



## PUBLIC DISCLOSURE

June 03, 2024

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Bank of Coxsackie  
Charter Number 1398

3-7 Reed Street  
Coxsackie, NY 12051

Office of the Comptroller of the Currency

91 Fieldcrest Avenue  
Suite A-30  
Edison, NJ 08837

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

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## **Overall CRA Rating**

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

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

**The Community Development Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on the state rating. The primary factors in the Satisfactory rating are the reasonable geographic distribution of loans and the reasonable borrower distribution of loans in the institution's assessment areas (AAs).
- The Community Development (CD) Test rating is based on the state rating. The primary factors in the Outstanding rating are the level of CD lending and CD services which reflect excellent responsiveness to the CD needs of the institution's AAs.

### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is reasonable. The bank's quarterly average LTD ratio during the evaluation period was 76.10 percent and ranged from a quarterly low of 66.26 percent on September 30, 2021 to a quarterly high of 90.55 percent on June 30, 2023. The OCC compared the bank's LTD ratio to four similarly situated banks in Albany, Schoharie, Schenectady, and Saratoga Counties with total asset sizes ranging from \$178 million to \$821 million. The quarterly average LTD ratio of these banks over the same period was 70.64 percent. The ratios ranged from a low of 48.01 percent to a high of 87.14 percent.

### **Lending in Assessment Area**

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

The bank originated and purchased 52.1 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.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	452	52.1	416	47.9	868	100,938	48.9	105,413	51.1	206,351
Total	452	52.1	416	47.9	868	100,938	48.9	105,413	51.1	206,351

## Description of Institution

National Bank of Coxsackie (NBC) is a community bank headquartered in Coxsackie, NY. The bank was founded in 1852 and established as a national charter in 1865. NBC does not have any affiliates. There was no merger activity during the evaluation period.

NBC operates eight full-service branches and seven deposit-taking automated teller machines (ATMs) in Upstate New York. The bank has five branches including its main office in Greene County, two branches in Albany County, and one branch in Schoharie County. During the evaluation period, NBC did not open or close any branches, but the bank opened a loan production office in Latham, Albany County in 2023.

NBC offers a full range of retail and commercial products. Lending products include residential mortgages, commercial mortgages, business loans, and consumer loans. Deposit products include various checking accounts, savings accounts, and certificates of deposit. Alternate delivery systems include ATMs, online banking with bill pay and Zelle, and mobile banking.

As of December 31, 2023, NBC reported total assets of \$545.6 million, \$433.9 million in deposits, and \$45.9 million in tier 1 capital. Net loans and leases totaled \$383.3 million, representing 70 percent of total assets. The loan portfolio primarily consists of real estate loans, which totaled \$369.7 million or 96 percent of net loans. The remaining portfolio was composed of commercial loans and individual loans at 2 percent of net loans each. Of the real estate loans, 68 percent were 1-4 family residential, 22 percent were commercial real estate, 5 percent were multifamily, 4 percent were construction, and 1 percent or less was farmland.

NBC has two AAs: the Greene County Non-Metropolitan Statistical Area (MSA) AA and the Albany and Schoharie Counties AA. Albany and Schoharie Counties are part of the Albany-Schenectady-Troy MSA. The Greene County Non-MSA AA consists of all of Greene County, and NBC made no changes to this AA during the evaluation period. However, during 2021, the Albany and Schoharie Counties AA included all of Schoharie County and only part of Albany County. In 2022, NBC adjusted the Albany and Schoharie Counties AA to include both counties in their entirety.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. NBC was rated Satisfactory during the previous CRA Performance Evaluation dated June 11, 2021.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

NBC's CRA evaluation period ranged from January 1, 2021 through December 31, 2023. For the Lending Test, lending for the entire evaluation period was used to conclude on geographic distribution and borrower distribution of loans. However, the bank's performance in 2021 was assessed separately from its performance in 2022-2023 due to both adjustments to income categorization and census tract designation following the results of the 2020 U.S. Census and the bank's change to the Albany and Schoharie Counties AA.

