



PUBLIC DISCLOSURE

October 02, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

NBT Bank, National Association
Charter Number: 1354

52 South Broad Street
Norwich, NY 13815

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite A132
East Syracuse, NY 13057

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

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Overall CRA Rating

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

The following table indicates the performance level of NBT Bank, N.A. with respect to the Lending, Investment, and Service Tests:

Performance Levels	NBT Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on High Satisfactory ratings in all seven rating areas.
- The Investment Test rating is based on High Satisfactory ratings in all seven rating areas.
- The Service Test rating is based on High Satisfactory performance in four ratings areas including the two largest rated areas, the states of New York and Pennsylvania, and Low Satisfactory ratings in three rated areas.

Lending in Assessment Area

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

The bank originated and purchased 92 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.

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	7,340	94.4	438	5.6	7,778	1,782,426	88.0	242,780	12.0	2,025,206
Small Business	9,482	90.2	1,032	9.8	10,514	1,105,369	81.7	247,663	18.3	1,353,032
Small Farm	610	93.6	42	6.4	652	42,864	88.4	5,620	11.6	48,484
Total	17,432	92.0	1,512	8.0	18,944	2,930,659	85.5	496,063	14.5	3,426,721

Description of Institution

NBT Bank, N. A. (NBT) is a multi-state community bank formed in 1856 and wholly owned by NBT Bancorp Inc., which is headquartered in Norwich, NY. NBT reported total assets of \$11.7 billion as of December 31, 2022. NBT Bancorp Inc. (NBTB) was formed in 1986 and is traded on the NASDAQ under the NBTB symbol. NBTB is primarily operated through NBT and two financial services companies – EPIC Advisors, Inc. and NBT Insurance Agency, LLC. EPIC Advisors, Inc. is a retirement plan administrator based in Rochester, NY. NBT Insurance Agency, LLC, is a full-service insurance agency based in Norwich, NY.

NBT's strategy during the evaluation period focused on organic loan and deposit growth in all AAs with acquisition activity focused on wealth management services. NBT's business activities included commercial banking, retail banking, and wealth management services provided to customers in its market areas through 140 branches, 186 automated teller machines (ATMs), online banking, and mobile banking. As of December 31, 2022, NBT reported total loans and leases of \$8.15 billion, representing 69.2 percent of total assets. Loan portfolio composition was as follows: 34.2 percent residential real estate loans - including multifamily and home equity products, 25.8 percent consumer loans, 24.1 percent commercial real estate loans, 14.5 percent commercial/industrial loans, and 0.01 percent Payment Protection Program (PPP) loans. Consumer loans consisted mainly of auto loans and specialty loans for medical, educational, and renewable energy purposes. Deposits totaled \$9.6 billion, and tier 1 capital totaled \$1.2 billion. NBT also reported \$3.9 billion in fiduciary assets and \$2.3 billion in custody and safekeeping.

Over the evaluation period, NBT had 15 AAs over seven states. The AAs include one in southern Maine, one in western Massachusetts, two in southern New Hampshire, five in central and northeastern New York, three in northeastern Pennsylvania, one in Connecticut, and two in Vermont. As of December 31, 2022, branch locations included one in Maine, five in Massachusetts, four in New Hampshire, 100 in New York, 25 in Pennsylvania, three in Vermont, and two in Connecticut. During the evaluation period, NBT closed one branch in New Hampshire, five branches in New York, three branches in Pennsylvania, and one branch in Vermont. NBT opened one branch in New Hampshire and two branches in Connecticut. NBT also opened and relocated a branch in New York. Throughout the evaluation period, NBT maintained the same AAs in Massachusetts, Maine, New York, and Pennsylvania. The AAs were reduced in Vermont and New Hampshire due to branch closings. And finally, an AA was added in Connecticut due to two branch openings. NBT's AAs met the regulatory definition and did not arbitrarily exclude low- or moderate-income census tracts.

NBT's prior Performance Evaluation was dated September 21, 2020, and resulted in a Satisfactory rating based on High Satisfactory ratings for the Lending Test, Investment Test, and Service Test. NBT does not have any legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the Large Bank Lending, Investment, and Service Tests. The evaluation period was January 1, 2020, through December 31, 2022.

The OCC evaluated the bank's lending performance by reviewing home mortgage loan products reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and small loans to farms reported under the CRA, and Community Development (CD) loans.

The bank's primary lending products are home mortgage and small businesses loans. Farm lending is not a primary product of the bank, and in many bank markets, the volume of farm lending during the evaluation period was insufficient (less than 20 loans) to conduct a meaningful analysis. Consumer lending (non-mortgage) was not considered in this evaluation, as consumer loans did not constitute a substantial majority of the bank's lending and bank management did not request consideration of these loans.

This evaluation period included two census periods. For mortgage lending activity in 2020-2021, the OCC compared the bank's performance to the HMDA aggregate lender data as well as the 2015 American Community Survey (ACS) census data. For mortgage lending activity during 2022, the OCC compared the bank's performance to the aggregate lender data and the 2020 census data, which the FFIEC released in 2022. Our analysis of small business lending in 2020-2021 focused on comparison of the bank's performance with 2021 data from Dunn & Bradstreet (D&B) and comparison to aggregate CRA (small business) data. In 2022, our analysis of small business lending focused on comparison with 2022 D&B data. The 2022 aggregate CRA lender data had not been published on the date of this evaluation.

