Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

May 4, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Carthage Savings and Loan, National Association
Charter Number 25272

313 State Street
Carthage, NY 13619

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.

Contents

Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on Carthage Savings and Loan, National Association's (CS&L or bank) performance in their assessment areas (AAs) in the state of New York. CS&L's performance demonstrated a reasonable distribution of loans to borrowers of different income levels and a poor distribution of loans to geographies of different income levels.

- CS&L's average loan-to-deposit (LTD) ratio was reasonable based on the bank's size, financial condition, and credit needs of the AAs.

- A substantial majority of home mortgage loans originated and purchased during the evaluation period were inside the bank's AAs.

- CS&L did not receive any Community Reinvestment Act (CRA) related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was reasonable. CS&L's average LTD ratio for the 12-quarter period following the date of the prior evaluation period, December 31, 2021, through the end of the current evaluation period, December 31, 2024, was 84.4 percent. In comparison, the quarterly average LTD ratio of seven similarly situated banks was 83.2 percent, ranging from a low of 64 percent to a high of 121.4 percent.

Lending in Assessment Area

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

The bank originated and purchased 91.7 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										**2022 - 2024**
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000s)**				**Total $(000s)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$**	**%**	**$**	**%**	
Home Mortgage	472	91.7	43	8.4	515	74,368	90.3	8,005	9.7	82,374
Total	**472**	**91.7**	**43**	**8.4**	**515**	**74,368**	**90.3**	**8,005**	**9.7**	**82,374**

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

Description of Institution

CS&L is an intrastate community bank headquartered in Carthage, New York. As of December 31, 2024, CS&L had $299 million in total assets. The bank is a wholly owned subsidiary of Riverbank Financial Corporation, a Maryland chartered mid-tier bank holding company. Riverbank Financial Corporation is wholly owned by Riverbank Financial Corporation, MHC, a Delaware chartered bank holding company. CS&L converted from a federal savings association to a national bank effective June 17, 2022. The bank has one operating subsidiary, Public Square, Inc., which holds assets acquired through foreclosure. This performance evaluation did not include or consider any activities performed or conducted by bank affiliates.

CS&L operates three full-service branches located in two designated AAs, the Watertown-Fort Drum NY metropolitan statistical area (MSA) AA and the NY Non MSA AA. The bank offers traditional and non-complex lending and deposit products and services to customers in its AAs through its branch network. All branches are equipped with automated teller machines (ATMs). The bank also operates a loan production office in Clayton, NY. The bank's business strategy during the evaluation period focused on organic loan and deposit growth throughout the AAs.

As of December 31, 2024, CS&L had $248 million in deposits and 36 million in tier 1 capital. Gross loans totaled $225 million, representing 73 percent of average assets. The bank's primary lending focus continues to be centered in one-to-four family residential real estate products, representing $213 million or 95 percent of total loans. The bank engages in a small amount of consumer and commercial real estate lending, each representing three percent of total loans.

CS&L had no legal, financial, or other impediments hindering its ability to help meet the credit needs in its AAs. The prior CRA Performance Evaluation dated April 10, 2023, resulted in a "Satisfactory" rating based on a "Satisfactory" Lending Test.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated CS&L's performance using small bank examination procedures, which included the Lending Test. The Lending Test evaluated the bank's record of meeting the credit needs of its AAs through its primary lending product, home mortgage loans. During the evaluation period, home mortgage lending represented 67 percent of the total number of loans originated and 92 percent of loans originated by dollar. The evaluation period covered January 1, 2022, through December 31, 2024. The OCC assessed 2022, 2023, and 2024 lending activity against the 2020 U.S. Census data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on its performance in the state of New York. The state rating is based on the full-scope review of the bank's Watertown-Fort Drum NY MSA AA and the NY Non MSA AA. The Watertown-Fort Drum NY MSA AA received the most weight in the evaluation as it represented 74 percent of the bank's total home mortgage originations during the evaluation period.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of New York

CRA rating for the State of New York[1]: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans to individuals of different income levels is reasonable.
- The distribution of loans across geographies of different income levels is poor.
- The bank did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in New York

CS&L's primary lending focus in the state of New York is one-to-four family residential real estate. The bank offers traditional and non-complex residential real estate products including home mortgages, home equity lines of credit, and home equity loans. The bank also offers non-conventional mortgages though the United States Department of Agriculture (USDA), Veterans Affairs (VA), and Federal Housing Administration (FHA) to assist applicants who might not otherwise qualify for a conventional mortgage.