To evaluate the bank's lending performance, OCC examiners reviewed home mortgage loans, which was the primary loan product during the evaluation period. The primary lending product was determined based on the bank's overall business strategy and the volume of home mortgage loans originated or purchased during the evaluation period.

The evaluation period for CD loans, investments, and services also ranged from January 1, 2021 through December 31, 2023.

### **Selection of Areas for Full-Scope Review**

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

### **Ratings**

The bank's overall rating is based on the rating for the state of New York, the bank's only rating area.

For the Lending Test, more weight was given to the bank's performance for 2022-2023 as a majority of the loans by number and dollar amount were originated during that time period. The bank originated 346 home mortgage loans totaling \$79 million in 2021 and originated 522 home mortgage loans totaling \$127 million in the 2022-2023 time period.

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 the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## **State Rating**

### **State of New York**

#### **CRA rating for the State of New York:**

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

**The Community Development Test is rated:** Outstanding.

The major factors that support this rating include:

- The bank originated or purchased a majority of its primary lending product, home mortgage loans, inside the bank's AAs. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of the census tract.
- The distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to individuals of different income levels is reasonable.
- The bank's CD lending activity reflects excellent responsiveness in the AAs.
- The bank's level of qualified investments and donations in its AAs was limited.
- The bank's CD services provided an excellent level of CD services in its AAs.

## Description of Institution's Operations in New York

NBC has two AAs within the state of New York: the Greene County Non-MSA AA and the Albany and Schoharie Counties AA. The AAs are comprised of whole counties and appropriately include geographies where NBC maintains its main office and branch locations. AA delineations do not reflect illegal discrimination and do not arbitrarily exclude any low- or moderate-income (LMI) areas.

### Greene County Non-MSA AA

Per the 2020 U.S. Census data, the Greene County Non-MSA AA contains 18 census tracts: one low-income, one moderate-income, 11 middle-income, four upper-income, and one that has not been assigned an income classification. NBC offers their full range of products and services through five branches and four ATMs located throughout the AA. According to the June 30, 2023 Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report, NBC had \$290.6 million in deposits in the Greene County Non-MSA AA, which accounts for 72.8 percent of NBC's bank-wide deposits. Consistent with the bank's overall lending focus, the primary lending focus in the Greene County Non-MSA AA was home mortgage loans.

NBC operates in a highly competitive financial services market, competing for both deposits and loans. According to the FDIC Deposit Market Share Report as of June 30, 2023, NBC had a deposit market share of 8.8 percent in the Greene County Non-MSA AA, ranking third out of seven institutions. The bank faces strong competition for deposits from other regional and community banks in the AA. Primary competitors in the AA include The Bank of Greene County with 51.1 percent market share and Greene County Commercial Bank with 31.2 percent market share.

With respect to residential mortgage loans, based on 2022 Peer Mortgage Data, there were 168 reporting lenders in the AA. The top three mortgage lenders in the AA have a combined total market share of 28.6 percent and include Homestead Funding Corp., The Bank of Greene County, and JPMorgan Chase Bank, N.A. NBC ranked fourth in the AA with a market share of 5.3 percent.

Lending opportunities in LMI geographies are limited and challenging to LMI individuals within the Greene County Non-MSA AA. There is only one low-income geography and only one moderate-income geography within the AA. Owner-occupied housing is limited with only 474 units in the low-income census tract and 636 units in the moderate-income census tract. The OCC considered housing costs in relation to the median family income in the AA, which limited the affordability for LMI borrowers. Based on the 2023 median family income (MFI), low-income families earned less than \$34,511 and moderate-income families earned up to \$55,217 in the AA. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$862 for low-income borrowers and \$1,380 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowners' insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value of \$197,601 would be \$1,061 in the AA. This illustrates that housing is

unaffordable for low-income borrowers and moderate-income borrowers would be challenged to afford a mortgage loan in this AA.

