 a.m., and closing hours ranged from 3:00 p.m. to 6:00 p.m. A few branches have Saturday branch or drive-up hours. Management sets branch hours based upon customer needs and traffic patterns in each branch and AA.

Buffalo-Cheektowaga NY MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA. The bank did not operate any branches in low- or moderate-income geographies.

NY Non MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Some branches have extended hours on various days. Three branches in a moderate-income census tract have Saturday hours.

Rochester NY MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Some branches have extended hours on various days. Two branches in a moderate-income census tract have Saturday hours.

Syracuse NY MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Some branches have extended hours on various days.

Community Development Services

The institution provided an adequate level of CD services.

Buffalo-Cheektowaga NY MSA AA

The institution provided a limited level of CD services to identified CD needs in the AA. During the evaluation period, five employees contributed 172 qualified hours to 10 organizations. One employee contributed 60.4 percent of the hours to a community service organization that provides services to low- and moderate-income children by serving as a member on the board of directors and the finance committee. The remaining hours were composed of financial literacy programs, small business mentoring, and serving on boards and committees for community service organizations focusing on assisting low- and moderate-income individuals and families.

The following is an example of CD services the bank performed in the AA:

- One employee provided financial literacy education for first time homebuyers in a low-income census tract.
- One employee provided mentoring on banking needs to new small businesses owners.

NY Non MSA AA

The institution provided an adequate level of CD services to identified CD needs in the AA. During the evaluation period, 87 employees contributed 2,173 qualified service hours to 86 organizations. The majority of service hours consisted of bank personnel serving in a leadership role for the organizations. bank personnel provided financial and banking expertise to 22 affordable housing organizations, 37 community service organizations, 25 economic development organizations, and two organizations focused on the revitalization and re-stabilization of low- and moderate-income geographies.

The following is an example of CD services the bank performed in the AA:

- One employee served on the board of a land bank that acquires vacant and blighted properties and develops strategic redevelopment plans to return the parcels to income-generating, taxable projects.
- Six employees served as board members housing authorities that provided affordable housing to low- and moderate-income individuals.
- One employee served as a board member on an economic development organization that provides a loan program for small businesses in three rural counties.

Rochester NY MSA AA

The institution provided a limited level of CD services to identified CD needs in the AA. During the evaluation period, ten employees contributed 221 hours of qualified service hours to 13 organizations. The majority of service hours consisted of bank personnel serving in a leadership role for the organizations. Bank personnel provided financial and banking expertise to four affordable housing organizations, six community service organizations, and three economic development organizations.

The following is an example of CD services the bank performed in the AA:

- Two employees served on a committee for a town organization that gives grants and loans to small businesses.
- Five employees taught financial literacy skills to low- and moderate individuals, families, and students.
- One employee is a board member for an organization that provides services for disabled persons including employment education and health and housing in low-income census tracts.

Syracuse NY MSA AA

The institution provided an adequate level of CD services given identified CD needs in the AA. During the evaluation period, 17 employees contributed 659 qualified service hours to 22 organizations. The majority of service hours consisted of bank personnel serving in a leadership role for the organizations. Bank personnel provided financial and banking expertise to four affordable housing organizations, 12 community service organizations, four economic development organizations, and two organizations focused on the revitalization and stabilization of low- and moderate-income geographies.

The following are examples of CD services the bank performed in the AA:

- One employee provided financial literacy education for children in a school where 69 percent of the children receive free or reduced lunch.
- Three employees served as board members to a land bank focused on revitalizing vacant and blighted housing and providing affordable housing.
- One employee served on a loan committee in her capacity as a board member for a city organization providing loans and grants to small businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Elmira NY MSA AA, Ithaca NY MSA AA, and Watertown-Fort Drum NY MSA AA was stronger than the bank's overall performance under the Service Test in the full-scope areas. Based on limited-scope reviews, the bank's performance under the Service Test in the Albany-Schenectady-Troy NY MSA AA was consistent with the bank's overall performance under the Service Test in the full-scope areas. Based on limited-scope reviews, the bank's performance under the Service Test in the Binghamton NY MSA AA, Glens Falls

NY MSA AA, Kingston NY MSA AA, and Utica-Rome NY MSA AA was weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance in the AAs had minimal effect on the overall Service Test in the state of New York.

State of Pennsylvania

CRA rating for the State of Pennsylvania: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to the credit needs in the AAs.
- The geographic distribution of loans in the AA is good.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses of different sizes is adequate.
- The use of innovative and flexible loan products contributed positively to the bank's performance.
- The level of CD loans is limited.
- The bank has an excellent level of qualified investments but through passive investments.
- Service delivery systems were accessible to geographies and individuals of different income levels in the AAs.
- The bank provided a limited level of CD services.

Description of Institution's Operations in Pennsylvania

CBNA had three AAs in the state of Pennsylvania consisting of the Allentown-Bethlehem-Easton, PA MSA AA (Allentown-Bethlehem-Easton PA MSA AA) (MSA #10900); Scranton-Wilkes-Barre, PA MSA AA (Scranton-Wilkes-Barre PA MSA AA) (MSA #42540), and non-metropolitan counties in Pennsylvania (PA Non MSA AA). The three contiguous AAs are in northeastern and central Pennsylvania. The Allentown-Bethlehem-Easton PA MSA AA consisted of a portion Carbon County, where the bank had its physical presence, and a portion of Schuylkill County. CBNA does not have any branches in Schuylkill County; however, the branch in Carbon County is located on the line between the two counties and CBNA included whole townships in the adjacent census tracts. The Scranton-Wilkes-Barre PA MSA consisted of three full counties: Wyoming, Lackawanna, and Luzerne. The PA Non MSA AA consisted of Susquehanna County and portions of Bradford. CBNA operated 19 branches with ATMs, two standalone drive-up branches with ATMs, and four branches without ATMs in the state during the evaluation period. The 25 branches and drive-ups represented 12.7 percent of the bank's branch network.

CBNA's strategy during the evaluation period emphasized organic loan and deposit growth. CBNA's business activities include commercial banking, retail banking, and wealth management services. Home loans accounted for 73.2 percent of loans originated in Pennsylvania. Small business and small farm loans accounted for 23.6 percent and 0.3 percent of loans, respectively. The bank faced strong competition for deposits and loans in the state.

During the evaluation period, CBNA originated or purchased 11.6 percent of its total home mortgages, 16.41 percent of its total small business loans, and 1.5 percent of its total small farm loans in the state of Pennsylvania.

Scranton–Wilkes-Barre PA MSA AA

CBNA operated 19 branches and two standalone drive-up branches in the Scranton–Wilkes-Barre PA MSA AA during the evaluation period. The bank also operated 22 deposit-taking ATMs, one of which was a standalone ATM. Two branches were in low-income census tracts in Luzerne and Lackawanna Counties. Five branches and a two drive-ups were in moderate-income census tracts, with three branches and a drive-up in Luzerne County and two branches and the drive-up window in Lackawanna County. The 21 branches and drive-up branches accounted for 10.66 percent of the bank-wide branch network and 84.00 percent of branches in the state of Pennsylvania.

The bank faced strong competition for deposits in the Scranton–Wilkes-Barre PA MSA AA. According to the FDIC Deposit Market Share Report as of June 30, 2024, CBNA reported \$1.3 billion in deposits in the AA, which represented 9.9 percent of the bank’s total deposits. CBNA ranked fifth out of 22 depository institutions with a deposit market share of 8.3 percent. The bank’s top competitors for deposit market share in the AA include PNC Bank, N.A. with 22.3 percent, The Fidelity Deposit and Discount Bank with 10.3 percent, M&T Bank with 9.1 percent, and FNCB Bank with 8.5 percent.

CBNA originated and purchased 9.7 percent of its total home mortgage loans in the Scranton–Wilkes-Barre PA MSA AA and 84.1 percent of home mortgage loans in the state of Pennsylvania in the AA during the evaluation period. CBNA originated and purchased 13.2 percent of its total small business loans in the Scranton–Wilkes-Barre PA MSA AA and 80.3 percent of small business loans in the state of Pennsylvania in the AA during the evaluation period.

Economic Data

According to the January 2025 Moody’s Analytics report, the Scranton–Wilkes-Barre, PA MSA was in the late expansion phase of the business cycle. The area benefited from its proximity to several large east coast markets, below average living costs, and significant healthcare presence. The proximity to Northeast metro areas and access to interstate highways make the MSA a logistics hub and provides modest support for growth. However, the distribution and logistics sectors, among others dominating the economy in the MSA, have a concentration of low-paying jobs. The MSA has a significant healthcare presence that is positioned for growth with the construction of medical centers that will drive economic growth and job creation.

According to the U.S. BLS December 2024 data, the unemployment rate (not seasonally adjusted) in the Scranton–Wilkes-Barre, PA MSA was 3.8 percent, which is in line with the state unemployment rate of 3.7 percent. During the evaluation period, unemployment ranged from a low of 3.6 percent in April 2024 to a high of 5.8 percent in August 2022. Generally, the unemployment rate trailed above the state’s unemployment rate. Per Moody’s Analytics, key sectors of the economy include education and health services, manufacturing, professional and business services, and government. Top employers in the MSA include Geisinger Health System, Mohegan Sun at Pocono Downs, Community Health Systems, Navient, and Prime Inc.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from seven community contacts conducted during the evaluation period within the full-scope AAs to determine local economic conditions and community needs. The community contacts noted the need for programs to assist with affordable homeownership, particularly entry-level and senior housing, food pantries, and elder financial literacy workshops focused on preventing elder abuse.