CS&L has two designated AAs in the state of New York, the Watertown-Fort Drum NY MSA AA and the NY Non MSA AA. The Watertown-Fort Drum NY MSA AA includes the entire Watertown-Fort Drum NY MSA, which includes the entire political subdivision of Jefferson County. The NY Non MSA AA includes the entire political subdivision of Lewis County. The AAs met the requirements of the CRA and did not arbitrarily exclude any low-or moderate-income areas.

Watertown-Fort Drum NY MSA AA

Assessment Area(s) - Watertown-Fort Drum NY MSA 2024						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	36	0.00	16.67	55.56	22.22	5.56
Population by Geography	116,721	0.00	22.81	56.02	21.00	0.17
Housing Units by Geography	60,119	0.00	19.58	55.72	24.71	0.00
Owner-Occupied Housing by Geography	23,980	0.00	12.16	58.73	29.11	0.00
Occupied Rental Units by Geography	19,066	0.00	37.29	47.72	14.99	0.00
Vacant Units by Geography	17,073	0.00	10.22	60.41	29.37	0.00
Businesses by Geography	3,022	0.00	24.45	48.97	25.98	0.60
Farms by Geography	191	0.00	7.85	66.49	25.65	0.00

[1] This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Assessment Area(s) - Watertown-Fort Drum NY MSA 2024						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	28,391	20.38	18.48	21.27	39.87	0.00
Household Distribution by Income Level	43,046	22.29	17.16	18.38	42.17	0.00
Unemployment rate (%)	4.71	0.00	5.03	5.17	3.16	0.00
Households Below Poverty Level (%)	13.45	0.00	21.76	10.79	11.24	0.00
Median Family Income (48060 - Watertown-Fort Drum, NY MSA)		$66,711			Median Housing Value	$150,000
Median Family Income (48060 - Watertown-Fort Drum, NY MSA) for 2024		$73,100			Median Gross Rent	$856
					Families Below Poverty Level	9.40

FFIEC File - 2020 Census
FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

The AA consisted of the 36 contiguous census tracts included in Jefferson County, which is the entirety of the Watertown-Fort Drum NY MSA. The AA included six moderate-income census tracts, 20 middle income census tracts, eight upper income census tracts, and two census tracts without an income classification. There were no low-income census tracts in the AA. According to the Federal Financial Institutions Examination Council's (FFIEC) list of distressed and underserved tracts, there were no middle-income census tracts designated as distressed or underserved in the AA.

Bank competition within the AA is low. According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Market Share Report, the AA had nine financial institutions representing 32 office locations and $2 billion in deposits. CS&L ranked third amongst competitors in the AA with a deposit market share of 11.6 percent.

Home mortgage competition in the AA is moderate. According to Home Mortgage Disclosure Act (HMDA) market share data for 2024, CS&L ranked 6th out of 109 lending institutions across the AA for the number of home mortgage applications received. In 2024, CS&L received 99 home mortgage applications in the AA, representing a market share of 4.8 percent. The top five competitors in the AA accounted for 48 percent of home mortgage applications and included Northern Credit Union, Movement Mortgage, Community Bank, Americu Credit Union, and Watertown Savings Bank.

Economic conditions in the AA remain stable. The OCC considered the poverty level, local industry, and unemployment rate across the AA in the evaluation of lending performance. Households and families living below the poverty level in the AA represented 13.5 percent and 9.4 percent, respectively. Per U.S. Census data, 28.8 percent of workers in the AA are local, state, or federal government workers. Among civilian employed workers, educational services, health care and social assistance, and retail trade are the most prominent industries in Jefferson County. The unemployment rate within the AA was 4.7 percent.

The OCC utilized information from two community contacts within the AA to determine local economic conditions and community needs. One of the contacts is a neighborhood preservation corporation that looks for grants and opportunities to bring housing programs to the community, serving primarily low- and moderate-income individuals. The other is an organization that provides essential services such as food, recovery assistance, and support to those facing poverty, food and housing insecurity, and mental health challenges. The contacts reported the need for financial literacy education and lending opportunities related to affordable housing initiatives, assisting first time and low-income homebuyers, and spreading awareness about affordable housing opportunities to borrowers and customers.