The Investment Test considers the bank's qualified CD investments, as well as grants and donations that were made during the evaluation period. Prior period investments that remain outstanding and continue to benefit the bank's AAs were also considered at the year-end 2022 book value. The level of qualified investments in comparison to allocated tier 1 capital, based on the pro rata share of AA deposits, received the most weight in determining the rating. For full-scope areas, the OCC also considered the complexity or innovativeness of the investments, the responsiveness of the investments to community development needs, and the bank's demonstrated leadership.

Service Test performance considers both retail services and CD services. For retail services, the geographic distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies along with the impact of branch openings and closings were given the most weight. In full-scope AAs, consideration was given to middle- and upper-income (MUI) branches located near low- and moderate-income (LMI) areas. It also considers the availability and effectiveness of alternative delivery systems (ADS) for delivering retail banking services including ATMs, online banking, and mobile banking. The distribution of ATMs among low-, moderate-, middle-, and upper-income geographies was evaluated similar to the branch distributions. Branch hours and the range of services provided in low-, moderate-, middle-, and upper-income geographies received a lesser amount of weight in the full-scope areas and were not considered in the limited-scope areas. Finally, the level and responsiveness of CD services was evaluated in full-scope areas.

Selection of Areas for Full-Scope Review

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

details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings. In arriving at overall conclusions, two rating areas carry the most weight as they account for 93.6 percent of the bank's deposits. These include the state of New York (79.4 percent) and the state of Pennsylvania (14.2 percent). All other rated areas individually account for less than three percent of the bank's deposit base. State ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Other information

COVID-19 Response

Beginning in early 2020, the global economy was adversely affected by the COVID-19 pandemic, which spread worldwide and caused deteriorating economic conditions resulting from stay-at-home orders and businesses shutting down to lessen the spread and impact of the virus. NBT responded to customers facing financial hardship during the pandemic by providing relief in the form of increasing ATM limits; loan forbearance and modifications; waiving early withdrawal penalties on CDs; eliminating excessive activity fees; waiving late fees; and participating in the Small Business Administration's (SBA) Payment Protection Program, which provided small and mid-sized businesses impacted by the pandemic with funds to cover payroll costs and other expenses. Specifically, NBT's pandemic response included the following:

- Processed 1,035 loan modifications and forbearance requests totaling \$137.9 million, of which 801 totaling \$121 million were for residential mortgage.
- Processed 6,061 PPP loans providing over \$830 million in critical funding to businesses.

NBT CEI-Boulos Impact Fund, LLC

In 2022, NBT launched the NBT CEI-Boulos Impact Fund, LLC. The Impact Fund is a \$10 million real estate equity investment fund with NBT as the sole investor. The fund will target high-impact projects located within the bank's AAs in the state of New York. The fund plans to make equity investments of \$1 to \$5 million per project. The use of these funds is expected to help in various ways such as to create jobs, affordable and workforce housing, and Main Street revitalization. The fund is managed by CEI-Boulos Capital Management, LLC.

As of December 31, 2022, NBT bank staff with the assistance of CEI-Boulos staff have established an Investment Committee for review of opportunities, established an Advisory Board for review of approved opportunities, and had begun reviews on 40 potential opportunities.

Innovative and Flexible Products/Programs

NBT offers a variety of flexible home mortgage products. These products offer borrowers flexibility with financing from 95-100 percent, no or low-down payments, and flexible loan terms. Over the evaluation period, NBT funded 370 loans through these products. These products include:

- Housing Agency
- State of New York Mortgage Agency (SONYMA) for Homebuyers
- Home in The City
- CRA 97
- Portfolio 97
- FHA
- USDA Rural Guaranteed

NBT also participates in Federal Home Loan Bank Affordable Housing Programs. These include:

- Homebuyer Dream Program - Through this program NBT helps borrowers with down payment, closing costs, counseling assistance, or as rehabilitation assistance to homeowners. During the evaluation period NBT assisted 75 individuals.
- Competitive Application Program - Through this program NBT assists community organizations and housing developers to create rental or homeownership opportunities for lower- income households. During the evaluation period NBT participated in 7 applications leading to the addition of 224 units of affordable housing in its communities.

NBT is also a SBA lender. As a SBA lender the bank develops new business relationships and provides capital to businesses that would not otherwise qualify for traditional financing. Over the evaluation period NBT originated 77 SBA loans totaling \$44.7 million.

NBT offers a variety of transaction products that are beneficial to low- and moderate- income individuals. Classic Checking is offered with no monthly maintenance fee and no minimum balance requirement. NBT iSelect Checking Certified BankOn account is offered with no monthly maintenance fee, no minimum balance requirements, and free digital banking. The account is designed for individuals looking to create a stable financial foundation, simplify banking, save on fees, and re-build a positive checking relationship for first time checking customers and those that do not want to overdraw their accounts. This account does not get overdraft charges. Assist Checking is geared to serve individuals with developmental disabilities and has no monthly maintenance fee, no minimum balance requirement, and checks at no charge. Statement Savings Account is offered with no monthly maintenance fee and requires a balance of \$25 to earn interest. Holiday Club is a savings account to help individuals save for the holidays. No monthly maintenance fee and a minimum balance of \$0.01 to earn interest.