Scranton–Wilkes-Barre PA MSA AA

Scranton–Wilkes-Barre PA MSA AA -2024						
2022-2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	168	3.0	28.0	47.6	20.8	0.6
Population by Geography	567,559	3.0	26.1	45.6	24.8	0.5
Housing Units by Geography	264,290	2.8	25.7	48.0	23.0	0.5
Owner-Occupied Housing by Geography	153,036	1.3	18.1	52.0	28.5	0.2
Occupied Rental Units by Geography	75,627	5.8	38.7	39.6	15.0	0.8
Vacant Units by Geography	35,627	2.9	30.5	48.7	16.6	1.3
Businesses by Geography	25,300	4.9	24.3	43.4	27.1	0.3
Farms by Geography	718	1.8	12.4	57.5	28.1	0.1
Family Distribution by Income Level	141,619	21.6	17.3	20.5	40.6	0.0
Household Distribution by Income Level	228,663	24.8	16.0	17.1	42.2	0.0
Unemployment rate (%)	5.3	10.7	7.2	4.8	3.7	36.0
Households Below Poverty Level (%)	13.4	29.5	21.1	11.2	7.3	49.9
Median Family Income Scranton–Wilkes-Barre PA MSA AA		\$70,003	Median Housing Value			\$121,250
Median Family Income Scranton–Wilkes-Barre PA MSA AA for 2024		\$83,000	Median Gross Rent			\$795
			Families Below Poverty Level			10.3
FFIEC File – 2020 Census FFIEC File – 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Pennsylvania

The OCC conducted a full-scope review of the Scranton–Wilkes-Barre PA MSA AA and limited-scope reviews of the Allentown-Bethlehem-Easton PA MSA AA and PA Non MSA AA. The full-scope AA accounted for 86.9 percent of deposits, 83 percent of loans, and 84 percent of branches in the state of Pennsylvania. Home mortgage loans, which accounted for 73.2 percent of loans originated or purchased in the state’s AAs during the evaluation period, were given more weight than small business loans. CBNA did not originate enough small farm loans during the evaluation period in any of the state’s AAs to provide a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Scranton–Wilkes-Barre PA AA was adequate.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Table 3: Lending Activity							2022-2024	
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
<i>Full-Scope</i>								
Scranton–Wilkes-Barre PA MSA AA	1,512	466	3	72	2,053	83.5	86.9	
<i>Limited-Scope</i>								
Allentown-Bethlehem-Easton PA MSA	109	21	2	1	133	5.4	4.3	
PA Non MSA AA	178	93	3	0	274	11.1	8.8	
Total	1,799	580	8	73	2,460	100.0	100.0	
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
<i>Full-Scope</i>								
Scranton–Wilkes-Barre PA MSA AA	247,508	78,911	325	3,205	329,949	84.6	86.9	
<i>Limited-Scope</i>								
Allentown-Bethlehem-Easton PA MSA	8,393	2,747	850	10,450	22,440	5.8	4.3	
PA Non MSA AA	21,643	15,275	700	0	37,618	9.7	8.8	
Total	277,544	96,933	1,875	13,655	390,007	100.0	100.0	
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

Lending levels demonstrate adequate responsiveness in the Scranton–Wilkes Barre PA MSA AA.

Per the FDIC Deposit Market Share Report as of June 30, 2024, the bank ranked fifth out of 22 depository institutions, or the 23rd percentile, with 8.3 percent of the market share. CBNA reported \$1.31 billion in deposits in the AA.

Based on the 2024 HMDA market share data, CBNA ranked fourth out of 398 lending institutions, or the top first percentile, with a 3.6 percent market share in the AA, demonstrating excellent responsiveness to credit needs. The top five lenders, which consist of Rocket Mortgage, PennyMac Loan Services, LLC, Fidelity Deposit & Discount Bank, Community Bank, N.A., and Luzerne Bank had a combined market share of 22.6 percent. Market share for the top five lenders ranged from 3.1 percent (Luzerne Bank) to 7.5 percent (Rocket Mortgage).

Based on the 2023 CRA small business loan data, the bank ranked 12th out of 97 lending Institutions, or top 12th percentile, with a 1.8 percent market share, demonstrating good responsiveness to credit needs. The top five lenders in the market, American Express National Bank, JPMorgan Chase Bank, N.A., Capital One, N.A., Synchrony Bank, and Citibank, N.A. had a combined market share of 58.9 percent. Market share of the top five lenders ranged from 5.9 percent (Citibank, N.A.) to 24.2 percent (American Express National Bank).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table 7 in the state of Pennsylvania 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 is excellent. The geographic distribution of home mortgage loans originated in low- and moderate-income census tracts exceeded both the percentage of owner-occupied housing units and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table 9 in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of originations and purchases of small loans to businesses.

The geographic distribution of loans to businesses is poor. The distribution of loans to businesses in low-income census tracts was below the percentage of businesses located in low-income census tracts and aggregate lending in the AA. The geographic distribution of loans to businesses in moderate-income tracts was below the percentage of businesses located in moderate-income tracts and aggregate lending in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CBNA's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous 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 business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Pennsylvania 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 geographic distribution of home mortgage loans to individuals of different income levels is excellent. Although home mortgage lending to low-income borrowers was well below the number of low-income families, lending was significantly above the aggregate percentage of lending in the AA. Home mortgage lending to moderate-income borrowers was above both the percentage of moderate-income families and aggregate lending to moderate-income families in the AA.

Small Loans to Businesses

Refer to Table 10 in the state of Pennsylvania 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 small loans to businesses of different sizes is poor. The distribution of loans to businesses with revenues less than \$1 million in annual revenue was well below the percentage of businesses with less than \$1 million in annual revenue and near to the percentage of aggregate lending to businesses with less than \$1 million in annual revenue.

Community Development Lending

The institution had made a limited level of CD loans.

Refer to Table 3 in the Lending Activity section for 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.

During the evaluation period, CBNA originated 72 loans totaling \$3.2 million in the Scranton–Wilkes-Barre PA MSA AA. All loans originated were to support organizations to providing community services to low- and moderate-income individuals.

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

- Sixty-seven loans totaling \$2.6 million to one organization providing services to low- and moderate-income individuals with disabilities.
- Two loans totaling \$250,000 to a federally qualified health center focused on serving low- and moderate-income individuals in rural areas.
- Two loans totaling \$40,000 were for two organizations in moderate-income census tracts providing medical and fire services.
- One loan totaling \$277,718 to an organization providing day shelters for homeless individuals as well as drug and alcohol treatment.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank offers several lending programs that are available in all AAs, which include affordable

homeownership grant programs, USDA housing loans, NCC mortgages, FNMA HomeReady Mortgages, FHLB HDP loans, VA loans, and a bank specific special purpose credit mortgage program. Additionally, the bank offers innovate small business lending programs, which include SBA loan programs, USDA Farm Service loans, and several customized lending programs that are focused on small and medium sized businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Pennsylvania section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank’s performance under the Lending Test in the Allentown-Bethlehem-Easton PA MSA AA was stronger than the bank’s overall performance under the Lending Test in the full-scope area. Based on a limited-scope review, the bank’s performance under the Lending Test in the PA Non MSA AA was weaker than the bank’s overall performance under the Lending Test in the full-scope area. The weaker performance in the PA Non MSA AA has minimal impact on the bank’s overall performance under the Lending Test in the state of Pennsylvania.

INVESTMENT TEST

The bank’s performance under the Investment Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope review, the bank’s performance in the Scranton–Wilkes-Barre PA AA was good.

The bank has an excellent level of qualified CD investment and grants, but not in a leadership position, particularly nor those that are not routinely provided by private investors.

The institution exhibited adequate responsiveness to credit and CD needs. The institution rarely used, innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*									2022-2024	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<i>Full-Scope</i>										
Scranton-Wilkes Barre PA MSA	0	0	252	37,991	252	82.6	37,991	86.8	0	0
<i>Limited-Scope</i>										
Allentown-Bethlehem-Easton PA MSA	0	0	20	2,337	20	6.6	2,337	5.3	0	0
PA Non MSA	0	0	30	3,414	30	9.8	3,414	7.8	0	0
Broader Statewide or Regional Area	0	0	3	8	3	1.0	8	0.0		
Total	0	0	305	43,821	305	100.0	43,821	100.0	0	0

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

During the evaluation period, the bank purchased 104 MBS totaling \$37.6 million where the underlying borrowers were low- or moderate-income individuals in the AA. The bank also made 148 qualifying

donations and grants totaling approximately \$356,000 to organizations focused on providing services in the AA to low- and moderate-income individuals and economic development for small businesses. This represented approximately 32 percent of allocated tier 1 capital for this AA.