As of December 31, 2023, the unemployment rate in Greene County was 4.2 percent, above the national unemployment rate of 3.7 percent and near the state unemployment rate of 4.4 percent. Additionally, 8.9 percent of families in the AA live below the poverty level.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022-2023 Greene Non-MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	18	5.6	5.6	61.1	22.2	5.6
Population by Geography	47,931	3.7	5.3	63.1	23.4	4.5
Housing Units by Geography	29,746	3.2	4.4	70.9	21.5	0.0
Owner-Occupied Units by Geography	13,550	3.5	4.7	66.8	25.1	0.0
Occupied Rental Units by Geography	4,131	9.9	11.4	49.5	29.2	0.0
Vacant Units by Geography	12,065	0.7	1.6	82.8	14.9	0.0
Businesses by Geography	5,217	5.4	8.2	64.3	21.9	0.2
Farms by Geography	209	2.4	1.4	72.2	23.9	0.0
Family Distribution by Income Level	10,701	21.2	13.4	20.0	45.4	0.0
Household Distribution by Income Level	17,681	24.9	14.9	15.9	44.3	0.0
Median Family Income Non-MSAs - NY		\$69,021	Median Housing Value			\$197,601
			Median Gross Rent			\$914
			Families Below Poverty Level			8.9%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2021 Greene Non-MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	15	0.0	6.7	60.0	26.7	6.7
Population by Geography	48,312	0.0	9.2	58.6	26.7	5.4



Housing Units by Geography	29,276	0.0	8.0	70.2	21.9	0.0
Owner-Occupied Units by Geography	13,261	0.0	6.8	61.9	31.3	0.0
Occupied Rental Units by Geography	4,373	0.0	20.9	60.7	18.4	0.0
Vacant Units by Geography	11,642	0.0	4.5	83.2	12.4	0.0
Businesses by Geography	3,747	0.0	15.9	61.4	22.4	0.2
Farms by Geography	163	0.0	2.5	54.6	42.9	0.0
Family Distribution by Income Level	11,541	19.2	16.0	20.6	44.2	0.0
Household Distribution by Income Level	17,634	22.1	15.8	17.7	44.4	0.0
Median Family Income Non-MSAs - NY	\$59,570	Median Housing Value			\$184,871	
		Median Gross Rent			\$810	
		Families Below Poverty Level			9.8%	
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Albany and Schoharie Counties AA

Albany and Schoharie Counties are part of the Albany-Schenectady-Troy MSA. Per the 2020 U.S. Census data, the Albany and Schoharie Counties AA contains 93 census tracts: 10 low-income, 21 moderate-income, 31 middle-income, 27 upper-income, and four that have not been assigned an income classification. NBC offers their full range of products and services through three branches, three ATMs, and a loan production office located in the AA. According to the June 30, 2023 FDIC Summary of Deposits Report, NBC had \$108.5 million in deposits in the Albany and Schoharie Counties AA, which accounts for 27.2 percent of NBC's bank-wide deposits. Consistent with the bank's overall lending focus, the primary lending focus in the Albany and Schoharie Counties AA was home mortgage loans.

The Albany and Schoharie County AA banking environment is also highly competitive. According to the FDIC Deposit Market Share Report as of June 30, 2023, NBC had a deposit market share of 0.4 percent in the Albany and Schoharie Counties AA, ranking 16<sup>th</sup> out of 22 institutions. Significant competitors for deposits include large regional and national banks such as Citizens Bank, N.A., KeyBank N.A., and Bank of America, N.A. These institutions have a combined deposit market share of 72.3 percent.

With respect to residential mortgage loans, based on 2022 Peer Mortgage Data, there were 216 reporting lenders in the AA. The top three mortgage lenders in the AA have a combined total market share of 30.2 percent and include Broadview Federal Credit Union, SEFCU Services,

LLC, and Homestead Funding Corp. NBC ranked 17<sup>th</sup> in the AA with a market share of 1.4 percent.

