



PUBLIC DISCLOSURE

April 1, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Long Island
Charter Number: 13126

275 Broad Hollow Road
Suite 200
Melville, NY 11747

Office of the Comptroller of the Currency
Times Square Tower, 10th Floor
New York, New York 10036

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

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Overall CRA Rating

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

The following table indicates the performance level of The First National Bank of Long Island (FNBLI or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	The First National Bank of Long Island - Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory			
Low Satisfactory	X		
Needs to Improve			X
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on a Low Satisfactory rating in the state of New York.
- The Investment Test rating is based on an Outstanding rating in the state of New York.
- The Service Test rating is based on a Needs to Improve rating in the state of New York.

Lending in Assessment Area

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

The bank originated and purchased 90.3 percent of its total loans by number inside the bank's AA during the evaluation period.¹ 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	552	74.5	189	25.5	741	637,177,348	70.5	266,857,754	29.5	905,035,102
Small Business	1,521	97.9	33	2.1	1,554	251,340,000	97.3	6,998,000	2.7	258,338,000
Total	2,073	90.3	222	9.7	2,295	888,517,348	76.4	273,855,754	23.6	1,162,373,102

¹ The evaluation period covered January 1, 2020, through December 31, 2022 (evaluation period).

Description of Institution

FNBLI is an independent, full-service intrastate bank headquartered in Melville, NY in Nassau County on Long Island. The bank is the sole subsidiary of The First of Long Island Corporation, a publicly traded company on NASDAQ under the symbol "FLIC." During the evaluation period, FNBLI provided a wide range of financial products and services to individuals, professional, corporate, institutional and government customers primarily in Manhattan, Brooklyn, Queens, and Long Island. Financial products and services provided by FNBLI included personal and commercial/business loan and deposit products, mobile and online banking, investment management and trust services, drive-up facilities, deposit taking automated teller machines (ATM), and remote deposit capture.

As of December 31, 2022, FNBLI reported total assets of \$4.3 billion comprised of \$3.3 billion in loans and leases and \$730 million in investments, representing 76.7 percent and 17.1 percent of total assets, respectively. As a percentage of total loans, FNBLI's loan portfolio was composed of home mortgage loans including multifamily and home equity loans (66.9 percent), commercial real estate loans (29.3 percent), commercial and industrial loans (3.5 percent), and consumer loans (0.03 percent). Deposits totaled \$3.5 billion and tier 1 capital totaled \$429.4 million. FNBLI operated a small trust operation with \$19.6 million in fiduciary assets and \$4 thousand in custody and safekeeping. During the evaluation period, FNBLI experienced modest growth as total assets and total deposits increased 4.5 percent and 10.2 percent respectively.

Within its AA, FNBLI operated its main office, branches, and deposit-taking ATMs. Specifically, as of December 31, 2022, FNBLI operated 41 branch offices and 37 deposit taking ATMs. Of the 41 branches, 17 were located within Nassau County, 16 were located within Suffolk County, five were located within Queens County, two were located within Kings County, and one was located within New York County. FNBLI's ATMs were primarily operated in conjunction with branch locations, although FNBLI also operated one standalone ATM in Nassau County. In 2022, to support strategic growth and expansion, FNBLI consolidated operations into a single headquarters in Melville, NY which also resulted in one branch relocation.

There were no legal or financial factors that impacted FNBLI's ability to help meet the credit needs of its community.

FNBLI's prior CRA performance evaluation, dated September 21, 2020, resulted in a Satisfactory rating with a High Satisfactory Lending Test rating, High Satisfactory Investment Test rating, and Low Satisfactory Service Test rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNBLI's CRA performance was evaluated using the Large Bank Examination Procedures. The Large Bank procedures include a Lending Test, an Investment Test, and a Service Test over the evaluation period of January 1, 2020, through December 31, 2022. Specifically, performance was assessed using the primary loan products FNBLI originated and purchased as well as community development (CD) activities that FNBLI provided over the period. CD activities included qualified CD loans, CD investments, grants, and donations, as well as CD services. In conjunction with this CRA evaluation,

consideration was afforded to qualifying activities that responded to the COVID-19 pandemic and its significant impact across the U.S.

FNBLI's lending performance was assessed based on the bank's primary loan products. For purposes of this evaluation, primary loan products were products for which FNBLI originated at least 20 loans within the AA over the evaluation period. FNBLI originated a sufficient number of AA home mortgage loans and small businesses loans over the period to conduct a meaningful analysis. FNBLI did not originate or purchase any AA small farm loans over the period. Therefore, an analysis of small farm lending was not performed.