Broader Statewide or Regional Area

In addition, the OCC noted the bank had approximately \$1 million in prior period and \$1.1 million in unfunded commitment investments to rural business investment programs (RBIP) and a venture funds; however, the bank did not provide a breakout of investments between states served and the investments were not given significant consideration.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank’s performance under the Investment Test in the Allentown-Bethlehem-Easton PA MSA AA and PA Non MSA AA was consistent with the bank’s overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank’s performance under the Service Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Scranton–Wilkes-Barre PA AA was good.

Retail Banking Services

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

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits % of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)					Population % of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
				Full-Scope									
Scranton–Wilkes-Barre PA MSA	86.9	21	84.0	9.5	33.3	42.9	14.3	0.0	3.0	26.1	45.6	24.8	0.5
Limited-Scope													
Allentown-Bethlehem-Easton PA MSA	4.3	2	8.0	50.0	0.0	50.0	0.0	0.0	10.7	57.8	31.6	0.0	0.0
PA Non MSA	8.8	2	8.0	0.0	0.0	100.0	0.0	0.0	0.0	16.6	78.3	5.1	0.0
Total	100.0	25	100.0	12.0	28.0	48.0	12.0	0.0	3.1	26.9	48.3	21.3	0.4
Source: FFIEC File – 2020 and 2024 Census 1/1/2022 – 12/31/2024 Bank Data													
Due to rounding, totals may not equal 100.0%													

CBNA operated 21 branches in the Scranton–Wilkes-Barre PA MSA AA, including two branches in low-income census tracts and five in moderate-income census tracts. The institution also had two drive-up locations in moderate-income census tracts. Branches in low- and moderate-income tracts exceeded the percentage of the population located within low- and moderate-income tracts.

Table 6: Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)				
	# of Branch Openings	# of Branch Closings					
			Low	Mod	Mid	Upp	NA
<i>Full-Scope</i>							
Scranton–Wilkes-Barre PA MSA	1	1	0	-1	+1	0	0
<i>Limited-Scope</i>							
Allentown-Bethlehem-Easton PA MSA	0	0	0	0	0	0	0
PA Non MSA	0	1	0	-1	0	0	0
Total	1	2	0	-2	+1	0	0
<i>1/1/2022-12/31/2024 Bank Data.</i>							

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

To the extent changes have been made, the institution’s opening and closing of branches had generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. CBNA closed two branches, both located in moderate-income census tracts. One closure occurred in the Scranton–Wilkes-Barre PA MSA AA, which relocated to a nearby middle-income census tract. The percentages of branches in low- and moderate-income geographies remains in excess of the percentages of the populations in those geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations. Most branches have extended hours toward the end of standard work week, and all but two branches located in low-income geographies have Saturday hours.

Community Development Services

The institution provided a limited level of CD services to identified CD needs in the AA. During the evaluation period, 19 employees contributed 586 hours to 19 organizations, primarily in leadership roles. The top two employees accounted for 42.4 percent of the hours in the AA. Bank personnel provided financial and banking expertise to four economic development organizations and 14 community service organizations.

The following are examples of CD services performed in the AA:

- Two employees provided 46 hours as board members of an economic development organization that provides workforce development, small business support, and economic development services.
- Two employees provided 103 hours as a board and committee members for a community service organization that provides various community service activities to low- and moderate-income children and families.
- Two employees provided 123 hours as board and committee members to a local youth center that provided community service activities for low-and moderate-income children and families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Allentown-Bethlehem-Easton PA MSA AA and PA Non MSA AA was weaker than the bank's overall performance under the Service Test in the full-scope area. The weaker performance in the AAs had minimal impact on the bank's overall performance under the Service Test in the state of Pennsylvania.

State of Vermont

CRA rating for the State of Vermont: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans in the AA is good.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses of different sizes is excellent.
- The bank's CD Lending was excellent and has a positive impact on the Lending Test rating.
- The use of innovative and flexible loan products contributed positively to the bank's performance.
- The bank has an excellent level of qualified investments but through passive investments
- The bank's delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank provides a limited level of CD services.

Description of Institution's Operations in Vermont

CBNA has two AAs in the state of Vermont consisting of the Burlington-South Burlington, VT MSA AA (Burlington VT MSA AA) (MSA #15540) and the VT Non MSA AA. The Burlington-South Burlington VT MSA AA consists of Chittenden, Franklin, and Grand Isle counties. The VT Non MSA AA consists of Bennington, Caledonia, Lamoille, Washington, and Windham counties as well as whole townships but part of the counties in Addison, Orange, Rutland, and Windsor. CBNA operated 29 branches equipped with ATMs and two standalone, deposit-taking ATMs in Vermont during the evaluation period. The 29 branches represented 14.7 percent of the bank's branch network.

CBNA's strategy during the evaluation period emphasized organic loan and deposit growth. CBNA's business activities include commercial banking, retail banking, and wealth management services. Small business loans accounted for 20.2 percent of CBNA loans (based on home mortgage loans, small business loans, and small farm loans) originated in the state. Home mortgage loans accounted for 78.9 percent of CBNA loans and small farm loans accounted for 0.81 percent of CBNA loans in the state. CBNA originated and purchased 6.9 percent of its total home mortgages and 7.8 percent of its total small business loans in the state of Vermont AAs during the evaluation.

VT Non MSA AA

CBNA operated 17 branches equipped with deposit-taking ATMs in the VT Non MSA AA. Two branches were located in moderate-income census tracts. The 17 branches accounted for 8.6 percent of the bank's total branch network and 58.6 percent of the branches in the state of Vermont.

The bank faced strong competition for deposits and loans in the AA. According to June 30, 2024, FDIC Deposit Market Share report, CBNA reported \$735.6 million in deposits in the AA, which represented 5.5 percent of the bank's total deposits. CBNA ranked sixth out of 20 depository institutions with a deposit market share of 7.6 percent. The bank's top competitors for deposit market share in the AA include TD Bank with 19.1 percent, M&T Company with 12.9 percent, Northfield Savings Bank with 8.9 percent, Mascoma Bank with 7.8 percent, and Union Bank with 7.8 percent.

CBNA originated and purchased 4.4 percent of its total home mortgage loans in the VT Non MSA AA, and 62.9 percent of home mortgage loans originated in the state of Vermont were originated in the VT Non MSA AA during the evaluation period. CBNA originated and purchased 2.8 percent of its total small business loans in the VT Non MSA AA, and 36 percent of small business loans originated in the state of Vermont were originated in the VT Non MSA AA during the evaluation period.

Economic Data

The NY Non MSA AA includes whole or parts of counties in Central and Southern Vermont, and in parts of Northern Vermont. Vermont as a whole is in the mid expansion phase of the business cycle according to the Moody's Analytics report. Key economic drivers of the AA include tourism and hospitality, and semiconductor manufacturing.

According to December 2024 U.S. BLS data, unemployment rates (not seasonally adjusted) in the AA ranged from a low of 2.2 percent in Addison County to a high of 3.1 percent in Bennington County. Two counties in the AA have lower unemployment rates than the state of Vermont's 2.5 percent, and the remaining seven counties had higher rates than the state's.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts conducted during the evaluation period within the Vermont AAs to determine local economic conditions and community needs. One community contact noted the need for more affordable housing and the credit needs for small businesses, particularly for start-ups and microbusinesses with fewer than five employees. Another community contact noted the state of Vermont is very rural, and there is a need for affordable housing and economic development in cities like Burlington, but also other parts of the state that attract less capital for investment.

VT Non MSA AA

VT Non MSA AA - 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	113	0.0	11.5	65.5	22.1	0.9
Population by Geography	350,316	0.0	12.7	64.8	22.0	0.5
Housing Units by Geography	193,605	0.0	11.7	66.1	20.6	1.6
Owner-Occupied Housing by Geography	105,401	0.0	11.3	66.1	22.2	0.3
Occupied Rental Units by Geography	39,997	0.0	19.1	60.3	20.1	0.5
Vacant Units by Geography	48,207	0.0	6.5	70.9	17.3	5.3
Businesses by Geography	19,218	0.0	13.2	59.5	26.5	0.8
Farms by Geography	1,560	0.0	8.2	64.7	26.7	0.3
Family Distribution by Income Level	86,452	19.4	18.1	22.4	40.2	0.0
Household Distribution by Income Level	145,398	24.2	15.9	18.2	41.7	0.0
Unemployment rate (%)	3.8	0.0	5.0	3.9	2.6	8.0
Households Below Poverty Level (%)	11.1	0.0	17.6	10.8	7.9	14.2
Median Family Income (VT Non MSA AA)		\$77,189			Median Housing Value	\$215,100
Median Family Income (VT Non MSA AA) for 2024		\$95,000			Median Gross Rent	\$928
					Families Below Poverty Level	6.8
FFIEC File – 2020 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						

Scope of Evaluation in Vermont

The OCC conducted a full-scope review of the VT Non MSA AA and a limited-scope review of the Burlington-South Burlington VT MSA AA. The full-scope AA accounted for 50.1 percent of deposits, 57.3 percent of loans, and 58.6 percent of branches in the state of Vermont. Home mortgage loans, which accounted for 79 percent of loans originated or purchased in the state’s AAs during the evaluation period, were given more weight than small business loans. CBNA did not originate enough small farm loans during the evaluation period in either AA to provide a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

The bank’s performance under the Lending Test in Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

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	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
<i>Full-Scope</i>									
VT Non MSA AA	675	99	4	6	0	784	57.4	50.1	
<i>Limited-Scope</i>									
Burlington-South Burlington VT MSA AA	398	176	7	1	0	582	42.6	49.9	
Total	1,073	275	11	7	0	1,366	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
<i>Full-Scope</i>									
VT Non MSA AA	105,484	17,506	132	16,180	0	139,302	36.39	50.1	
<i>Limited-Scope</i>									
Burlington-South Burlington VT MSA AA	185,316	42,602	578	15,000	0	243,496	63.61	49.9	
Total	290,800	60,108	710	31,180	0	382,798	100.0	100.0	
Source: 1/1/2022 - 12/31/2024 Bank Data.									
Due to rounding, totals may not equal 100.0%									

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

Per the FDIC Deposit Market Share Report as of June 30, 2024, the bank ranked sixth out of 20 depository institutions, or the 30th percentile, with a 7.6 percent deposit market share. CBNA reported \$735.6 million in deposits in the AA.