NY Non MSA AA

Assessment Area(s) - NY Non MSA 2024						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	9	0.00	11.11	88.89	0.00	0.00
Population by Geography	26,582	0.00	18.63	81.37	0.00	0.00
Housing Units by Geography	15,766	0.00	20.34	79.66	0.00	0.00
Owner-Occupied Housing by Geography	8,407	0.00	20.05	79.95	0.00	0.00
Occupied Rental Units by Geography	1,991	0.00	15.87	84.13	0.00	0.00
Vacant Units by Geography	5,368	0.00	22.45	77.55	0.00	0.00
Businesses by Geography	685	0.00	16.20	83.80	0.00	0.00
Farms by Geography	121	0.00	19.83	80.17	0.00	0.00
Family Distribution by Income Level	7,111	20.49	20.84	21.18	37.49	0.00
Household Distribution by Income Level	10,398	21.03	17.22	19.39	42.35	0.00
Unemployment rate (%)	4.85	0.00	7.98	4.06	0.00	0.00
Households Below Poverty Level (%)	11.55	0.00	9.94	11.93	0.00	0.00
Median Family Income (Non-MSAs - NY)		$68,606			**Median Housing Value**	$123,600
Median Family Income (Non-MSAs - NY) for 2024		$83,800			**Median Gross Rent**	$727
					Families Below Poverty Level	9.58

FFIEC File - 2020 Census
FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

The AA consisted of the 9 contiguous census tracts included in Lewis County. The AA included one moderate-income census tract and eight middle income census tracts. There were no low-income census tracts in the AA. According to the FFIEC's list of distressed and underserved tracts, there were no middle-income census tracts designated as distressed or underserved in the AA.

Bank competition within the AA is low. According to the June 30, 2024, FDIC Market Share Report, the AA had three financial institutions representing six office locations and $356 million in deposits. CS&L ranked third amongst competitors in the AA with a deposit market share of 4.3 percent.

Home mortgage competition in the AA is moderate. According to HMDA market share data for 2024, CS&L ranked 4th out of 60 lending institutions across the AA for the number of home mortgage applications received. In 2024, CS&L received 41 home mortgage applications in the AA, representing a market share of 8.2 percent. The top three competitors in the AA accounted for 48 percent of home mortgage applications and included Northern Credit Union, Community Bank, and Americu Credit Union.

Economic conditions in the AA remain stable. The OCC considered the poverty level, local industry, and unemployment rate across the AA in the evaluation of lending performance. Households and families living below the poverty level in the AA represented 11.6 percent and 9.6 percent, respectively. Per U.S. Census data, 25.6 percent of workers in the AA are local, state, or federal government workers. Among civilian employed workers, educational services, health care and social assistance, and manufacturing are the most prominent industries in Lewis County. The unemployment rate within the AA represented 4.9 percent.

The OCC utilized information from one community contact within the AA to determine local economic conditions and community needs. The contact is a public-benefit corporation created to promote economic growth, infrastructure development, and regional cooperation across Jefferson, Lewis, and St. Lawrence counties. The contact reported the need for affordable mortgage products for low- and moderate-income individuals, home rehabilitation financing, small business and microloans, and more development of affordable housing. The contact specifically noted CS&L as one of the local financial institutions that support the needs of the community.

Scope of Evaluation in New York

The OCC conducted full-scope reviews of the bank's Watertown-Fort Drum NY MSA AA and the NY Non MSA AA. The Watertown-Fort Drum NY MSA AA received the most weight in the state assessment as it represented 74 percent of total home mortgage originations and purchases during the evaluation period. The distribution of loans by income level of the borrower received more weight under the Lending Test given the lack of low-income census tracts and limited number of moderate-income census tracts in the bank's AAs.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Watertown-Fort Drum NY MSA AA

The geographic distribution of home mortgage loans was poor. The geographic distribution of home mortgage loans in moderate-income census tracts was significantly below the percentage of owner-occupied housing and aggregate lending in the AA. The AA did not include any low-income census tracts.

The assessment of performance considered the visibility of the Watertown branch. The bank's Watertown branch is located at the end of a retail plaza off a one-way road in Watertown NY. The branch has limited visibility from nearby main roads due to the location. The bank is in the process of moving the Watertown branch to a location that will have higher visibility because it will be in a stand-alone building on a two-way road with more traffic. The new branch is anticipated to open at the end of 2026.