Primary loan products consisted of home mortgage loans reported in accordance with the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported in accordance with the CRA. FNBLI reported home mortgage data and small business data for 2020, 2021, and 2022 as required by the HMDA and the CRA, respectively. Home mortgage and small business loan aggregate lending and market share percentages considered only lenders that submitted HMDA and small business data. Lenders that collected, but did not submit data, were not considered in the aggregate lending and market share percentages. FNBLI did not collect or submit consumer loan data for consideration, as it was not a significant focus of its portfolio. It was determined the data submitted as required by the HMDA and the CRA was accurate for purposes of this evaluation. It was also verified that CD activities submitted by FNBLI met the CD regulatory definition.

The CRA analysis measured FNBLI's performance over the evaluation period, in a single delineated AA. In order to provide more current and accurate demographic data, the federal banking agencies currently update U.S. census data every five years rather than even 10 years. This practice began with the Census Bureau's 2015 American Community Survey (ACS). The most recent update was conducted in 2020. As a result of the 2020 update, the number of the bank's AA census tracts (CT) increased by 210 from 2,126 to 2,336. Specifically, the number of AA CTs classified as low-income increased from 136 to 142; AA CTs classified as moderate-income increased from 510 to 521; AA CTs classified as middle-income increased from 891 to 962; and CTs classified as upper-income increased from 566 to 582. Additionally, the number of AA CTs for which the income classification is unknown increased from 59 to 129. The AA CT increases are reflected in 2022 data.

Selection of Areas for Full-Scope Review

For purposes of this evaluation, the 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. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected.

Ratings

The bank's overall rating is based on the bank's rating for the state of New York. FNBLI's AA consisted of a portion of the NY MMSA and located entirely within New York State. Therefore, performance was assessed at the state level, not at the MMSA level.

The Lending Test weighted FNBLI's 2020-2021 lending record more heavily than its 2022 lending record because the bank originated more loans during 2020-2021 than during 2022. The Lending Test also weighted FNBLI's small business lending record more heavily than its home mortgage lending

record because FNBLI originated a greater number of small business loans than home mortgage loans over the evaluation period.

Refer to the “Scope” section under the 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 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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

New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The geographic distribution of AA loans is adequate.
- The overall distribution of loans to individuals of different incomes and small loans businesses of different sizes is adequate.
- The level of CD loans is relatively high.
- The level of qualified investments, donations, and grants is excellent; however, the institution is rarely in a leadership position and rarely uses innovative and/or complex investments to support CD initiatives.
- Retail delivery systems are unreasonably inaccessible to all portions of the AA.
- The level of CD services is adequate.

Description of Institution's Operations in New York

During the evaluation period, FNBLI's performance was measured within a single AA within the state of New York, the NY MMSA AA. The NY MMSA AA consisted of the Nassau-Suffolk Metropolitan Division (MD) (MD #35004) and a portion of the New York-Jersey City-White Plains NY-NJ MD (MD #35154). This included Nassau and Suffolk Counties in their entirety which comprised all of the Nassau-Suffolk MD; Kings and Queens Counties in their entirety within the New York-New Jersey-White Plains NY-NJ MD; and a portion of New York County. As previously noted, as of December 31, 2022, FNBLI operated 41 branches and 37 deposit taking ATMs throughout the counties of Suffolk and Nassau and the boroughs of Queens, Brooklyn, and Manhattan.

FNBLI's strategy encompassed consolidating branches as part of a branch optimization strategy and launching a full-scale rebranding project that included upgrades to the bank's electronic and digital banking platforms. FNBLI's strategy also focused on pursuing organic growth through de novo branch expansion and business development opportunities. Expansion initially focused on market development

on the east end of Long Island and into the boroughs of Queens and Brooklyn. The bank's lending strategy focused on diversifying the loan portfolio with a mix of residential and commercial lending. According to Federal Deposit Insurance Corporation (FDIC) information as of June 20, 2021, FNBLI reported deposits of \$3.4 billion. One hundred percent of deposits were within the bank's AA. Of 113 depository institutions taking deposits from within the AA, FNBLI ranked 36th with 0.17 percent deposit market share. Depository institutions with the greatest level of AA deposit market share included JP Morgan Chase Bank (JP Morgan) with 39.9 percent, Goldman Sachs Bank USA with 10.4 percent, The Bank of New York Mellon with 8.9 percent, Citibank, N.A. (Citibank) with 5.9 percent, and HSBC Bank USA with 5.8 percent.