Based on the 2024 HMDA market share data, CBNA ranked seventh out of 223 lending institutions, or the third percentile, with a 3.6 percent market share, demonstrating adequate responsiveness to credit needs. The top five home mortgage lenders in the market were EastRise Federal Credit Union, Rocket Mortgage, North County Federal Credit Union, Mascoma Bank, and EMM Loans LLC and had a combined market share of 32.25 percent. Market share for the top five lenders ranged from 4.05 percent to 11.56 percent.

Based on the 2023 CRA small business loan data, the bank ranked 24th out of 89 lending institutions, or the 27th percentile, with a 0.5 percent market share, demonstrating adequate responsiveness to credit needs. The top five lenders in the market, American Express National Bank, JPMorgan Chase Bank, NA, Capital One, N.A., Citibank, N.A., Lake Forest Bank & Trust Co, N.A. had a combined market share of 65.3 percent by number of loans. The top five lenders' market shares ranged from 3.4 percent (Lake Forest Bank & Trust Co, N.A.) to 24.9 percent (American Express National Bank).

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 7 in the state of Vermont 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 is excellent. The geographic distribution of home mortgage loans in moderate-income census tracts exceeded the percentage of owner-occupied housing and aggregate lending in the AA. There are no low-income CTs in this AA.

Small Loans to Businesses

Refer to Table 9 in the state of Vermont 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 is poor. The geographic distribution of small loans to businesses in moderate-income tracts was below the percentage of businesses located in moderate-income census tracts and aggregate lending in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CBNA's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent 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 8 in the state of Vermont 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 is excellent. Home mortgage lending to low-income borrowers was below the number of low-income families but significantly exceeded the aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers exceeded both the number of moderate-income families and the aggregate lending to moderate-income families in the AA.

Small Loans to Businesses

Refer to Table 10 in the state of Vermont 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 small loans to businesses of different sizes is excellent. The distribution to small loans to businesses with less than \$1 million in revenue was near to the number of businesses with less than \$1 million in revenue and exceeded the aggregate lending in the AA.

Community Development Lending

The institution was a leader in making CD loans and had a positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for 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.

The level of CD lending was excellent. CBNA made six CD loans totaling \$16.2 million, representing 24.24 percent of the allocated tier 1 capital. Three loans totaling \$11.6 million supported revitalization and stabilization efforts and three loans totaling \$4.6 million supported organizations providing community services to low- and moderate-income individuals.

By dollar volume, 71.6 percent of CD loans funded revitalization and stabilization efforts and 28.4 percent funded community service. There were no loans funded for economic development activities or affordable housing during the evaluation period.

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

- Two loans totaling \$11.5 million to a nonprofit municipal power supplier in Vermont and greater region to improve equipment and upgrade software and infrastructure, increasing efficiencies and reduced costs for residents of the AA.
- One loan totaling \$3.4 million to a school district with 51.5 percent of its students qualifying for free or reduced cost lunch to renovate school facilities.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank offers several lending programs that are available in all AAs, which include affordable homeownership grant programs, USDA housing loans, NCC mortgages, FNMA HomeReady Mortgages, FHLB HDP loans, VA loans, and a bank specific special purpose credit mortgage program. Additionally, the bank offers innovative small business lending programs, which include SBA loan programs, USDA Farm Service loans, and several customized lending programs that are focused on small and medium sized businesses.

Conclusions for Area Receiving a Limited-Scope Review

Refer to Tables 7 through 14 in the state of Vermont section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the Burlington-South Burlington VT MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area.

INVESTMENT TEST

The bank's performance under the Investment Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the VT Non MSA AA was good. The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited adequate responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				2022-2024 Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
	<i>Full-Scope</i>									
VT Non MSA	0	0	93	12,241	93	59.6	12,241	51.3	0	0
<i>Limited-Scope</i>										
Burlington – South Burlington VT MSA	0	0	60	7,489	60	38.5	7,489	31.4	0	0
Broader Statewide or Regional Area	3	4,123	0	0	3	1.9	4,123	17.3	1	6
Total	3	4,123	153	19,730	156	100.0	23,853	100.0	1	6

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

During the evaluation period, the bank purchased 48 MBS totaling \$12.8 million where the underlying borrowers were low- or moderate-income individuals in the AA. The bank made 45 grants totaling \$181,100 during the evaluation period to community organizations that provide services to low- and moderate-income individuals. This represented approximately 32 percent of allocated tier 1 capital for this AA. The OCC did not account for any prior period investments or uncommitted funds.

Broader Statewide or Regional Area

During prior periods, CBNA invested \$4.1 million in qualifying federal tax credits, a venture capital firm, and a community loan fund. They had approximately \$5,000 in unfunded commitments remaining from one of these investments. In addition, the OCC noted the bank had approximately \$1.2 million in prior period and \$365,000 in unfunded commitment investments to an SBIC and RBIP; however, the bank did not provide a breakout of investments between states served and the investments were not given significant consideration.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Burlington-South Burlington VT MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank’s performance under the Service Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Table 5: Distribution of Branch Delivery Systems													2024
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
<i>Full-Scope</i>													
VT Non MSA	50.1	17	58.6	0.0	17.6	64.7	17.6	0.0	0.0	12.7	64.8	22.0	0.5
<i>Limited-Scope</i>													
Burlington – South Burlington VT MSA	49.9	12	41.4	0.0	16.7	75.0	8.3	0.0	2.3	18.5	58.5	19.7	1.0
Total	100.0	29	100.0	0.0	17.2	69.0	13.8	0.0	0.9	14.9	62.3	21.1	0.7

Source: FFIEC File – 2020 and 2024 Census
1/1/2022 – 12/31/2024 Bank Data

Due to rounding, totals may not equal 100.0%

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

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. CBNA operated 17 branches in the AA including three branches located in moderate-income census tracts. The percentage of branches in moderate-income census tracts significantly exceeded the percentage of the population in moderate-income census tracts. There were no low-income census tracts in the AA.

Table 6: Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)				
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp	NA
<i>Full-Scope</i>							
Non MSA VT	0	1	0	0	-1	0	0
<i>Limited-Scope</i>							
Burlington – South Burlington VT MSA	0	0	0	0	0	0	0
Total	0	1	0	0	-1	0	0

1/1/2022-12/31/2024 Bank Data.

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

To the extent changes have been made, the institution’s opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. The only branch closure was in a middle-income census tract.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AAs, particularly moderate-income geographies and/or to low- and moderate-income individuals. The bank maintained standard business hours at all branch locations in the AA. The bank did not offer extended drive-through hours on Saturday for any branches in the AA.

Community Development Services

The institution provided a limited level of CD services. During the evaluation period, a total of five employees provided 96 service hours to five organizations. Bank personnel provided financial and banking expertise to one affordable housing organization and four community service organizations.

Examples of CD Services in the AA include:

- One employee provided financial expertise as a board member of a nonprofit that assists low- and moderate-income individuals with food, clothing, and housing assistance.
- One employee provided monthly financial literacy training education for a nonprofit organization that assists low- and moderate-income individuals seeking to purchase affordable housing.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Burlington-South Burlington VT AA was weaker than the bank's overall performance under the Service Test in the full-scope area. The weaker performance in the AA had minimal effect on the overall Service Test in the state of Vermont.