The unemployment rate in Albany and Schoharie Counties as of December 31, 2023 was 3.7 percent, similar to the national unemployment rate of 3.7 percent and below the state unemployment rate of 4.4 percent. Additionally, 7.1 percent of families in the AA live below the poverty level.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022-2023 Albany Schoharie AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	93	10.8	22.6	33.3	29.0	4.3
Population by Geography	344,562	9.6	23.0	33.4	31.1	3.0
Housing Units by Geography	159,779	10.7	26.5	32.2	29.0	1.5
Owner-Occupied Units by Geography	81,459	3.1	21.0	37.4	38.2	0.2
Occupied Rental Units by Geography	59,443	18.7	28.8	26.8	22.6	3.2
Vacant Units by Geography	18,877	18.0	43.0	27.1	10.0	2.0
Businesses by Geography	61,723	5.7	12.2	28.6	22.5	31.0
Farms by Geography	1,139	2.2	26.3	35.7	27.4	8.4
Family Distribution by Income Level	79,360	23.2	17.5	20.8	38.5	0.0
Household Distribution by Income Level	140,902	26.3	17.3	17.3	39.2	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$95,438	Median Housing Value			\$206,410
			Median Gross Rent			\$1,041
			Families Below Poverty Level			7.1%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2021 Albany Schoharie AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	22	0.0	18.2	59.1	18.2	4.5
Population by Geography	90,899	0.0	19.2	51.4	28.1	1.4
Housing Units by Geography	43,001	0.0	22.1	53.1	24.8	0.0
Owner-Occupied Units by Geography	27,979	0.0	20.0	51.0	29.0	0.0
Occupied Rental Units by Geography	7,509	0.0	18.2	54.8	27.0	0.0
Vacant Units by Geography	7,513	0.0	34.1	58.9	7.0	0.0
Businesses by Geography	6,640	0.0	14.3	52.1	33.4	0.3
Farms by Geography	473	0.0	28.5	58.1	13.1	0.2
Family Distribution by Income Level	23,647	16.8	18.2	22.4	42.6	0.0
Household Distribution by Income Level	35,488	20.2	15.3	18.6	45.8	0.0
Median Family Income MSA - 10580 Albany- Schenectady-Troy, NY MSA		\$81,103	Median Housing Value			\$199,769
			Median Gross Rent			\$898
			Families Below Poverty Level			5.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

To assist in determining local economic conditions and community needs, the OCC obtained information from four community contacts serving the bank's AAs. The contacts included a community meeting session, local government, social service organizations, and non-profits focused on economic development. A majority of contacts indicated a need for affordable housing and more affordable credit products for homeowners and small businesses. One contact noted a strong need for credit building products and down payment assistance programs to make homes more accessible. Another contact indicated a need for more favorable loan terms for small businesses and better credit products to allow businesses to own property versus renting.

## **Scope of Evaluation in New York**

The rating for the state of New York is based on full-scope reviews of the bank's two AAs: the Greene County Non-MSA AA and the Albany and Schoharie Counties AA. The bank's performance in the Greene County Non-MSA AA was given the most weight when arriving at the state rating area conclusion as it includes five of the eight branch offices and accounted for 73 percent of deposits. The AA demographic data changed over the course of the evaluation period following the availability of data from the 2020 U.S. Census, effective January 1, 2022. The change in the demographic data requires a separate analysis of the bank's performance for the year 2021 and the years 2022-2023.

## **Conclusions with Respect to Performance Tests in New York**

### **Lending Test**

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

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's lending performance in the state of New York is reasonable.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits reasonable geographic distribution of loans in the state.

#### ***Home Mortgage Loans***

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

#### **Greene County Non-MSA AA**

The geographic distribution of home mortgage loans is reasonable.

#### **Home Mortgage Loans 2021**

The bank's level of home mortgage loans in moderate-income geographies was near to both the demographic data and aggregate performance. In 2021, there were no low-income geographies in the AA.