According to FDIC deposit information as of June 30, 2022, FNBLI reported deposits of \$3.6 billion. One hundred percent of deposits were within the bank's AA. Of 109 depository institutions taking deposits from within the AA, FNBLI ranked 35th with 0.17 percent deposit market share. Depository institutions with the greatest level of AA deposit market share included JP Morgan Chase with 37.8 percent, Goldman Sachs Bank USA with 12.3 percent, The Bank of New York Mellon with 8.6 percent, Citibank with 5.8 percent, and Bank of America, N.A. (Bank of America) with 5.7 percent.

Economic Data

As of 2022, Moody's Analytics reports that the Nassau-Suffolk MD economy encountered elevated recession risk while the New York-Jersey City-White Plains MD economy was experiencing recovery. Strengths of the Nassau-Suffolk County MD include a robust healthcare sector benefitting the older and wealthy area population, a highly skilled workforce, and connection to New York City contributing to higher per capita income. Weaknesses of the MD include an aging population, a lack of developable real estate, and elevated housing prices resulting in out migration and continual loss of residents to more affordable areas. Strengths of the New York-Jersey City-White Plains NY-NJ MD include high per capita income, robust international immigration, limited manufacturing exposure, and a reputation as the world financial capital. Although the MD is considered a tourist destination, tourism continued to lag pre-pandemic levels in 2022. Significant technology and finance sector layoffs, as well as hybrid or remote work arrangements, resulted in the divestiture of commercial real estate. Weaknesses of the MD further include a high cost of living, high office rents, aging infrastructure, population loss resulting in worsening fiscal health, and challenges filling low-wage positions.

As reported by the U.S. Bureau of Labor Statistics (BLS), the Nassau-Suffolk County MD unemployment rate (not seasonally adjusted) was 2.6 percent as of December 2022, compared to 2.7 percent in 2021, and 5.3 percent in 2020. The COVID-19 pandemic and the resulting economic impacts drove the high 2020 unemployment rate. The Nassau-Suffolk County MD unemployment rate of 2.6 percent compared favorably to the New York state unemployment rate of 4.2 percent. Nassau-Suffolk County MD employment sectors consisted of education and health services (21.0 percent) government (15.1 percent), professional and business services (13.1 percent), transportation and utilities (3.3 percent), and information (1.1 percent). Major Nassau-Suffolk County MD employers included Northwell Health, Henry Schein Inc., Volt Information Sciences, JetBlue Airways, and Altice USA.

As reported by the BLS, the New York-Jersey City-White Plains NY-NJ MD unemployment rate (not seasonally adjusted) was 4.1 percent as of December 2022, compared to 5.4 percent in 2021, and 8.5 percent in 2020. The COVID-19 pandemic and the resulting economic impacts drove the high 2020 unemployment rate. The New York-Jersey City-White Plains NY-NJ MD unemployment rate of 4.1 percent compared similarly to the New York state unemployment rate of 4.2 percent. New York-Jersey City-White Plains NY-NJ MD employment sectors consisted of government (22.5 percent), education

and health services (21.0 percent), professional and business services (16.6 percent), construction (3.7 percent), and manufacturing (2.7 percent). Major New York-Jersey City-White Plains NY-NJ MD employers included Montefiore Health System, Mount Sinai Health System, JP Morgan Chase, Bank of America, and New York Presbyterian Healthcare System.

Community Contacts

The OCC relied on information provided by five community contacts to understand area needs and opportunities. The contacts represented organizations focused on economic development, affordable housing, and community services targeting low- and moderate-income individuals. Community contacts indicated a need for affordable housing. Affordable housing needs included affordable housing development for homeowners and renters. Community contacts cited high housing costs and mortgage interest rates and indicated there is also a need for micro-loans, access to credit, technical support, and space for starting or expanding small businesses. One community contact advised many start-ups have the potential to succeed but lack the documentation, business plans, and technical expertise to qualify for bank loans. Another community contact mentioned a need for financial literacy targeting area adults under 30 years of age.