NBT supports financial literacy through its Strive Literacy program. The Strive program offers a comprehensive financial literacy curriculum available to all local school districts, colleges, and non-profits for classroom-based education. NBT has developed resources specifically to help parents and educators take an active role in supporting youth on their journey to financial independence. The curriculum includes topics such as:

- Introduction to Checking
- Build Your Savings Skills
- Anatomy of a Debit Card
- Introduction to Online Banking
- The Ins and Outs of Budgeting
- Introduction to Credit
- Anatomy of a Credit Card

NBT offers the NBT@Work program which is designed to strengthen their current client relationship by providing solutions to their banking and investment needs through the delivery of onsite education workshops, one-on-one financial coaching, planning tools, and savings strategies to help customers reach their financial goals.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

STATE OF CONNECTICUT

CRA rating for the state of Connecticut: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity, overall good geographic and borrower distribution of lending
- A relatively high level of CD services
- Excellent level of CD investments
- Reasonably accessible retail service delivery systems given the bank's entry into Connecticut during the evaluation period

Description of Institution's Operations in the state of Connecticut

NBT delineated one AA in the state of Connecticut consisting of the entire Hartford-East Hartford-Middletown MSA (Hartford MSA).

As of year-end 2022, NBT had two branch locations and one ATM, which is deposit-taking, within the Hartford MSA. The branches were opened on May 17, 2021 (Glastonbury) and June 7, 2021 (West Hartford). Prior to the branches opening, the bank maintained a loan production office from early 2020. During the evaluation period, the bank originated and purchased \$76 million or 2.6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in the AA.

The state of Connecticut represented NBT's sixth largest rated area in terms of deposits. Based on June 30, 2022, FDIC Summary of Deposit information, NBT had \$36.9 million in deposits, which represented 0.4 percent of the bank's adjusted total deposits. The bank ranked 50th in deposit market share with 0.02 percent out of 54 depository institutions. The top three competitors had 53.3 percent of the market share and included Bank of America, N.A. with 90 branches and a 25.0 percent market share, Webster Bank, N.A. with 96 branches and 14.5 percent market share, and Manufacturers and Traders Trust Company with 166 branches and a 13.9 percent market share.

Hartford MSA

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hartford MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	290	15.9	14.8	36.6	30.7	2.1
Population by Geography	1,214,056	12.5	14.1	37.7	34.3	1.3
Housing Units by Geography	507,998	13.2	14.9	39.3	32.6	0.0
Owner-Occupied Units by Geography	313,532	3.7	10.9	42.5	42.8	0.0
Occupied Rental Units by Geography	153,414	29.5	22.5	33.3	14.7	0.1
Vacant Units by Geography	41,052	24.3	17.2	37.1	21.4	0.1
Businesses by Geography	141,476	10.7	12.9	39.8	36.2	0.3
Farms by Geography	4,188	3.9	8.9	41.1	46.1	0.0
Family Distribution by Income Level	306,718	22.3	16.5	20.7	40.5	0.0
Household Distribution by Income Level	466,946	25.7	14.8	17.3	42.2	0.0
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$88,016	Median Housing Value			\$238,867
				Median Gross Rent		\$1,005
				Families Below Poverty Level		7.7%

Source: 2015 ACS and 2021 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hartford MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	308	13.0	16.9	40.6	26.6	2.9
Population by Geography	1,213,531	10.1	16.5	42.2	30.5	0.7
Housing Units by Geography	516,829	10.7	17.3	43.5	28.2	0.2
Owner-Occupied Units by Geography	316,870	3.0	12.2	47.9	36.9	0.0
Occupied Rental Units by Geography	160,625	23.9	26.9	36.3	12.5	0.4
Vacant Units by Geography	39,334	18.8	19.8	37.6	22.4	1.3
Businesses by Geography	161,303	8.8	15.0	45.4	30.0	0.8
Farms by Geography	4,591	4.0	9.5	46.3	40.2	0.0
Family Distribution by Income Level	305,104	22.2	16.8	20.9	40.0	0.0
Household Distribution by Income Level	477,495	25.5	15.3	17.0	42.2	0.0
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$101,543	Median Housing Value			\$247,198
				Median Gross Rent		\$1,148
				Families Below Poverty Level		6.6%

Source: 2020 U.S. Census and 2022 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

The Hartford MSA AA consisted of all three counties in the Hartford MSA, being Hartford, Middlesex, and Tolland counties. This was a new AA in 2021, as in May and June of 2021, NBT established two branches in the Hartford MSA AA. As of year-end 2022, NBT operated two branches and one deposit-taking ATM in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT had \$36.9 million in deposits in the AA. NBT had 0.06 percent deposit market share, which ranked 25th among all institutions. Competition was extensive with 28 total FDIC insured financial institutions operating 305 offices in the AA. The top three competitors had 67.6 percent of the market share and included Bank of America, N.A. with 31 branches and 46.3 percent market share, Manufacturers and Traders Trust Company with 56 branches and 12.1 percent market share, and Webster Bank, N.A. with 39 branches and 9.3 percent market share.