#### **Home Mortgage Loans 2022-2023**

The bank's level of home mortgage loans in low-income geographies was near to both the demographic data and aggregate performance. The bank's level of home mortgage loans in

moderate-income geographies was near to the demographic data and equal to the aggregate performance.

### **Albany and Schoharie Counties AA**

The geographic distribution of home mortgage loans is excellent.

#### *Home Mortgage Loans 2021*

The bank's level of home mortgage loans in moderate-income geographies was significantly above both the demographic data and aggregate performance. In 2021, there were no low-income geographies in the AA.

#### *Home Mortgage Loans 2022-2023*

The bank's level of home mortgage loans in low-income geographies significantly exceeded both the demographic data and aggregate performance. The bank's level of home mortgage loans in moderate-income geographies was significantly above both the demographic data and aggregate performance.

### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps to analyze home mortgage lending activity to identify any gaps in the geographic distribution of loans in the AAs. The OCC did not identify any unexplained conspicuous gaps in the areas reviewed.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels.

#### ***Home Mortgage Loans***

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

### **Greene County Non-MSA AA**

The borrower distribution of home mortgage loans is reasonable.

#### *Home Mortgage Loans 2021*

The bank's level of home mortgage loans to low-income borrowers was well below the demographic data but above aggregate performance. Aggregate lenders were similarly well below the percentage of low-income families. The MHV in the AA impedes mortgage lending opportunities to low-income borrowers given the MHV is more than four times the maximum income level for these borrowers. The bank's level of home mortgage loans to moderate-income borrowers was near to the demographic data and above the aggregate performance.

Home Mortgage Loans 2022-2023

The bank's level of home mortgage loans to low-income borrowers was well below the demographic data and below the aggregate performance. Aggregate lenders were similarly well below the percentage of low-income families. The MHV in the AA impedes mortgage lending opportunities to low-income borrowers given the MHV is more than four times the maximum income level for these borrowers. The bank's level of home mortgage loans to moderate-income borrowers was near to the demographic data and above the aggregate performance.

**Albany and Schoharie Counties AA**

The borrower distribution of home mortgage loans is reasonable.

Home Mortgage Loans 2021

The bank's level of home mortgage loans to low-income borrowers was well below the demographic data and below the aggregate performance. Aggregate lenders were similarly well below the percentage of low-income families. The bank's level of home mortgage loans to moderate-income borrowers was significantly above the demographic data and above the aggregate performance.

Home Mortgage Loans 2022-2023

The bank's level of home mortgage loans to low-income borrowers was well below the demographic data and near to the aggregate performance due to housing affordability in the AA. Aggregate lenders were similarly well below the percentage of low-income families. The bank's level of home mortgage loans to moderate-income borrowers was near to the demographic data but well below the aggregate performance. Aggregate lenders exceeded the percentage of moderate-income families.

**Responses to Complaints**

The bank did not receive any CRA-related complaints during the evaluation period.

**Community Development Test**

The bank's performance under the Community Development Test in the state of New York is rated Outstanding.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the AAs.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Greene County	2	5.0	400	4.7
Albany and Schoharie Counties	38	95.0	8,172	95.3

During the evaluation period, NBC originated 40 CD loans inside the bank's AAs totaling \$8.6 million or 18.7 percent of tier 1 capital. The bank's CD lending focused on providing affordable housing for LMI individuals particularly in the form of multifamily rental housing. Affordable housing is an identified credit need in both AAs.

As shown in the above table, NBC originated most of the CD loans in the Albany and Schoharie Counties AA, totaling \$8.2 million or 17.8 percent of tier 1 capital. In the Greene County Non-MSA AA, NBC originated CD loans totaling \$400,000 or .87 percent of tier 1 capital. However, there are limited CD lending opportunities in the Greene County Non-MSA AA as it is a rural area with a total of 29,746 housing units, a population of 47,931, and only nine percent of the population are LMI individuals. There is only one low-income geography and only one moderate-income geography within the AA. The Albany and Schoharie Counties AA includes the city of Albany and has a total of 159,779 housing units, more than five times the number of units in Greene County, a population of 344,562, and 33 percent of the population are LMI individuals. There are 31 LMI geographies in the AA.