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 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
Massachusetts		
Springfield MA MSA #44140	Full-Scope	Hampden County (partial)
New York		
Albany-Schenectady-Troy NY MSA #10580	Limited-Scope	Albany, Rensselaer, and Schoharie Counties
Binghamton NY MSA #13780	Limited-Scope	Tioga County and a portion of Broome County
Buffalo-Cheektowaga NY MSA #15380	Full-Scope	Erie County
Elmira NY MSA #21300	Limited-Scope	Chemung County
Glens Falls NY MSA #24020	Limited-Scope	Portions of Warren and Washington counties
Ithaca NY MSA #27060	Limited-Scope	Tompkins County
Kingston NY MSA #28740	Limited-Scope	Ulster County (partial)
NY Non MSA	Full-Scope	Allegheny, Cattaraugus, Cayuga, Chautauqua, Chenango, Clinton, Columbia, Delaware, Essex, Franklin, Fulton, Lewis, Montgomery, Otsego, Schuylar, Seneca, St. Lawrence, and Steuben counties, and portions of Hamilton and Wyoming counties
Rochester NY MSA #40380	Full-Scope	Livingston, Monroe, Ontario, and Wayne counties
Syracuse NY MSA #45060	Full-Scope	Madison, Onondaga, and Oswego counties
Utica-Rome NY MSA #46540	Limited-Scope	Oneida County and a portion of Herkimer County
Watertown – Fort Drum NY MSA #48060	Limited-Scope	Jefferson County
Pennsylvania		
Allentown – Bethlehem- Easton PA MSA #10900	Limited-Scope	Carbon County (partial)
Scranton–Wilkes-Barre PA MSA #42540	Full-Scope	Lackawanna, Luzerne, and Wyoming counties
PA Non MSA	Limited-Scope	Susquehanna county and portions of Bradford and Schuylkill counties
Vermont		
Burlington – South Burlington VT MSA #15550	Limited-Scope	Chittenden, Franklin, and Grand Isle counties
VT Non MSA	Full-Scope	Bennington, Caledonia, Lamoille, Washington, Windham counties, and portions of Addison, Orange, Rutland, and Windsor counties

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
CBNA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State:				
Massachusetts	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
New York	Outstanding	High Satisfactory	Low Satisfactory	Outstanding
Pennsylvania	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Vermont	Outstanding	High Satisfactory	High Satisfactory	Outstanding

(*) 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		
Springfield MA MSA 2023	27	5,573	100.0	19,382	3.5	11.1	6.0	22.1	33.3	26.9	34.1	18.5	32.9	40.3	33.3	34.1	0.02	--	0.1		
Total	27	5,573	100.0	19,382	3.5	11.1	6.0	22.1	33.3	26.9	34.1	18.5	32.9	40.3	33.3	34.1	0.02	--	0.1		

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2023 Bank Data, 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		
Springfield MA MSA 2024	16	4,141	100.0	8,625	2.8	6.3	5.3	17.7	37.5	22.3	37.1	25.0	35.7	42.5	31.3	36.6	0.02	--	0.2		
Total	16	4,141	100.0	8,625	2.8	6.3	5.3	17.7	37.5	22.3	37.1	25.0	35.7	42.5	31.3	36.6	0.02	--	0.2		

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%

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
Albany-Schenectady-Troy NY MSA 2023	157	62,881	1.8	22,826	3.7	12.1	5.8	17.4	39.5	18.3	45.0	25.5	43.4	33.6	21.0	31.9	0.3	2.0	0.7
Binghamton NY MSA 2023	170	20,750	2.0	6,564	1.5	1.8	1.5	16.1	13.5	19.2	41.6	45.9	38.4	40.7	38.2	40.6	0.1	0.6	0.3
Buffalo-Cheektowaga NY MSA 2023	397	75,595	4.6	40,298	5.8	5.5	5.0	12.1	16.1	11.9	46.4	57.9	46.0	35.2	20.7	36.6	0.5	0.5	0.4
Elmira NY MSA 2023	238	29,453	2.8	3,373	6.6	7.6	5.3	11.4	16.8	13.8	60.3	52.5	56.8	21.8	23.1	24.1	--	--	--
Glens Falls NY MSA 2023	41	5,223	0.5	1,257	--	--	--	17.3	29.3	14.7	72.5	70.7	73.1	10.2	--	12.2	--	--	--
Ithaca NY MSA 2023	241	52,092	2.8	2,605	--	--	--	12.3	15.8	12.3	69.6	62.2	66.1	17.7	20.8	20.7	0.4	1.2	1.0
Kingston NY MSA 2023	7	1,177	0.1	413	--	--	--	34.7	14.3	28.6	65.3	85.7	71.4	--	--	--	--	--	--
NY Non MSA 2023	4,934	610,797	57.1	36,039	0.4	0.6	0.6	13.4	12.8	13.8	70.4	75.7	68.2	15.7	11.0	17.3	0.1	0.0	0.1
Rochester NY MSA 2023	825	149,644	9.55	55,721	4.1	3.2	5.4	15.1	24.5	15.8	47.8	63.0	45.5	32.9	9.3	33.1	0.2	--	0.2
Syracuse NY MSA 2023	741	107,907	8.58	27,747	2.3	1.9	2.6	15.6	20.7	16.3	49.5	56.4	47.7	32.2	20.9	33.0	0.4	0.1	0.5
Utica-Rome NY MSA 2023	452	84,796	5.23	9,437	3.5	0.7	3.8	13.9	9.5	13.1	51.4	66.4	51.0	29.8	23.5	30.9	1.4	--	1.3
Watertown-Fort Drum NY MSA 2023	432	66,724	5.00	4,992	--	--	--	12.2	8.8	14.1	58.7	62.0	59.7	29.1	29.2	26.2	--	--	0.0
Total	8,635	1,267,040	100.0	211,272	3.0	1.5	3.8	14.3	15.2	14.9	53.8	68.3	50.6	28.6	14.9	30.4	0.3	0.1	0.4

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
Albany-Schenectady-Troy NY MSA 2024	108	32,682	3.0	9,501	3.7	5.6	6.3	17.4	55.6	19.5	45.0	21.3	42.6	33.6	16.7	30.7	0.3	0.9	0.8
Binghamton NY MSA 2024	88	13,151	2.4	2,873	1.5	2.3	1.8	16.1	14.8	16.8	41.6	48.9	47.4	40.7	34.1	33.5	0.1	--	0.5
Buffalo-Cheektowaga NY MSA 2024	240	39,030	6.6	16,758	5.8	10.8	6.0	12.1	17.1	12.3	46.4	53.8	45.6	35.2	17.9	35.7	0.5	0.4	0.4
Elmira NY MSA 2024	91	10,912	2.5	1,460	6.6	5.5	4.7	11.4	9.9	12.3	60.3	59.3	57.6	21.8	25.3	25.4	--	--	--
Glens Falls NY MSA 2024	24	3,881	0.7	557	--	--	1.1	17.3	37.5	7.8	72.5	62.5	72.0	10.2	--	19.2	--	--	--
Ithaca NY MSA 2024	97	19,298	2.7	1,110	--	--	--	12.3	9.3	11.6	69.6	73.2	68.9	17.7	16.5	18.8	0.4	1.0	0.6
Kingston NY MSA 2024	0	0	0.0	158	--	--	--	34.7	--	17.3	65.3	--	68.2	--	--	12.5	--	--	2.0
NY Non MSA 2024	2,184	271,016	60.1	15,393	0.4	0.8	0.6	12.8	12.2	13.3	70.8	76.1	69.9	16.0	10.9	16.2	0.1	--	0.1
Rochester NY MSA 2024	420	58,946	11.6	24,167	4.1	9.8	6.2	13.9	26.0	14.8	48.0	54.8	46.3	33.9	8.8	32.5	0.2	0.7	0.3
Syracuse NY MSA 2024	346	53,254	8.7	12,246	2.3	4.1	3.2	15.6	25.1	17.1	49.5	49.7	46.7	32.2	20.8	32.4	0.4	0.3	0.4
Utica-Rome NY MSA 2024	211	31,379	5.8	4,027	3.5	0.5	3.5	14.0	9.5	16.2	51.5	70.6	53.3	29.8	19.4	25.2	1.4	--	1.8
Watertown-Fort Drum NY MSA 2024	174	21,298	4.8	2,067	--	--	--	12.2	10.3	13.6	58.8	65.0	58.9	29.1	24.7	27.5	--	--	0.1
Total	3,983	554,846	100.0	90,294	3.0	28.8	4.3	13.9	16.1	15.0	54.0	66.8	50.6	28.8	14.1	29.6	0.3	0.2	0.4