Based on information from the May 2023 Moody's Analytics report, during the evaluation period, the Hartford AA's economy saw a mixed post COVID-19 rebound with some slowing in 2022, closely tracking the national economy. Area strengths included a well-educated workforce, above-average wages, lower living and business costs, particularly when compared to the nearby major metropolitan areas of Boston and New York, and affordable housing. The MSA experienced a consistent decline in population over the past eight years and has had a below-average presence of working-age residents. Of those employed, the majority of the workforce in the MSA were in the public sectors of educational and health services with 18.3 percent, professional and business services with 13.8 percent, and manufacturing with 10.2 percent. The top employers included Hartford Healthcare, Pratt & Whitney/United Technologies, and University of Connecticut, although, University of Connecticut reduced the number of faculty positions in lieu of providing current employees with wage increases. Fifteen percent of workers were employed by government entities, with the majority being between state and local offices, despite exposure to job loss in state government. Leading industries by wage in the MSA included insurance carriers, aerospace production and manufacturing, and physicians, all of which require higher levels of specialized employees. Housing is still considered affordable, although prices are increasing and affordable home ownership is coming close to state and U.S. levels while rents, still more affordable than the rest of the country, are now in line with the rest of Connecticut.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Hartford MSA was 4.2 percent, compared to 6.3 percent in 2021. The Hartford MSA's annual unemployment rate was consistent with that of the state of Connecticut in 2021 and 2022, which were also 6.3 percent and 4.2 percent, respectively. The lower unemployment level reflects steady labor force declines until 2021 and a post COVID-19 return to normal employment levels in the lower paying, leisure and hospitality sector. This sector saw year-over-year growth of 18 percent at the end of April 2022 and 6.7 percent at the end of October 2022. In 2021, the Hartford AA saw the first net gain in the labor force since at least 2018 as remote work became more accepted and housing and rental costs in the Hartford MSA were significantly lower than nearby New York and Boston. This may also have contributed to the increased value of housing starting in 2020.

Based on FFIEC median family income ranges, low-income families earned less than \$56,600 and moderate-income families earned between \$56,660-\$90,560 within the MSA. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. In the Hartford MSA, this is calculated to a maximum monthly mortgage payment of \$1,415 for low-income borrowers and \$2,264 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly

mortgage payment for a home at the MSA median housing value would be \$1,959. Most low-income income borrowers would be unable to afford a mortgage loan in this AA, while most moderate-income borrowers would be able to afford a mortgage in the AA.

The OCC relied on information provided from a regulatory listening session conducted early in the evaluation period and one community contact completed after the evaluation period that referenced ongoing community needs. The listening session and contact discussion were held to understand Hartford MSA community development needs. The listening session's ten participants were organizations focused on social services, social justice, mental health, affordable housing, poverty eradication and job training in the Hartford MSA. Opportunities noted in the listening session included needs for more affordable childcare, greater credit history leeway in approving small business loans, banking relationships for low-income persons and small businesses, particularly those that are minority owned, greater banker participation on non-profit boards, particularly in New Britain, and more banking assistance in credit repair and education.

The community contact's focus was in providing food, housing, and health related services to low- and moderate-income persons in the city of Hartford. The contact noted that Hartford is one of the poorest cities in the United States and stated that financial institutions needed to do a better job in community outreach efforts particularly in the provision of financial education targeted to persons who are at, or below poverty income levels. The contact also observed there is a need for greater ease in the process of financing and constructing affordable housing. Finally, the contact noted the need for greater philanthropic donations from financial institutions, including giving to flexible funds used to combat homelessness.

Scope of Evaluation in the State of Connecticut

The OCC completed a full-scope review for the Hartford MSA as it is the only AA served by NBT in the state of Connecticut.

In arriving at overall conclusions, the OCC placed more emphasis on the product category that had the higher percentage of lending in the AA. For the Hartford MSA, the OCC placed more emphasis on small loans to businesses. The OCC did not evaluate small loans to farms in the Hartford MSA as there were no loans in the AA to conduct an analysis for the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford MSA is good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Hartford MSA

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Hartford MSA	39	73	0	3	115	100.0	100.0
Total	39	73	0	3	115	100.0	100.0

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

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Hartford MSA	37,552	27,556	0	10,575	75,683	100.0	100.0
Total	37,552	27,556	0	10,575	75,683	100.0	100.0

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

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT ranked 25th out of 28 depository institutions (11th percentile) with a deposit market share of 0.06 percent.

Based on the 2022 HMDA market share data, NBT ranked 127th out of 528 lenders (75th percentile) with a market share of 0.09 percent for home mortgage loans. The top three lenders were Rocket Mortgage with 4.6 percent market share, Liberty Bank with 4.4 percent market share, and American Eagle FCU with 4.4 percent market share.

Based on the 2021 CRA small business loan data, NBT ranked 59th out of 181 lenders (67th percentile) with a market share of 0.08 percent for small loans to businesses. The top three lenders were American Express with a 16.8 percent market share, Bank of America N.A. with a 10.1 percent market share, and Webster Bank N.A. with an 8.0 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The OCC generally placed more emphasis on the bank's performance in low-income geographies as these areas had a greater needs per community contact information.