In the Greene County Non-MSA AA, the bank originated two CD loans:

- The bank provided a \$100,000 line of credit to an organization that provides community services to LMI individuals such as food assistance and youth programs.
- The bank provided a \$300,000 line of credit to be used for the purchase and renovation of properties which will provide affordable housing rental units to LMI individuals.

In the Albany and Schoharie Counties AA, the 38 CD loans financed multifamily rental properties with affordable housing units.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Greene County			33	16	33	54.1	16	23.2		
Albany and Schoharie Counties			21	21	21	34.4	21	30.4		
Regional			7	32	7	11.5	32	46.4		
<b>Total</b>			<b>61</b>	<b>69</b>	<b>61</b>	<b>100.0</b>	<b>69</b>	<b>100.0</b>		

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

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

The bank's level of qualified investments and donations in its AAs was limited. During the evaluation period, NBC made 61 donations with a CD purpose, totaling \$69,400. The dollar volume of donations represented 0.15 percent of tier 1 capital. NBC did not make any CD investments.

NBC's donations were equally distributed between both AAs. The donations were mainly to organizations that provide community services for LMI individuals including shelter, food assistance, job assistance, healthcare, youth programs, and scholarships. The bank also donated to an organization that provides affordable housing units and credit counseling for LMI individuals.

### Extent to Which the Bank Provides Community Development Services

Bank employees and officers completed service activity with approximately 25 qualifying CD organizations, held leadership positions, provided financial expertise, and volunteered their time. The organizations provide affordable housing, promote economic development, and provide community services to LMI individuals such as domestic violence services, safe shelter, youth programs, and financial literacy programs. In total, employees donated approximately 3,000 hours of CD services.

In the Greene County Non-MSA AA, examples of CD services include:

- One bank employee serves as a board member for an organization funding local organizations that promote economic development and community services for LMI individuals such as health care and youth programs.
- One bank officer serves as a board member for an organization that promotes economic development by providing loans to businesses that create jobs for LMI individuals.



- One bank officer serves as a board member for an organization that provides youth programs for LMI individuals.

In the Albany and Schoharie Counties AA, examples of CD services include:

- One bank employee serves as a board member and treasurer for an organization that provides affordable housing units and credit counseling for LMI individuals.
- One bank employee serves as a board member for an organization that provides health care, housing, and youth programs for LMI individuals.
- One bank employee serves as a board member for an organization that provides domestic violence services, safe shelter, and affordable housing services to LMI individuals.

## 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 metropolitan and nonmetropolitan areas 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”).

<b>Time Period Reviewed:</b>	01/01/21 to 12/31/23	
<b>Bank Products Reviewed:</b>	Home mortgage loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>New York</b>		
Greene County Non-MSA AA	Full-scope	Greene County
Albany and Schoharie Counties AA	Full-scope	Albany and Schoharie Counties are part of the Albany-Schenectady-Troy MSA #10580i

## Appendix B: Summary of State Ratings

<b>RATINGS - NBC</b>			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
<b>NBC</b>	<b>Satisfactory</b>	<b>Outstanding</b>	<b>Satisfactory</b>
State:			
<b>New York</b>	<b>Satisfactory</b>	<b>Outstanding</b>	<b>Satisfactory</b>