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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Allentown-Bethlehem-Easton PA MSA 2024	109	8,393	6.1	3,530	6.3	22.0	7.1	57.2	43.1	52.6	36.5	34.9	40.3	--	--	--	--	--	--	
PA Non MSA 2024	178	21,643	9.9	3,533	--	--	--	10.3	7.3	14.0	82.9	88.8	77.6	6.8	3.9	8.4	--	--	--	
Scranton-Wilkes-Barre PA MSA 2024	1,512	247,508	84.1	36,948	1.3	2.8	1.5	18.1	23.9	21.4	52.0	48.4	47.9	28.5	24.8	28.9	0.2	0.1	0.2	
Total	1,799	277,543	100.0	44,011	1.5	3.7	1.8	20.1	23.4	23.3	54.3	51.5	49.7	23.9	21.2	25.0	0.1	0.1	0.2	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Burlington-South Burlington VT MSA 2024	398	185,316	37.1	16,109	1.1	1.0	1.3	14.8	15.1	17.6	67.1	67.6	64.8	16.8	14.1	16.0	0.2	2.3	0.3	
VT Non MSA 2024	675	105,484	62.9	21,579	--	--	--	11.3	14.1	10.6	66.1	72.3	65.0	22.2	13.6	22.9	0.3	--	1.6	
Total	1,073	290,800	100.0	37,688	0.4	0.4	0.6	12.6	14.5	13.6	66.5	70.6	64.9	20.3	13.8	20.0	0.3	0.8	1.0	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 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	
Springfield MA MSA 2023	27	5,573	100.0	19,382	27.2	--	8.4	17.0	29.6	27.6	18.1	22.2	25.3	37.7	33.3	24.9	--	14.8	13.9	
Total	27	5,573	100.0	19,382	27.2	--	8.4	17.0	29.6	27.6	18.1	22.2	25.3	37.7	33.3	24.9	--	14.8	13.9	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
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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	
Springfield MA MSA 2024	16	4,141	100.0	8,625	25.1	--	4.7	16.3	37.5	19.1	17.5	18.8	28.4	41.1	43.8	31.8	--	--	16.1	
Total	16	4,141	100.0	8,625	25.1	--	4.7	16.3	37.5	19.1	17.5	18.8	28.4	41.1	43.8	31.8	--	--	16.1	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
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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
Albany-Schenectady-Troy NY MSA 2023	157	62,881	1.8	22,826	22.8	10.8	11.1	17.7	25.5	25.8	21.7	26.8	25.0	37.8	26.8	27.4	--	10.2	10.8
Binghamton NY MSA 2023	170	20,750	2.0	6,564	22.2	11.8	9.4	17.3	32.9	22.9	20.1	27.7	22.6	40.5	25.9	31.8	--	1.8	13.4
Buffalo-Cheektowaga NY MSA 2023	397	75,595	4.6	40,298	22.3	9.8	8.9	16.3	25.4	22.4	20.6	27.2	23.2	40.9	31.0	32.4	--	6.6	13.0
Elmira NY MSA 2023	238	29,453	2.8	3,373	23.4	13.0	11.6	15.7	31.1	23.8	21.8	26.1	23.8	39.1	24.0	28.3	--	5.9	12.5
Glens Falls NY MSA 2023	41	5,223	0.5	1,257	19.6	19.5	8.4	20.1	14.6	17.7	21.5	22.0	19.1	38.9	41.5	44.1	--	2.4	10.7
Ithaca NY MSA 2023	241	52,092	2.8	2,605	19.8	5.4	8.9	19.6	19.1	21.8	20.8	25.3	23.2	39.8	49.0	38.3	--	1.2	7.8
Kingston NY MSA 2023	7	1,177	0.1	413	21.3	--	4.1	25.0	--	11.6	15.8	42.9	13.3	37.8	57.1	63.9	--	--	7.0
NY Non MSA 2023	4,934	610,797	57.1	36,039	21.4	10.4	8.0	18.0	25.8	21.2	20.9	27.0	23.5	39.7	33.4	35.9	--	3.4	11.4
Rochester NY MSA 2023	825	149,644	9.6	55,721	21.0	18.4	10.2	17.7	32.6	22.0	20.6	26.2	22.1	40.8	20.4	31.0	--	2.4	14.7
Syracuse NY MSA 2023	741	107,907	8.6	27,747	21.9	11.3	10.6	17.4	24.2	22.7	20.6	28.6	23.9	40.1	30.1	32.3	--	5.8	10.8
Utica-Rome NY MSA 2023	452	84,796	5.2	9,437	21.9	10.2	9.7	16.3	23.2	21.8	21.7	25.9	24.9	40.2	34.7	32.9	--	6.0	10.8
Watertown-Fort Drum NY MSA 2023	432	66,724	5.0	4,992	20.4	7.9	4.4	18.5	20.4	19.7	21.3	25.0	25.1	39.9	40.3	36.7	--	6.5	14.1
Total	8,635	1,267,040	100.0	211,272	21.7	11.1	9.5	17.4	25.9	22.4	20.8	26.8	23.3	40.0	32.2	32.3	--	4.1	12.5

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
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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
Albany-Schenectady-Troy NY MSA 2024	108	32,682	3.0	9,501	22.8	5.6	9.7	17.7	24.1	24.7	21.7	19.4	24.3	37.8	45.4	27.8	--	5.56	13.5
Binghamton NY MSA 2024	88	13,151	2.4	2,873	22.2	6.8	10.4	17.3	19.3	21.9	20.1	30.7	22.0	40.5	43.2	29.8	--	--	15.9
Buffalo-Cheektowaga NY MSA 2024	240	39,030	6.6	16,758	22.3	6.3	8.8	16.3	30.4	21.3	20.6	30.4	23.3	40.9	30.4	32.8	--	2.5	13.8
Elmira NY MSA 2024	91	10,912	2.5	1,460	23.4	7.7	7.1	15.7	22.0	20.8	21.8	28.57	24.6	39.1	40.7	35.3	--	1.1	12.2
Glens Falls NY MSA 2024	24	3,881	0.7	557	19.6	--	6.5	20.1	41.7	15.8	21.5	25.0	18.9	38.9	33.3	39.0	--	--	19.9
Ithaca NY MSA 2024	97	19,298	2.7	1,110	19.8	8.3	12.3	19.6	18.5	18.9	20.8	27.8	22.6	39.8	44.3	38.8	--	1.0	7.4
Kingston NY MSA 2024	0	0	0.0	158	21.3	--	7.6	25.0	--	10.1	15.8	--	18.4	37.8	--	53.2	--	--	10.8
NY Non MSA 2024	2,184	271,016	60.1	15,393	21.3	7.9	7.1	17.9	25.4	20.8	20.9	26.2	22.9	40.0	36.8	36.9	--	3.8	12.3
Rochester NY MSA 2024	420	58,946	11.6	24,167	20.5	16.9	9.5	17.4	31.9	21.2	20.4	24.1	22.7	41.7	23.8	33.4	--	3.3	13.2
Syracuse NY MSA 2024	346	53,254	8.7	12,246	21.9	6.7	8.8	17.4	20.2	20.8	20.6	30.9	23.5	40.1	37.0	35.2	--	5.2	11.7
Utica-Rome NY MSA 2024	211	31,379	5.8	4,027	21.9	5.7	7.3	16.3	25.1	21.0	21.7	29.9	25.2	40.2	37.4	33.6	--	1.9	12.9
Watertown-Fort Drum NY MSA 2024	174	21,298	4.8	2,067	20.4	6.3	4.6	18.5	16.1	12.7	21.3	22.4	23.1	39.9	51.7	43.5	--	3.5	16.1
Total	3,983	554,846	100.0	90,294	21.6	8.3	8.7	17.4	25.2	21.2	20.8	26.7	23.2	40.3	36.4	33.8	--	3.5	13.1

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
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Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Allentown-Bethlehem-Easton PA MSA 2024	109	8,393	6.1	3,530	29.8	36.7	16.7	18.3	28.4	27.0	25.2	18.4	21.4	26.8	12.8	16.8	--	3.7	18.0	
PA Non MSA 2024	178	21,643	9.9	3,533	19.1	9.6	6.2	18.7	23.6	21.3	20.8	25.3	23.8	41.4	37.1	36.0	--	4.5	12.7	
Scranton-Wilkes-Barre PA MSA 2024	1,512	247,508	84.1	36,948	21.6	13.8	9.8	17.3	24.1	20.1	20.5	26.2	21.2	40.6	31.4	31.1	--	4.5	17.7	
Total	1,799	277,543	100.0	44,011	21.9	14.8	10.1	17.5	24.4	20.8	20.9	25.6	21.5	39.7	30.8	30.4	--	4.5	17.3	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2024	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Burlington-South Burlington VT MSA 2024	398	185,316	37.1	16,109	19.8	9.8	8.6	17.7	23.6	22.1	23.5	23.1	25.6	39.0	34.2	35.8	--	9.3	7.8	
VT Non MSA 2024	675	105,484	62.9	21,579	19.4	11.4	6.6	18.1	24.6	17.6	22.4	25.3	22.5	40.2	35.0	43.5	--	3.7	9.7	
Total	1,073	290,800	100.0	37,688	19.5	10.8	7.5	18.0	24.2	19.6	22.8	24.5	23.9	39.7	34.7	40.2	--	5.8	8.9	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 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
Springfield MA MSA 2023	28	9,227	100.0	16,610	14.9	17.9	12.0	28.8	46.4	27.5	24.6	21.4	26.5	31.0	14.3	33.7	0.8	--	0.4
Total	28	9,227	100.0	16,610	14.9	17.9	12.0	28.8	46.4	27.5	24.6	21.4	26.5	31.0	14.3	33.7	0.8	--	0.4

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
Springfield MA MSA 2024	6	1,705	100.0	--	13.4	--	--	22.8	--	--	29.9	83.3	--	33.1	16.7	--	0.7	--	--
Total	6	1,705	100.0	--	13.4	--	--	22.8	--	--	29.9	83.3	--	33.1	16.7	--	0.7	--	--