Hartford MSA

Home Mortgage Loans

Refer to Table O in the state of Connecticut 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.

2021

The bank did not make enough home mortgage loans the during the period in 2021 to perform a meaningful analysis.

2022

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of Connecticut 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.

2021

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in the low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies was significantly below the percentage of businesses located in moderate-income geographies. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies, was significantly below, the aggregate percentage of all reporting lenders.

2022

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was significantly below, the percentage of businesses located in those geographies.

While the bank had a lending presence in the market in early 2020, its branches were not established until mid-2021. The bank continues to establish a market presence as reflected in its market share of lending and deposits in the Hartford MSA AA. The bank's stronger showing in low-income census tracts outpaced existing market players in 2021 and continued with strong low-income geographies market penetration in 2022. Moderate-income geography penetration, while significantly below the percentage of businesses located in those tracts in 2021 and 2022, improved year-over-year as the bank continued to establish market presence.

Lending Gap Analysis

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

Hartford MSA

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Hartford MSA

Home Mortgage Loans

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

2021

The bank did not make enough home mortgage loans the during the period in 2021 to perform a meaningful analysis.

2022

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low- and moderate-income borrowers exceeded the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

2021

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

The OCC considered the bank's 2021 entrance into this market, limited market share, and significant competition. Collectively, the top 10 lenders account for 70.8 percent of the market share and represent significant competition from credit card companies. The OCC also considered the impact of small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 10 percent of small loans to businesses in the Hartford MSA. All loans with unknown revenue in the Hartford MSA were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA.

The OCC considered the bank's 2021 entrance into this market and the increase year-over-year in the bank's percentage of loans compared to the percentage of small businesses in the AA. The OCC also considered limited market share and significant competition. Collectively, the top ten lenders account for 70.8 percent of the market share and represent significant competition from credit card companies.

Hartford MSA AA

Community Development Lending

The institution is a leader in making CD loans.

The lending activity table, 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.

Hartford MSA AA

The level of CD lending was excellent. NBT made three CD loans totaling over \$10.5 million, which represented over 100 percent of allocated tier 1 capital. The loans were considered responsive to identified community needs of providing affordable housing, of which one loan was targeted for disabled individuals, and stabilization and revitalization efforts.

By dollar volume, 82.1 percent of CD loans funded affordable housing and 17.9 percent funded revitalization and stabilization activities. The CD loans include:

- A \$8.0 million bridge line of credit funding the construction or renovation of one- to four-family housing for disabled individuals who are supported by state agencies in Connecticut and Massachusetts. Given disabilities and state sponsorship, the occupants are low- and moderate-income individuals.
- A \$1.9 million loan to purchase a mixed-use building with 39 apartments and five retail spaces. Apartments rents were below market rates and will be increased with renovation. The property is located in an Opportunity, Revitalization and Transit Oriented Development Zone and the retail space is expected to create and or retain jobs while revitalizing the neighborhood.
- A \$658,000 portion of a \$1.8 million loan, representing three affordable units in an eight-unit apartment building being constructed in the AA.

Product Innovation and Flexibility

Hartford MSA AA

The institution made no use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The institution's performance under the Investment Test in Connecticut is rated High Satisfactory.

Conclusions for Hartford MSA AA Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford MSA is good.

Number and Amount of Qualified Investments

Qualified Investments*										
Hartford MSA	Prior Period**		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Hartford MSA	0	0	34	1,096	34	100.0	1,096	100.0	0	0
Total	0	0	34	1,096	34	100.0	1,096	100.0	0	0

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

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.

Hartford MSA AA

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

During the evaluation period, NBT made one investment totaling \$1.0 million and provided 33 qualifying grants and donations totaling \$96,250. The dollar volume of current investments represented 26.6 percent of tier 1 capital allocated to the AA. There were no prior period investments given the bank moved into the market during the evaluation period.

The bank exhibited excellent responsiveness to credit and community economic development needs. The \$1.0 million investment was particularly responsive to affordable housing needs supporting 138 units of affordable housing in the Hartford MSA AA. Volume wise, donations tended to focus on community services with approximately one-third of funding helping youth in New Britain, while economic development donations tended to be to entities that support the development of entrepreneurs in an inclusive manner. By dollar volume, 92.6 percent of current period investments and donations funded affordable housing, 5.7 percent funded community services to LMI individuals, and 1.7 percent funded economic development.

The institution did not use innovative and/or complex investments to support CD initiatives.

Examples of qualified investments and grants in the AA include:

- A \$1.0 million investment in a Freddie Mac Structured Pass-through security funding affordable apartments across the country. This included a 138-unit apartment complex in the Hartford MSA where 14 units are for low-income families and the remaining units are designated for moderate-

income families. Additionally, NBT donated an \$16,300 to organizations that support affordable housing needs.

- Donations supporting community services amounted to \$52,300 and included \$15,500 to a youth organization that provides a gathering location for kids that might otherwise be susceptible to fewer positive influences.
- Donations supporting economic development totaled \$19,000. The donations were almost equally divided between entities that promote and support entrepreneurship and funds for a local college supporting a program for women owned small business.

SERVICE TEST

The institution’s performance under the Service Test in Connecticut is rated Low Satisfactory.