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

### Content of Standardized Tables

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

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		



2021 Albany Schoharie AA	69	16,976,073	46.0	3,609	0.0	0.0	0.0	20.0	29.0	14.0	51.0	62.3	52.5	29.0	8.7	33.4	0.0	0.0	0.0
2021 Greene Non MSA AA	81	14,758,462	54.0	2,066	0.0	0.0	0.0	6.8	4.9	6.5	61.9	60.5	65.7	31.3	34.6	27.8	0.0	0.0	0.0
<b>Total</b>	<b>150</b>	<b>31,734,534</b>	<b>100.0</b>	<b>5,675</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>15.7</b>	<b>16.0</b>	<b>11.3</b>	<b>54.5</b>	<b>61.3</b>	<b>57.3</b>	<b>29.7</b>	<b>22.7</b>	<b>31.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data  
 Due to rounding, totals may not equal 100.0%  
 National Bank of Coxsackie (10000001398) excluded from Aggregate

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
22-23 Albany Schoharie AA	185	43,056,836	61.3	8,718	3.1	14.6	4.7	21.0	35.1	20.3	37.4	35.1	37.0	38.2	14.6	37.3	0.2	0.5	0.7
22-23 Greene Non MSA AA	117	26,146,991	38.7	1,578	3.5	2.6	3.8	4.7	3.4	3.4	66.8	69.2	69.6	25.1	24.8	23.1	0.0	0.0	0.0
<b>Total</b>	<b>302</b>	<b>69,203,827</b>	<b>100.0</b>	<b>10,296</b>	<b>3.1</b>	<b>9.9</b>	<b>4.5</b>	<b>18.7</b>	<b>22.8</b>	<b>17.7</b>	<b>41.6</b>	<b>48.3</b>	<b>42.0</b>	<b>36.3</b>	<b>18.5</b>	<b>35.2</b>	<b>0.2</b>	<b>0.3</b>	<b>0.6</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data  
 Due to rounding, totals may not equal 100.0%  
 National Bank of Coxsackie (10000001398) excluded from Aggregate

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate

2021 Albany Schoharie AA	69	16,976,073	46.0	3,609	16.8	4.3	7.5	18.2	24.6	21.4	22.4	24.6	23.7	42.6	36.2	38.2	0.0	10.1	9.2
2021 Greene Non MSA AA	81	14,758,462	54.0	2,066	19.2	3.7	1.9	16.0	13.6	11.3	20.6	24.7	18.8	44.2	46.9	57.1	0.0	11.1	11.0
<b>Total</b>	<b>150</b>	<b>31,734,534</b>	<b>100.0</b>	<b>5,675</b>	<b>17.6</b>	<b>4.0</b>	<b>5.4</b>	<b>17.5</b>	<b>18.7</b>	<b>17.7</b>	<b>21.8</b>	<b>24.7</b>	<b>21.9</b>	<b>43.1</b>	<b>42.0</b>	<b>45.1</b>	<b>0.0</b>	<b>10.7</b>	<b>9.9</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data  
 Due to rounding, totals may not equal 100.0%  
 National Bank of Coxsackie (10000001398) excluded from Aggregate

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
22-23 Albany Schoharie AA	185	43,056,836	61.3	8,718	23.2	10.3	11.2	17.5	14.6	24.5	20.8	14.6	25.1	38.5	22.7	29.4	0.0	37.8	9.8
22-23 Greene Non MSA AA	117	26,146,991	38.7	1,578	21.2	1.7	3.4	13.4	11.1	10.4	20.0	24.8	21.5	45.4	51.3	55.8	0.0	11.1	8.9
<b>Total</b>	<b>302</b>	<b>69,203,827</b>	<b>100.0</b>	<b>10,296</b>	<b>23.0</b>	<b>7.0</b>	<b>10.0</b>	<b>17.0</b>	<b>13.2</b>	<b>22.3</b>	<b>20.7</b>	<b>18.5</b>	<b>24.5</b>	<b>39.3</b>	<b>33.8</b>	<b>33.5</b>	<b>0.0</b>	<b>27.5</b>	<b>9.7</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data  
 Due to rounding, totals may not equal 100.0%  
 National Bank of Coxsackie (10000001398) excluded from Aggregate