NY Non MSA AA

The geographic distribution of home mortgage loans was poor. The geographic distribution of home mortgage loans in moderate-income census tracts was well below the percentage of owner-occupied housing and aggregate lending in the AA. The AA did not include any low-income census tracts.

The assessment of performance considered the limited number of moderate-income census tracts in the AA and the distance between the bank's one branch in the AA and the one moderate-income census tract in the AA. The bank's only branch in the AA is located in Croghan, New York, approximately 20 miles from the only moderate-income census tract in the AA.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels given the product lines offered by the bank.

Home Mortgage Loans

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

Watertown-Fort Drum NY MSA AA

The distribution of home mortgage loans to borrowers of different income levels was reasonable. The bank's lending to low-income borrowers was significantly below the number of low-income families in the AA but was close to the percentage of aggregate lending to low-income borrowers in the AA. The bank's lending to moderate-income borrowers was close to the percentage of moderate-income families in the AA and slightly exceeded aggregate lending to moderate-income borrowers in the AA.

The assessment of performance considered housing affordability for low-income borrowers during the evaluation period given the median listing price and median family income. Based on information in the above table, the Median Family Income for the AA was $73,100. The median housing value in the AA was $160,000 and $249,900 in 2022 and 2024, respectively, reflecting a change of 56.2 percent from 2022 to 2024 according to Realtor.com data. Low-income families within the AA earned less than $36,550 and moderate-income families earned at least $36,551 and less than $58,480. One method used to determine housing affordability assumed 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 $914 for low-income borrowers and $1,462 for moderate-income borrowers. Assuming a

30-year mortgage with a six percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be $1,342. Low-income families would be challenged to afford a mortgage loan in this AA.

NY Non MSA AA

The distribution of home mortgage loans to borrowers of different income levels was excellent. The bank's lending to low-income borrowers was significantly below the number of low-income families in the AA but was close to the percentage of aggregate lending to low-income borrowers in the AA. The bank's lending to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate lending to moderate-income borrowers in the AA.

The assessment of performance considered housing affordability for low-income borrowers during the evaluation period given the median listing price and median family income. Based on information in the above table, the median family income for the AA was $83,800. The median housing value in the AA was $170,450 and $201,800 in 2022 and 2024, respectively, reflecting a change of 18.4 percent from 2022 to 2024 according to Realtor.com data. Low-income families within the AA earned less than $41,900 and moderate-income families earned at least $41,901 and less than $67,040. One method used to determine housing affordability assumed 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 $1,048 for low-income borrowers and $1,676 for moderate-income borrowers. Assuming a 30-year mortgage with a six percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be $1,083. Low-income families would be challenged to afford a mortgage loan in this AA.

Responses to Complaints

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
New York		
Watertown-Fort Drum NY MSA AA	Full-scope	Jefferson County
NY Non MSA AA	Full-scope	Lewis County

Appendix B: Summary of State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
Carthage Savings and Loan, National Association	Satisfactory
State:	
New York	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

Table 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
NY Non MSA AA	123	16,610	26.06	1,596	--	--	--	20.05	6.50	20.36	79.95	93.50	79.64	--	--	--	--	--	--
Watertown-Fort Drum NY MSA	349	57,758	73.94	7,062	--	--	--	12.16	5.16	13.93	58.73	64.76	59.40	29.11	30.09	26.56	--	--	0.06
Total	**472**	**74,368**	**100.00**	**8,658**	**--**	**--**	**--**	**14.21**	**5.51**	**15.12**	**64.24**	**72.25**	**63.13**	**21.55**	**22.25**	**21.67**	**--**	**--**	**0.05**

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
NY Non MSA	123	16,610	26.06	1,596	20.49	8.13	8.65	20.84	25.20	23.31	21.18	24.39	26.13	37.49	42.28	33.33	--	--	8.58
Watertown-Fort Drum NY MSA	349	57,758	73.94	7,062	20.38	3.72	4.39	18.48	17.77	17.62	21.27	22.06	24.51	39.87	55.59	38.71	--	0.86	14.77
Total	**472**	**74,368**	**100.00**	**8,658**	**20.40**	**4.87**	**5.17**	**18.95**	**19.70**	**18.66**	**21.25**	**22.67**	**24.81**	**39.39**	**52.12**	**37.72**	**--**	**0.64**	**13.63**

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%