Conclusions for Hartford MSA Receiving a Full-Scope Review

Based on a full-scope review the bank’s performance in the Hartford MSA is adequate.

Retail Banking Services

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

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
Full-Scope											
Hartford MSA	100.0	2	100.0	0.0	0.0	1.0	1.0	12.5	14.1	37.7	34.3
Total	100.0	2	100.0	0.0	0.0	1.0	1.0	12.5	14.1	37.7	34.3

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

The bank’s distribution of branches does not include any branches in low- or moderate-income geographies. The OCC further considered that the Glastonbury Branch, although located in a middle-income census tract, serves two moderate-income census tracts that it is located near, thus having a positive impact on the retail service test conclusion.

NBT offered ADS including ATMs, self-service telephone banking, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. NBT had one ATM in the AA, located at the Glastonbury branch, which was deposit taking. Therefore, the bank had poor distribution of ATMs in low- and moderate-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope						
Harford MSA	2	0	0	0	1	1
Total	2	0	0	0	1	1

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

During the evaluation period, the bank entered the Hartford MSA with the opening of two branches. While neither of the branches are in LMI geographies, this did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

Services, including where appropriate, and business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. NBT maintained standard business hours at both branch locations in the AA. However, the Glastonbury branch operates for one extra hour in the evening from 9:00 a.m. to 5:00 p.m. Monday through Friday and offers three hours of banking on Saturdays, from 9:00 a.m. to 12:00 p.m. It also has a drive through with hours matching those of the branch. NBT offered traditional banking products and services at all branch locations in the AA except for safe deposit boxes and night deposit services which weren't available.

Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, NBT provided 11 CD service activities to four organizations in the Hartford MSA. Leadership was evident through board or committee participation with two bank employees providing 288 service hours over the evaluation period. The bank's services were responsive to identified needs in the AA of affordable housing, community services, and economic development.

Examples of CD services in the AA include:

- One employee sat on the board and was president of a local organization that helps to provide affordable housing to the elderly, providing 124 service hours during the evaluation period.
- One employee sat on the board of a not-for-profit that fights poverty and provides service in effort to help improve low-income communities and persons, providing 58 service hours during the evaluation period.
- One employee sat on the board of an organization focused on providing affordable housing and counseling to LMI individuals, providing 66 services hours during the evaluation period.

STATE OF MAINE

CRA rating for the state of Maine: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity and geographic distribution and adequate borrower distribution of lending
- A relatively high level of CD services
- Excellent level of CD investments
- Reasonably accessible retail service delivery systems

Description of Institution's Operations in the state of Maine

NBT delineated one AA in the state of Maine consisting of the Portland-South Portland MSA AA (Portland MSA) in its entirety.

As of year-end 2022, NBT had one branch location within the AA equipped with one deposit-taking ATM. During the evaluation period, the bank originated and purchased \$200 million or 6.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

The state of Maine represented NBT's seventh largest rated area in terms of deposits. Based on June 30, 2022, FDIC summary of deposit information, NBT had \$35.5 million in deposits, which represented 0.35 percent of the bank's adjusted total deposits. The bank ranked 29th in deposit market share with 0.08 percent out of 29 depository institutions. The top three competitors had 36.3 percent of the market share and included TD Bank, N.A. with 39 branches and 13.3 percent market share, Bangor Savings Bank with 61 branches and 12.5 percent market share, and The Camden National Bank with 57 branches and 10.6 percent market share.

Portland MSA

The following tables provides a summary of the demographics, including housing and business information for the Portland MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Portland MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	117	3.4	22.2	53.0	18.8	2.6
Population by Geography	520,893	2.7	21.0	56.3	20.0	0.0
Housing Units by Geography	265,113	2.6	22.7	56.2	18.5	0.0
Owner-Occupied Units by Geography	150,789	0.9	16.4	60.5	22.3	0.0
Occupied Rental Units by Geography	63,878	7.6	36.0	44.1	12.4	0.0
Vacant Units by Geography	50,446	1.5	24.7	58.6	15.1	0.0
Businesses by Geography	43,648	2.6	26.1	50.2	21.2	0.0
Farms by Geography	1,515	1.0	14.9	62.0	22.2	0.0
Family Distribution by Income Level	134,957	20.7	17.8	21.8	39.7	0.0
Household Distribution by Income Level	214,667	23.9	16.2	18.1	41.8	0.0
Median Family Income MSA – 38860 Portland-South Portland, ME MSA		\$74,701	Median Housing Value			\$248,747
			Median Gross Rent			\$941
			Families Below Poverty Level			7.2%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Portland MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	149	0.7	22.1	53.0	22.1	2.0
Population by Geography	551,740	0.4	19.8	53.7	26.1	0.0
Housing Units by Geography	275,836	0.4	22.0	53.9	23.8	0.0
Owner-Occupied Units by Geography	163,073	0.1	17.7	55.2	27.0	0.0
Occupied Rental Units by Geography	63,254	1.3	29.3	49.7	19.7	0.0
Vacant Units by Geography	49,509	0.1	27.0	54.6	18.3	0.0
Businesses by Geography	54,364	0.2	20.4	54.6	24.8	0.0
Farms by Geography	1,738	0.1	16.9	56.8	26.2	0.0
Family Distribution by Income Level	139,302	18.4	18.2	24.1	39.4	0.0
Household Distribution by Income Level	226,327	23.6	16.2	19.0	41.2	0.0
Median Family Income MSA – 38860 Portland-South Portland, ME MSA		\$89,988	Median Housing Value			\$295,700
			Median Gross Rent			\$1,112
			Families Below Poverty Level			4.9%
<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>						

The Portland MSA AA consisted of all three counties in the MSA, which includes Cumberland, Sagadahoc, and York counties. As of year-end 2022, NBT had one branch location equipped with a deposit-taking ATM within the AA.