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 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
Albany-Schenectady-Troy NY MSA 2023	146	40,334	7.2	23,029	8.5	3.4	8.2	13.4	29.5	12.7	37.5	52.1	39.4	24.7	14.4	27.0	16.0	0.7	12.8
Binghamton NY MSA 2023	40	6,10	2.0	5,142	13.0	--	10.2	16.9	22.5	17.5	34.7	25.0	35.3	34.3	52.5	35.9	1.1	--	1.1
Buffalo-Cheektowaga NY MSA 2023	110	23,97	5.4	34,762	8.8	4.6	8.5	13.1	7.3	12.4	41.6	40.9	40.2	34.0	43.6	37.0	2.6	3.6	1.9
Elmira NY MSA 2023	70	10,869	3.5	2,030	19.3	14.0	14.0	17.5	17.1	19.1	42.1	51.4	44.2	21.2	17.1	22.7	--	--	--
Glens Falls NY MSA 2023	11	1,103	0.5	1,007	--	--	--	16.8	36.4	18.7	70.2	63.6	67.5	13.0	--	13.8	--	--	--
Ithaca NY MSA 2023	10	2,415	0.5	3,870	--	--	--	17.0	30.0	16.1	45.8	20.0	51.5	18.8	30.0	20.2	18.4	20.0	12.2
Kingston NY MSA 2023	2	52	0.1	515	--	--	--	33.8	--	37.7	66.3	100.0	62.3	--	--	--	--	--	--
NY Non MSA 2023	988	136,682	48.8	33,550	2.2	1.0	1.4	15.0	9.6	13.7	64.4	79.5	66.1	18.0	9.9	18.6	0.5	--	0.2
Rochester NY MSA 2023	227	32,094	11.2	38,417	6.3	0.9	5.0	16.4	18.5	15.1	42.7	70.5	45.4	31.8	10.1	32.7	2.8	--	1.8
Syracuse NY MSA 2023	169	30,696	8.4	22,432	7.0	0.6	5.2	15.1	22.5	16.0	43.3	49.7	45.2	28.4	24.3	29.5	6.3	3.0	4.1
Utica-Rome NY MSA 2023	112	20,901	5.5	7,711	8.6	1.8	6.8	12.1	10.7	12.0	43.7	51.8	42.6	26.8	33.0	32.7	8.8	2.7	5.9
Watertown-Fort Drum NY MSA 2023	139	20,591	6.9	3,510	--	--	--	24.7	10.8	18.7	48.5	55.4	55.0	26.2	33.8	26.4	0.6	--	--
Total	2,024	325,807	100.0	175,975	6.6	1.7	5.5	15.0	13.9	14.3	46.1	66.3	47.6	27.4	17.3	29.1	4.9	0.7	3.6

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%

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
Albany-Schenectady-Troy NY MSA 2024	64	17,687	11.6	--	7.0	6.3	--	12.9	20.3	--	34.5	57.8	--	22.6	14.1	--	23.0	1.6	--
Binghamton NY MSA 2024	9	1,843	1.6	--	13.7	--	--	17.2	--	--	34.1	44.4	--	34.0	55.6	--	1.0	--	--
Buffalo-Cheektowaga NY MSA 2024	22	5,408	4.0	--	9.3	--	--	13.4	13.6	--	41.4	59.1	--	33.4	27.3	--	2.5	--	--
Elmira NY MSA 2024	19	4,036	3.4	--	19.1	15.8	--	17.7	47.4	--	42.6	21.1	--	20.6	15.8	--	--	--	--
Glens Falls NY MSA 2024	2	910	0.4	--	--	--	--	16.6	50.0	--	69.9	50.0	--	13.5	--	--	--	--	--
Ithaca NY MSA 2024	3	872	0.5	--	--	--	--	17.8	33.3	--	45.5	33.3	--	18.8	33.3	--	17.9	--	--
Kingston NY MSA 2024	1	65	0.2	--	--	--	--	33.5	--	--	66.5	100.0	--	--	--	--	--	--	--
NY Non MSA 2024	278	40,300	50.3	--	2.1	2.5	--	14.6	10.8	--	64.5	77.0	--	18.3	9.7	--	0.5	--	--
Rochester NY MSA 2024	70	8,858	12.7	--	6.5	--	--	15.7	21.4	--	42.4	67.1	--	32.9	11.4	--	2.6	--	--
Syracuse NY MSA 2024	69	12,072	11.1	--	7.0	--	--	15.2	8.7	--	43.1	55.1	--	28.5	36.2	--	6.3	--	--
Utica-Rome NY MSA 2024	42	6,146	7.6	--	8.9	--	--	12.1	7.1	--	43.2	69.1	--	27.1	11.9	--	8.7	11.9	--
Watertown-Fort Drum NY MSA 2024	43	7,394	7.8	--	--	--	--	24.5	7.0	--	49.0	53.5	--	26.0	39.5	--	0.6	--	--
Total	622	93,519	100.0	--	6.6	2.3	--	14.7	13.5	--	45.5	66.2	--	27.3	17.0	--	6.0	1.0	--

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 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022 - 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	
Allentown-Bethlehem-Easton PA MSA 2024	21	2,747	3.6	1,331	7.6	4.8	3.5	51.5	61.9	51.5	40.9	33.3	45.1	--	--	--	--	--	--	
PA Non MSA 2024	93	15,275	16.0	2,183	--	--	--	12.9	2.2	7.7	79.5	97.9	78.9	7.6	--	13.4	--	--	--	
Scranton-Wilkes-Barre PA MSA 2024	466	78,911	80.3	19,847	4.9	1.5	3.8	24.2	18.0	22.0	43.8	54.3	44.9	26.7	21.7	28.9	0.3	4.5	0.4	
Total	580	96,933	100.0	23,361	4.7	1.4	3.4	24.7	17.1	22.3	46.8	60.5	48.1	23.6	17.4	25.8	0.3	3.6	0.3	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 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 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022 - 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	
Burlington-South Burlington VT MSA 2024	176	42,602	64.0	10,334	1.6	0.6	1.5	17.6	18.8	18.6	51.5	51.1	53.3	28.1	29.0	25.9	1.2	0.6	0.8	
VT Non MSA 2024	99	17,506	36.0	15,098	--	--	--	13.2	7.1	11.0	59.5	62.6	59.5	26.5	30.3	28.7	0.8	--	0.9	
Total	275	60,108	100.0	25,432	0.6	0.4	0.6	15.0	14.6	14.1	56.3	55.3	57.0	27.2	29.5	27.6	1.0	0.4	0.8	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 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												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	
Springfield MA MSA 2023	28	9,227	100.0	16,610	77.5	28.6	54.1	11.5	71.4	11.0	--	
Total	28	9,227	100.0	16,610	77.5	28.6	54.1	11.5	71.4	11.0	--	

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	
Springfield MA MSA 2024	6	1,705	100.0	--	76.7	33.3	--	11.5	66.7	11.8	--	
Total	6	1,705	100.0	--	76.7	33.3	--	11.5	66.7	11.8	--	

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
Albany-Schenectady-Troy NY MSA 2023	146	40,334	7.2	23,029	78.8	30.1	49.4	9.8	69.9	11.4	--
Binghamton NY MSA 2023	40	6,100	2.0	5,142	75.6	62.5	50.6	11.7	37.5	12.7	--
Buffalo-Cheektowaga NY MSA 2023	110	23,970	5.4	34,762	77.5	62.7	51.1	11.9	36.4	10.6	0.9
Elmira NY MSA 2023	70	10,869	3.5	2,030	71.0	61.4	53.5	11.9	38.6	17.1	--
Glens Falls NY MSA 2023	11	1,103	0.5	1,007	78.0	81.8	58.2	11.0	18.2	11.1	--
Ithaca NY MSA 2023	10	2,415	0.5	3,870	77.6	70.0	50.0	9.8	30.0	12.6	--
Kingston NY MSA 2023	2	52	0.1	515	81.7	50.0	58.5	9.3	50.0	9.0	--
NY Non MSA 2023	988	136,682	48.8	33,550	74.1	71.2	54.8	11.6	28.9	14.4	--
Rochester NY MSA 2023	227	32,094	11.2	38,417	78.5	76.7	52.0	11.2	23.4	10.3	--
Syracuse NY MSA 2023	169	30,696	8.4	22,432	76.4	63.9	52.2	11.4	36.1	12.2	--
Utica-Rome NY MSA 2023	112	20,901	5.5	7,711	76.0	58.0	51.1	11.6	42.0	12.4	--
Watertown-Fort Drum NY MSA 2023	139	20,591	6.9	3,510	70.1	72.7	48.6	12.5	27.3	17.4	--
Total	2,024	325,807	100.0	175,975	76.8	66.7	51.9	11.3	33.3	12.0	0.0

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%

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
Albany-Schenectady-Troy NY MSA 2024	64	17,687	11.6	--	80.2	31.3	--	8.4	68.8	11.3	--
Binghamton NY MSA 2024	9	1,843	1.6	--	75.8	22.2	--	10.9	77.8	13.2	--
Buffalo-Cheektowaga NY MSA 2024	22	5,408	4.0	--	77.9	40.9	--	11.1	59.1	11.0	--
Elmira NY MSA 2024	19	4,036	3.4	--	71.8	57.9	--	11.1	42.1	17.1	--
Glens Falls NY MSA 2024	2	910	0.4	--	78.4	100.0	--	10.4	--	11.2	--
Ithaca NY MSA 2024	3	872	0.5	--	77.3	66.7	--	9.6	33.3	13.1	--
Kingston NY MSA 2024	1	65	0.2	--	81.6	--	--	8.9	100.0	9.5	--
NY Non MSA 2024	278	40,300	50.3	--	74.5	64.4	--	11.0	35.6	14.5	--
Rochester NY MSA 2024	70	8,858	12.7	--	78.8	67.1	--	10.6	32.9	10.7	--
Syracuse NY MSA 2024	69	12,072	11.1	--	76.6	55.1	--	10.8	43.5	12.6	1.5
Utica-Rome NY MSA 2024	42	6,146	7.6	--	76.4	57.1	--	11.0	42.9	12.6	--
Watertown-Fort Drum NY MSA 2024	43	7,394	7.8	--	70.3	44.2	--	11.9	55.8	17.8	--
Total	622	93,519	100.0	--	77.3	56.8	--	10.5	43.1	12.2	0.2