NY MMSA 2020-2021

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 NY MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,162	6.3	23.6	41.2	26.2	2.7
Population by Geography	8,365,492	7.8	26.2	41.1	24.6	0.3
Housing Units by Geography	3,267,786	7.2	24.5	39.6	28.4	0.3
Owner-Occupied Units by Geography	1,435,919	2.0	16.0	49.9	32.0	0.2
Occupied Rental Units by Geography	1,525,867	12.5	32.5	30.5	24.2	0.4
Vacant Units by Geography	306,000	5.3	25.1	36.9	32.3	0.4
Businesses by Geography	1,243,006	5.2	19.2	34.9	38.7	2.1
Farms by Geography	10,893	3.2	21.3	47.0	27.7	0.8
Family Distribution by Income Level	1,923,130	26.9	17.0	18.7	37.4	0.0
Household Distribution by Income Level	2,961,786	28.2	15.1	16.8	39.9	0.0
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY- NJ		\$67,560	Median Housing Value			\$529,669
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$108,193	Median Gross Rent			\$1,428
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2021 D&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>						

NY MMSA 2022

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022 NY MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,336	6.1	22.3	41.2	24.9	5.5
Population by Geography	8,745,682	7.4	24.2	42.5	24.6	1.3
Housing Units by Geography	3,349,855	7.1	22.2	40.9	28.5	1.3
Owner-Occupied Units by Geography	1,497,611	2.0	16.7	50.2	30.4	0.6
Occupied Rental Units by Geography	1,524,820	12.5	27.7	32.6	25.2	1.9
Vacant Units by Geography	327,424	5.0	22.0	36.6	34.7	1.7
Businesses by Geography	1,305,039	5.5	17.9	35.6	36.8	4.1
Farms by Geography	11,221	3.3	19.5	47.7	27.5	2.0
Family Distribution by Income Level	1,946,104	25.1	16.5	18.8	39.7	0.0
Household Distribution by Income Level	3,022,431	27.3	14.5	16.2	42.0	0.0
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY- NJ		\$85,483	Median Housing Value			\$664,137
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$130,301	Median Gross Rent			\$1,697
			Families Below Poverty Level			9.2%
<i>Source: 2020 U.S. Census and 2022 D&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>						

Scope of Evaluation in New York

The OCC conducted a full-scope review of the NY MMSA which consisted of the Nassau County-Suffolk County, NY MD and portions of the New York-Jersey City-White Plains, NY-NJ MD. The AA represented 100.0 percent of FNBLI's branches and deposits. As noted previously, the Lending Test weighted 2020-2021 lending performance more heavily than 2022 lending performance and small business lending more heavily than home mortgage 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 Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NY MMSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
NY MMSA	552	1,521	0	39	2,112	100.0%	100.0%

Dollar Volume of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
NY MMSA	\$637,177,348	\$251,340,000	\$0	\$85,505,940	\$974,023,288	\$100.00	100.00%

According to 2021 HMDA peer mortgage data, 460 lenders originated home mortgage loans in the AA. Of the 460 lenders, FNBLI ranked 112th representing an AA home mortgage loan market share of 0.10 percent. FNBLI's 0.10 percent home mortgage loan market share compared similarly to FNBLI's 0.17 percent AA deposit market share. While FNBLI's home mortgage loan market share was significantly lower than its deposit AA ranking, there were significantly more AA home mortgage lenders than AA deposit taking institutions. The top five AA home mortgage loan originators/purchasers were JP Morgan Chase, Wells Fargo Bank N.A. (Wells Fargo), Rocket Mortgage, Citibank, and Bethpage Federal Credit Union. These top five lenders garnered a combined market share of 28.1 percent. For these top five lenders, AA home mortgage loan market share ranged from 3.8 percent to 9.3 percent.

According to 2022 HMDA peer mortgage data, 470 lenders, originated home mortgage loans in the AA. Of the 470 lenders, FNBLI ranked 75th representing an AA home mortgage loan market share of 0.21 percent. FNBLI's 0.21 percent home mortgage loan market share compared similarly to FNBLI's 0.17 percent AA deposit market share. While FNBLI's home mortgage loan market share was considerably lower than its deposit AA ranking, there were significantly more AA home mortgage lenders than AA deposit taking institutions. The top five AA home mortgage loan originators/purchasers were JP Morgan Chase, Wells Fargo, CBNA, Bethpage Federal Credit Union, and Citibank. These top five lenders garnered a combined market share of 28.1 percent. For these top five lenders, AA home mortgage loan market share ranged from 4.3 percent to 8.2 percent.