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT had \$35.5 million in deposits in the AA. NBT had 0.17 percent deposit market share, which ranked 19th among all institutions. Competition was normal with 23 total FDIC insured financial institutions operating 190 offices in the AA. The top three competitors had 41.3 percent of the market share and included TD Bank, N.A. with 20 branches and 16.8 percent market share, Bank of America, N.A. with 12 branches and 13.9 percent market share, and KeyBank, N.A. with 17 branches and 10.6 percent market share.

Based on information from the May 2023 Moody's Analytics report, economic growth within the Portland MSA stalled in comparison to regional and national levels. Industries that were once top drivers of the economy, such as healthcare, manufacturing, and leisure/hospitality have slowed. The key driver of the economy within the MSA is healthcare services, particularly medical services for the aging population. Strengths of the MSA include coastal and urban amenities that attract tourists and vacation home buyers, a well-educated workforce with a high share of telecommuters, and below average employment volatility. Weaknesses include high business costs, an unfavorable age structure, and a reliance on nonresident spending. Major employers include Maine Health, Bath Iron Works Corp., and Hannaford Bros Co., along with federal and local government. Relative to housing, prices were appreciating faster in the MSA than in the state and nationally after a brief decline in the first half of 2022; however, the MSA still maintained a slightly greater affordability compared to the state and nation.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Portland AA was 2.5 percent, compared to 5.0 percent in 2020, and 4.1 percent in 2021. Higher unemployment rates in 2020 and 2021 can be attributed to the COVID-19 pandemic. Portland's unemployment rate compared favorably to the 3.0 percent unemployment rate for the state of Maine in 2022.

Based on FFIEC median family income ranges, low-income families earned less than \$50,800 and moderate-income families earned between \$50,800-\$81,280 within the MSA. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,270 for low-income borrowers and \$2,032 for moderate-income borrowers. Assuming a 30-year mortgage with a five 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 \$2,971 in the MSA. This illustrates that low-income and moderate-income borrowers would be challenged or unable to afford a mortgage loan in this AA. The housing value in the AA increased from \$395,000 in 2020 to \$553,500 in 2022, reflecting a percent change of 40.1 percent according to Realtor.com data.

The OCC relied on information provided from two community contacts to understand area needs and opportunities. The contacts represented organizations focused on affordable housing. Contacts indicated there is a shortage of housing in the MSA and what is available is not affordable for a typical family. In addition to homeownership being unaffordable, one contact stated that market rent prices are unaffordable as well. Both contacts expressed opportunities for banks in the MSA included providing outreach programs and financial education programs to the increasing immigrant population; however, language barriers pose challenges. Additional opportunities identified relating to the need for housing

included grants and investments into resident services, housing rehabilitation, and construction financing.

Scope of Evaluation in the state of Maine

The OCC completed a full-scope review for the Portland MSA as it is the only AA served by NBT in the state of Maine.

In arriving at overall conclusions, the OCC placed more emphasis on the product category that had the higher percentage of lending in the AA. For the Portland MSA, the OCC placed more emphasis on small loans to businesses than home mortgage loans. The OCC did not evaluate small loans to farms in the Portland MSA as there were no loans in the AA to conduct an analysis for the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MAINE

LENDING TEST

The bank’s performance under the Lending Test in Maine is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Portland MSA AA is good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Portland MSA	40	56	0	9	105	100.0	100.0
Total	40	56	0	9	105	100.0	100.0

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

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Portland MSA	187,282	12,736	0	54,437	244,418	100.0	100.0
Total	187,282	12,736	0	54,437	244,418	100.0	100.0

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

Portland MSA

According to the FDIC’s Summary of Deposits as of June 30, 2022, NBT ranked 19th out of 23 depository institutions (17th percentile) with a deposit market share of 0.17 percent.

Based on the 2022 HMDA market share data, NBT ranked 159th out of 408 lenders (61st percentile) with a market share of 0.04 percent for home mortgage loans. The top three lenders were Bangor Savings

Bank with 7.3 percent market share, United Wholesale Mortgage with 4.7 percent market share, and The Camden National Bank with 3.7 percent market share.

Based on the 2021 CRA small business loan data, NBT ranked 50th out of 117 lenders (57th percentile) with a market share of 0.12 percent for small loans to businesses. The top three lenders were American Express National Bank with 16.0 percent market share, Bangor Savings Bank with 8.3 percent market share, and JP Morgan Chase, N.A. with 8.1 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. The OCC generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Portland MSA

Home Mortgage Loans

Refer to Table O in the state of Maine 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.