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%

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
Allentown-Bethlehem-Easton PA MSA 2024	21	2,747	3.6	1,331	81.0	76.2	56.4	7.5	23.8	11.6	--
PA Non MSA 2024	93	15,275	16.0	2,183	79.8	32.3	53.0	9.0	67.7	11.1	--
Scranton-Wilkes-Barre PA MSA 2024	466	78,911	80.3	19,847	80.6	45.5	52.0	9.3	54.1	10.2	0.4
Total	580	96,933	100.0	23,361	80.5	44.5	52.4	9.1	55.2	10.3	0.3

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 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%

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
Burlington-South Burlington VT MSA 2024	176	42,602	64.0	10,334	82.4	39.7	51.1	9.1	60.2	8.5	--
VT Non MSA 2024	99	17,506	36.0	15,098	80.7	74.8	50.2	9.5	25.3	9.8	--
Total	275	60,108	100.0	25,432	81.4	52.4	50.6	9.3	47.6	9.3	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2022 - 2023

Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Albany-Schenectady-Troy NY MSA 2023	1	218	0.3	197	2.0	--	0.5	21.6	--	46.2	45.5	100.0	37.1	26.6	--	15.7	4.3	--	0.5
Binghamton NY MSA 2023	8	897	2.2	62	2.8	--	--	6.2	--	8.2	49.8	100.0	79.4	40.8	--	20.6	0.5	--	--
Buffalo-Cheektowaga NY MSA 2023	19	2,094	5.1	301	4.1	--	1.7	8.7	5.3	7.3	46.6	79.0	61.5	39.9	15.8	29.2	0.8	--	0.3
Elmira NY MSA 2023	1	216	0.3	19	2.9	--	--	8.8	--	--	73.5	100.0	100.0	14.7	--	--	--	--	--
Glens Falls NY MSA 2023	2	42	0.5	13	--	--	--	21.3	--	--	72.1	100.0	84.6	6.6	--	15.4	--	--	--
Ithaca NY MSA 2023	4	310	1.1	67	--	--	--	15.3	25.0	20.9	68.9	75.0	73.1	14.8	--	6.0	1.0	--	--
Kingston NY MSA 2023	0	0	0.0	10	--	--	--	26.9	--	30.0	73.1	--	70.0	--	--	--	--	--	--
NY Non MSA 2023	192	16,941	51.6	1,935	0.2	--	0.1	9.7	6.8	7.65	73.7	89.6	79.3	16.3	3.7	13.0	0.1	--	0.1
Rochester NY MSA 2023	112	11,937	30.1	1,053	1.8	--	--	14.1	8.0	15.1	56.6	92.0	72.3	26.8	--	12.6	0.6	--	--
Syracuse NY MSA 2023	9	507	2.4	358	2.0	--	0.8	14.6	11.1	15.1	53.7	88.9	60.6	29.4	--	22.9	0.4	--	0.6
Utica-Rome NY MSA 2023	11	397	3.0	116	1.1	--	--	7.6	--	5.17	59.6	63.6	48.3	30.9	36.4	46.6	0.8	--	--
Watertown-Fort Drum NY MSA 2023	13	819	3.5	110	--	--	--	8.2	--	0.9	64.3	84.6	79.1	27.6	15.4	20.0	--	--	--
Total	372	34,378	100.0	4,242	1.5	--	0.2	12.1	6.7	11.7	60.7	89.0	71.9	25.0	4.3	16.0	0.8	--	0.1

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%

Assessment Area:	Total Loans to Farm			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Albany-Schenectady-Troy NY MSA 2024	1	17	0.7	--	2.2	--	--	21.8	100.0	--	43.4	--	--	25.7	--	--	6.9	--	--
Binghamton NY MSA 2024	4	349	2.7	--	2.4	--	--	6.8	--	--	50.2	75.0	--	40.0	25.0	--	0.5	--	--
Buffalo-Cheektowaga NY MSA 2024	4	967	2.7	--	4.9	--	--	9.1	25.0	--	46.6	75.0	--	38.8	--	--	0.5	--	--
Elmira NY MSA 2024	1	50	0.7	--	2.0	--	--	6.9	--	--	75.3	--	--	15.8	100.0	--	--	--	--
Glens Falls NY MSA 2024	0	0	0.0	--	--	--	--	23.8	--	--	69.8	--	--	6.4	--	--	--	--	--
Ithaca NY MSA 2024	1	40	0.7	--	--	--	--	15.9	--	--	68.7	100.0	--	14.4	--	--	1.0	--	--
Kingston NY MSA 2024	0	0	0.0	--	--	--	--	26.1	--	--	73.9	--	--	--	--	--	--	--	--
NY Non MSA 2024	86	8,468	58.1	--	0.2	--	--	9.2	9.3	--	73.8	84.9	--	16.7	5.8	--	0.1	--	--
Rochester NY MSA 2024	43	5,743	29.1	--	0.9	--	--	10.6	18.6	--	67.7	74.4	--	20.6	7.0	--	0.3	--	--
Syracuse NY MSA 2024	3	90	2.0	--	2.1	--	--	14.6	--	--	52.8	66.7	--	30.2	33.3	--	0.3	--	--
Utica-Rome NY MSA 2024	3	64	2.0	--	1.1	--	--	8.0	--	--	58.4	66.7	--	31.7	33.3	--	0.8	--	--
Watertown-Fort Drum NY MSA 2024	5	587	3.4	--	--	--	--	7.9	--	--	66.5	60.0	--	25.7	40.0	--	--	--	--
Total	151	16,375	100.0	--	1.7	--	--	11.9	11.9	--	60.3	78.8	--	25.2	9.3	--	1.0	--	--

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%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albany-Schenectady-Troy NY MSA 2023	1	218	0.3	197	93.2	100.0	60.9	6.3	--	0.5	--
Binghamton NY MSA 2023	8	897	2.2	62	91.9	100.0	58.7	8.1	--	--	--
Buffalo-Cheektowaga NY MSA 2023	19	2,094	5.1	301	88.5	47.4	46.5	10.2	52.6	1.4	--
Elmira NY MSA 2023	1	216	0.3	19	91.2	--	63.2	7.8	100.0	1.0	--
Glens Falls NY MSA 2023	2	42	0.5	13	88.5	100.0	38.5	9.8	--	1.6	--
Ithaca NY MSA 2023	4	310	1.1	67	84.2	100.0	59.7	14.3	--	1.5	--
Kingston NY MSA 2023	0	0	0.0	10	96.2	--	80.0	3.9	--	--	--
NY Non MSA 2023	192	16,941	51.6	1,935	88.3	87.0	50.5	10.8	13.0	0.8	--
Rochester NY MSA 2023	112	11,937	30.1	1,053	86.9	77.7	55.6	11.6	22.3	1.5	--
Syracuse NY MSA 2023	9	507	2.4	358	86.5	88.9	48.3	11.5	11.1	2.0	--
Utica-Rome NY MSA 2023	11	397	3.0	116	89.3	90.9	51.7	8.4	9.1	2.3	--
Watertown-Fort Drum NY MSA 2023	13	819	3.5	110	83.7	84.6	27.3	14.8	15.4	1.5	--
Total	372	34,378	100.0	4,242	88.3	82.5	51.6	10.5	17.5	1.2	--

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%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albany-Schenectady-Troy NY MSA 2024	1	17	0.7	--	93.7	100.0	--	5.9	--	0.5	--
Binghamton NY MSA 2024	4	349	2.7	--	91.7	75.0	--	7.8	25.0	0.5	--
Buffalo-Cheektowaga NY MSA 2024	4	967	2.7	--	89.4	--	--	9.3	100.0	1.3	--
Elmira NY MSA 2024	1	50	0.7	--	93.1	100.0	--	6.9	--	--	--
Glens Falls NY MSA 2024	0	0	0.0	--	87.3	--	--	9.5	--	3.2	--
Ithaca NY MSA 2024	1	40	0.7	--	82.6	100.0	--	15.9	--	1.5	--
Kingston NY MSA 2024	0	0	0.0	--	95.7	--	--	4.4	--	--	--
NY Non MSA 2024	86	8,468	58.1	--	89.1	81.4	--	10.1	18.6	0.9	--
Rochester NY MSA 2024	43	5,743	29.1	--	87.4	79.1	--	11.2	20.9	1.5	--
Syracuse NY MSA 2024	3	90	2.0	--	87.4	100.0	--	10.8	--	1.8	--
Utica-Rome NY MSA 2024	3	64	2.0	--	89.5	100.0	--	8.3	--	2.2	--
Watertown-Fort Drum NY MSA 2024	5	587	3.4	--	84.8	40.0	--	13.6	60.0	1.6	--
Total	151	16,375	100.0	--	88.9	78.2	--	9.9	21.9	1.2	--

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%