According to 2021 CRA peer small business loan data, 387 lenders originated small business loans in the AA. Of the 387 lenders, FNBLI ranked 44th representing an AA small business loan market share of 0.14 percent. FNBLI's 0.14 percent small business loan market share compares similarly to FNBLI's 0.17 percent AA deposit market share. While FNBLI's small business loan market share was less favorable than its deposit AA ranking, there were significantly more AA small business lenders than AA deposit taking institutions. The top five AA small business loan/originators purchasers were American Express National Bank, JP Morgan Chase, Bank of America, Cross River, and Citibank. These top five lenders garnered a combined market share of 66.5 percent. For these top five lenders, small business loan market share ranged from 5.0 percent to 25.9 percent.

According to 2022 CRA peer small business loan data, 293 lenders originated small business loans in the AA. Of the 293 lenders, FNBLI ranked 54th representing an AA small business loan market share of 0.04 percent. FNBLI's 0.04 percent small business loan market share was less than FNBLI's 0.17 percent AA deposit market share. While FNBLI's small business loan ranking was less favorable than its deposit ranking, there were significantly more AA small business lenders than AA deposit taking

institutions. The top five AA small business loan originators/purchasers were American Express National Bank, JP Morgan Chase, Bank of America, Capital One, N.A. (Capital One), and Citibank. These top five lenders garnered a combined market share of 77.4 percent. For these top five lenders, small business loan market share ranged from 4.4 percent to 35.1 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent.

Home Mortgage Loans 2020-2021

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in both low- and moderate-income AA CTs exceeded both the percentage of owner-occupied housing and the aggregate percentage of all reporting home mortgage lenders in those CTs.

Home Mortgage Loans 2022

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in both low- and moderate-income AA CTs exceeded both the percentage of owner-occupied housing and the aggregate percentage of all reporting home mortgage lenders in those CTs.

Small Loans to Businesses

Refer to Table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is poor.

Small Loans to Businesses 2020-2021

The geographic distribution of small loans to businesses is very poor. The geographic distribution of loans to small businesses in both low- and moderate-income AA CTs was significantly below the percentage of businesses in those CTs and significantly below the aggregate percentage of all reporting small businesses lenders.

The assessment of FNBLI's record of originating and purchasing small loans to businesses located in low- and moderate-income AA CTs considered FNBLI's minimal small businesses loan market share and the dominance of AA business lending competition emanating from credit card issuers as well as large and multinational banks. In 2021, the top five AA small business lenders included American Express National Bank, JP Morgan Chase, Bank of America., Cross River, and Citibank. Collectively, these top five small business lenders amassed a combined market share of 66.5 percent. For these top

five lenders, average loan amounts ranged from \$16 thousand to \$36 thousand. In comparison, FNBLI's small businesses loans averaged \$151 thousand.

Small Loans to Businesses 2022

The geographic distribution of small loans to businesses is adequate. The geographic distribution of loans to small businesses in both low- and moderate-income AA CTs was below the percentage of businesses in those CTs and below the aggregate percentage of all reporting small businesses lenders.

The assessment of FNBLI's record of originating and purchasing small loans to businesses located in low- and moderate-income AA CTs considered FNBLI's minimal small businesses loan market share and the dominance of business lending competition emanating from credit card issuers as well as large and multinational banks. In 2022 the top five AA small business lenders included American Express National Bank, JP Morgan Chase, Bank of America, Capital One, and Citibank. Collectively, these top five small business lenders amassed a combined market share of 77.4 percent. For these top five lenders, average loan amounts ranged from \$7 thousand to \$26 thousand. In comparison FNBLI's small business loans averaged \$187 thousand.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels is poor.

Home Mortgage Loans 2020-2021

The borrower distribution of home mortgage loans to individuals of different income levels is poor given performance context. The borrower distribution of home mortgage loans to both low- and moderate-income AA borrowers was significantly below the percentage of low- and moderate-income families and significantly below the aggregate percentage of all reporting home mortgage lenders.

The assessment of FNBLI's distribution of home mortgage loans to AA borrowers of different income levels considered housing affordability. Specifically, area housing costs relative to median family income (MFI) adversely impacted housing affordability for low- and moderate-income AA borrowers. Based on the 2020-2021 Nassau County-Suffolk County MD MFI ranges, low-income families earned less than \$54,097 and moderate-income families earned between \$54,097 and \$86,554. Based on 2020-

2021 New Jersey-Jersey City White Plains, NY-NJ MD MFI ranges, low-income families earned less than \$33,780 and moderate-income families earned between \$33,780 and \$54,048.

One method employed to assess housing affordability assumes a maximum monthly principal and interest payment of no more than 30.0 percent of applicant income. For the Nassau County-Suffolk County MD, this housing affordability assessment method calculates a maximum monthly mortgage payment of \$1,352 for low-income borrowers and \$2,164 for moderate-income borrowers. For the New York-Jersey City-White Plains, NY-NJ MD, this housing affordability assessment method calculates a maximum monthly mortgage payment of \$845 for low-income borrowers and \$1,351 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, absent any downpayment, homeowners' insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home priced at the median housing value of \$529,669 would be \$2,843. A monthly mortgage payment of \$2,843 would prove to be unaffordable or challenging for low- and moderate-income AA borrowers.

Home Mortgage Loans 2022

The borrower distribution of home mortgage loans to individuals of different income levels is poor given performance context. The borrower distribution of home mortgage loans to both low- and moderate-income AA borrowers was significantly below both the percentage of low- and moderate-income families and significantly below the aggregate percentage of all reporting AA home mortgage lenders.

The assessment of FNBLI's distribution of home mortgage loans to AA borrowers of different income levels considered housing affordability. Specifically, area housing costs relative to MFI adversely impacted housing affordability for low- and moderate-income AA borrowers. Based on 2022 Nassau County-Suffolk County MD MFI ranges, low-income families earned less than \$65,151 and moderate-income families earned between \$65,151 and \$104,241. Based on 2022 New Jersey-Jersey City White Plains, NY-NJ MD MFI ranges, low-income families earned less than \$42,742 and moderate-income families earned between \$42,742 and \$68,386.

Under the housing affordability assessment method described above, a maximum monthly mortgage payment of \$1,629 for low-income borrowers and \$2,626 for moderate-income borrowers is calculated for the Nassau County-Suffolk County MD. For the New York-Jersey City-White Plains, NY-NJ MD, this housing affordability assessment method calculates a maximum monthly mortgage payment of \$1,069 for low-income borrowers and \$1,710 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, absent any downpayment, homeowners' insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home priced at the median housing value of \$664,137 would be \$3,565. A monthly mortgage payment of \$3,565 would prove to be unaffordable or challenging for low- and moderate-income AA borrowers.

Small Loans to Businesses

Refer to Table R in the state of New York 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 adequate.

Small Loans to Businesses 2020-2021

The distribution of small loans to businesses of different sizes is adequate. The percentage of loans to small businesses originated or purchased was significantly below the percentage of small businesses and significantly below the aggregate percentage of all reporting small business lenders.

The assessment of FNBLI's small business lending performance considered the impact of loans to businesses with unavailable revenue data. During 2020 and 2021, FNBLI actively participated in the Payment Protection Program (PPP), launched in response to the COVID-19 pandemic. According to FNBLI, as of January 20, 2021, the bank originated 689 PPP loans totaling \$168 million. For PPP loans, banks were not required to collect, consider, or report gross annual reviews for PPP business loan applicants. Consequently, over the 2020-2021 evaluation period, FNBLI reported businesses loan data with unavailable borrower revenue information for over 80.0 percent of its small business loans.

The assessment of FNBLI's small business lending performance considered FNBLI's minimal small businesses loan market share and the dominance of business lending competition emanating from credit card issuers as well as large and multinational banks.

Small Loans to Businesses 2022

The distribution of small loans to businesses of different sizes is adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses and below the aggregate percentage of all reporting small businesses lenders.

The assessment of FNBLI's small business lending performance considered FNBLI's minimal small businesses loan market share and the dominance of business lending competition emanating from credit card issuers as well as large and multinational banks.

Community Development Lending

The institution has made a relatively high level of CD loans.

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

During the evaluation period, FNBLI originated 39 CD loans totaling \$85.5 million within its AA. CD loan purposes were primarily focused on financing small businesses and promoting economic development. The majority of FNBLI's CD qualified loans were PPP loans originated in amounts greater than \$1 million. Many AA businesses were shuttered during the evaluation period as a result of city, state, and other governmental response to the COVID-19 pandemic.

New York Statewide

FNBLI also made two CD loans totaling \$4.3 million outside of its AA in the broader statewide area. These loans were primarily originated for the purpose of affordable housing and assisted in providing 31 affordable housing units in communities outside of FNBLI's AA.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs. The loan products offered by FNBLI are offered bank-wide to all customers.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the institution's performance in the NY MMSA is excellent.

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

The institution exhibits good responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

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)
NY MMSA	4	\$1,109	36	\$29,412	40	100%	\$30,521	100%	0	\$0

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

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

FNBLI's qualified investments including current period investments, donations, and grants, as well as prior period investments totaled \$30.5 million and represented 7.1 percent of FNBLI's tier 1 capital as of December 31, 2022.

During the evaluation period, FNBLI funded 13 qualified CD investments. These qualified CD investments consisted of 13 mortgage-backed securities (MBS) totaling \$29.3 million. These MBS investments were securitized by 219 residential mortgage loans to low-and moderate-income borrowers or geographies in the AA. Home mortgage loans to low- and moderate-income borrowers and in low- and moderate-income geographies were identified as an AA credit need.

During the evaluation period, the bank also funded 23 CD qualified donations and grants totaling \$128,625. These 23 donations and grants provided funding to various community organizations serving the AA. Generally, these organizations offered community services targeted to low- or moderate-income individuals or focused on low-or moderate-income geographies.

Examples of CD donations include:

- A \$50,000 donation to a nonprofit, volunteer-based community organization operating within Nassau County, NY. The non-profit organization provides essential services including food and housing for low- and moderate-income residents.

- A \$2,500 donation to a nongovernmental, nonprofit organization with operations in Suffolk County, NY. The non-profit organization focuses on affordable housing services for low- and moderate-income families.
- A \$2,500 donation to a local, nonprofit community organization that organizes workforce development events including seminars and training for low- and moderate-income residents.

As of December 31, 2022, the balance remaining on FNBLI’s prior period CD investments totaled \$1.1 million. These prior period investments consisted of four MBS that benefitted the bank’s AA.

SERVICE TEST

The bank’s performance under the Service Test in New York is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the NY MMSA is rated Needs to Improve.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals.

Distribution of Branch Delivery System											
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	Low	Mod	Mid	Upp
NY MMSA	100.0	41	100.00	0.0	7.3	56.1	36.6	7.4	24.2	42.5	24.6

At the end of the evaluation period on December 31, 2022, FNBLI operated 41 branch offices in its AA. In 2022, 7.4 percent and 24.2 percent of the AA population resided in low- and moderate-income CTs, respectively. FNBLI did not operate any branches in low-income CTs, significantly below the percentage of AA population residing within those CTs. FNBLI operated just three branches in moderate-income CTs. Consequently, FNBLI’s distribution of branches in moderate-income CTs was well below the percentage of AA population residing within those CTs.

Consideration was given to the impact of a 2022 change in the designated income level of one CT in which FNBLI operated a branch office. Specifically, in response to 2020 U.S. census results, the designated income level of one CT in which FNBLI operates a branch, was updated from moderate-income to middle-income. Prior to the change in the designation of the CT from moderate- to middle-income, FNBLI’s distribution of branches in moderate-income CTs was also well below the percentage of the population residing in those moderate-income CTs.

FNBLI offered alternative delivery systems including 24-hour ATMs, online/digital banking, and mobile banking services. These alternative delivery systems provided additional service delivery availability and access for retail and commercial/business customers. FNBLI operated 37 ATMs within its AA, all of which were deposit-taking. With the exception of one stand-alone ATM, the remaining

ATMs were operated in conjunction with branch office locations. The use of alternative delivery systems by residents of low- and moderate-income AA CTs was not considered in this analysis since FNBLI did not provide data relative to the use of the delivery systems by those CT residents.

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems particularly in low-and moderate-income geographies and/or to low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
NY MMSA	3	14	0	0	-5	-6

During the evaluation period, FNBLI opened three new branch offices in its AA. Of the three branch openings, one branch was opened in a moderate-income CT and two branches were opened in middle-income CTs. Of the fourteen branches closed, one was in a moderate-income CT. FNBLI closed branches in conjunction with its branch optimization strategy.

Services, including where appropriate, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals.

A majority of FNBLI’s branch offices were open from 9:00am until 4:00pm. Most branch offices offered extended hours on Fridays from 9:00am until 7:00pm. A large portion of the branches also offered Saturday hours from 9:00am until 1:00pm. Additionally, most branches offered all bank-wide services and delivery systems. FNBLI also operated one ATM-only location in the AA.

Community Development Services

The institution provides an adequate level of CD services.

During the evaluation period, FNBLI employees spent 1,650 hours providing financial or job-specific expertise and/or technical assistance to 11 community service organizations in the NY MMSA. Of the 1,650 service hours, 1,542 hours were spent providing 17 CD services activities to 10 AA community organizations. Also, of the 1,650 service hours, 108 hours were spent providing services in the broader statewide regional area. Specifically, an FNBLI employee spent 108 hours serving on the board of directors for an economic development organization. In addition to the 108 service hours focused on economic development, 1,462 service hours focuses on services targeting low-and moderate-income residents, and 80 service hours focused on affordable housing.

Examples of CD services include:

- A bank officer provided 540 service hours by serving on the board of directors for an area non-profit organization. The mission of the organization is to provide a variety of essential services, including homeless shelters and soup kitchens, to assist those challenged by hunger, homelessness, and poverty.

- A bank officer provided 80 service hours by serving on the board of directors for an area affordable housing organization. The mission of the organization is to provide temporary and permanent housing and supportive services to those who are homeless, living in poverty, or living with mental illness.
- Several employees provided financial or job-specific expertise and/or technical assistance through teaching financial literacy to low-and-moderate income students at three schools and youth centers.

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:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Home mortgage loans, small business loans CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
NY MMSA	Full-Scope	Kings County, Nassau County, Queens County, Suffolk County, and a portion of New York County

Appendix B: Summary of MMSA and State Ratings

RATINGS The First National Bank of Long Island				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
FNBLI	Low Satisfactory	Outstanding	Needs to Improve	Satisfactory
MMSA or State:				
New York	Low Satisfactory	Outstanding	Needs to Improve	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of

businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
NY MMSA	276	337,594,740	100.0	213,205	2.0	3.6	2.5	16.0	20.3	16.0	49.9	33.0	49.7	32.0	42.8	31.7	0.2	0.4	0.1
Total	276	337,594,740	100.0	213,205	2.0	3.6	2.5	16.0	20.3	16.0	49.9	33.0	49.7	32.0	42.8	31.7	0.2	0.4	0.1

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
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
NY MMSA	276	299,582,608	100.0	128,217	2.0	4.0	2.4	16.7	22.8	17.2	50.2	35.5	48.8	30.4	37.0	30.9	0.6	0.7	0.8
Total	276	299,582,608	100.0	128,217	2.0	4.0	2.4	16.7	22.8	17.2	50.2	35.5	48.8	30.4	37.0	30.9	0.6	0.7	0.8

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
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	
NY MMSA	276	337,594,740	100.0	213,205	26.9	0.0	3.4	17.0	2.5	14.8	18.7	6.5	23.4	37.4	63.8	45.4	0.0	27.2	13.1	
Total	276	337,594,740	100.0	213,205	26.9	0.0	3.4	17.0	2.5	14.8	18.7	6.5	23.4	37.4	63.8	45.4	0.0	27.2	13.1	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022	
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	
NY MMSA	276	299,582,608	100.0	128,217	25.1	0.0	4.9	16.5	2.2	16.5	18.8	10.9	22.3	39.7	58.7	41.6	0.0	28.3	14.7	
Total	276	299,582,608	100.0	128,217	25.1	0.0	4.9	16.5	2.2	16.5	18.8	10.9	22.3	39.7	58.7	41.6	0.0	28.3	14.7	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020-21

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NY MMSA	1,364	221,945	100.0	403,025	5.2	1.3	5.3	19.2	8.2	19.3	34.9	48.3	33.7	38.7	41.9	39.5	2.1	0.3	2.2
Total	1,364	221,945	100.0	403,025	5.2	1.3	5.3	19.2	8.2	19.3	34.9	48.3	33.7	38.7	41.9	39.5	2.1	0.3	2.2

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NY MMSA	157	29,395	100.0	358,986	5.5	3.8	5.8	17.9	13.4	18.3	35.6	56.7	34.7	36.8	22.9	37.1	4.1	3.2	4.0
Total	157	29,395	100.0	358,986	5.5	3.8	5.8	17.9	13.4	18.3	35.6	56.7	34.7	36.8	22.9	37.1	4.1	3.2	4.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY MMSA	1,364	221,945	100.0	403,025	91.2	8.9	36.4	3.7	11.0	5.2	80.1
Total	1,364	221,945	100.0	403,025	91.2	8.9	36.4	3.7	11.0	5.2	80.1
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY MMSA	157	29,395	100.0	358,986	91.5	38.2	48.8	3.4	61.1	5.1	0.6
Total	157	29,395	100.0	358,986	91.5	38.2	48.8	3.4	61.1	5.1	0.6
<i>Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											