2020-2021

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

2022

The OCC did not evaluate 2022 HMDA data in the Portland MSA, as there were not enough loans in the AA to conduct a meaningful analysis.

Small Loans to Businesses

Refer to Table Q in the state of Maine 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.

2020-2021

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, but in moderate-income geographies exceeded the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, but in moderate-income geographies exceeded the aggregate percentage of all reporting lenders. The percentage of small businesses in low-income census tracts represented 2.6 percent of all small businesses within the AA. The OCC considered the limited number of small businesses in low-income

census tracts in the assessment of the bank's performance as well as competition within the AA that resulted in restricted lending opportunities for the bank.

2022

The OCC did not evaluate 2022 small business data in the Portland MSA, as there were not enough loans in the AA to conduct a meaningful analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Portland MSA

Home Mortgage Loans

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

2020-2021

The distribution of home mortgage loans among individuals of different income levels was adequate. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers was below, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers was below, the aggregate percentage of all reporting lenders. The OCC considered increased housing costs in relation to median family incomes in the AA, as well as the lack of affordable housing inventory, and the significant barrier that it placed on lending opportunities to low- and moderate-income individuals.

2022

The OCC did not evaluate 2022 HMDA data in the Portland MSA, as there were not enough loans in the AA to conduct a meaningful analysis.

Small Loans to Businesses

Refer to Table R in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

2020-2021

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA as well as being below the aggregate percentage of all reporting lenders.

The OCC considered significant competition and the bank's limited market share for small loans to businesses. Collectively, the top ten lenders in the AA account for 67.4 percent of the market share and represent significant competition from credit card companies. The OCC considered the impact of small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 53.3 percent of small loans to businesses in the Portland MSA, with 20.8 percent of these being PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The OCC did not evaluate 2022 small business data in the Portland MSA, as there were not enough loans in the AA to conduct a meaningful analysis.

Community Development Lending

The institution is a leader in making 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.

Portland MSA

The level of CD lending was excellent. NBT made nine CD loans totaling \$54.4 million, which represented over 100 percent of allocated tier 1 capital. CD loans were responsive to the identified community needs of affordable housing and community services. Of the nine CD loans originated by the bank, four loans totaling \$11.4 million supported affordable housing needs in the AA, three loans totaling \$32 million supported organizations that provide community services in the AA that benefit LMI individuals, and two loans totaling \$11.0 million funded revitalization and stabilization efforts.

By dollar volume, 58.7 percent of CD loans funded community services, 21.0 percent funded affordable housing, and 20.3 percent funded revitalization and stabilization. There were no loans funded for economic development activities during the evaluation period.

Examples of CD loans in the AA include:

- Three loans totaling \$32 million to one community service organization to finance the construction of a community-based outpatient clinic to provide health services for low- and moderate-income veterans in a moderate-income geography.
- Two loans totaling \$11.0 million to an organization to finance the redevelopment of two historical buildings, of which 10 percent of the buildings' 71 units will be reserved as affordable

housing units in exchange for TIF funding. The rent on these units is capped to 100 percent of the area’s median income.

- Two loans totaling \$1.8 million to an affordable housing organization to be used for the rehabilitation of a 20 unit rental complex for the elder low-income population.

Product Innovation and Flexibility

Portland MSA

The institution made no use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative and flexible products considered during the evaluation period included Housing Agency loans, Home in the City loans, FHA loans, and Portfolio 97 loans. During the evaluation period, NBT did not make any loans among the various flexible lending products available in the Portland MSA AA.

INVESTMENT TEST

The institution’s performance under the Investment Test in Maine is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Portland MSA is good.

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)
Full-Scope										
Portland MSA AA	4	906	31	2,396	35	100.0	3,302	100.0	1	553
Total	4	906	31	2,396	35	100.0	3,302	100.0	1	553

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

** 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.

Portland MSA

The institution had an excellent level of qualified CD investment and grants, rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution rarely uses innovative and/or complex investments to support CD initiatives.

During the evaluation period, NBT made six investments totaling \$2.3 million and provided 25 qualifying grants and donations totaling \$109,000. The dollar volume of current- and prior-period investments (excluding unfunded commitments) represented 83.2 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs within the AA. Investments were particularly responsive to affordable housing needs creating 197 units of affordable housing. Additionally, the institution invested \$946,913 to two non-profit Community Development Financial Institutions (CDFIs). By dollar volume, 60.4 percent of current period investments and donations funded affordable housing, 37.1 percent funded economic development, and 2.5 percent funded community services to LMI individuals.

Examples of qualified investments in the AA include:

- Four investments totaling \$1.3 million in a low-income housing tax credits (LIHTC) fund (among three different phases) to finance the construction of 197 affordable housing units. The property, located in a low-income geography, restricted all units to residents that made 60 percent or less of the area median family income.
- A \$446,913 investment in a CDFI loan fund within the bank's AA. The fund allows participating companies to strengthen their workforce by providing strategic improvements to worker recruitment and retention in quality jobs for low- and moderate-income residents within the AA.

Because the bank was responsive to CD needs and opportunities in the full-scope area, broader statewide and regional investments that do not have a purpose, mandate, or function to serve the AA received consideration in the assessment. During the evaluation period, the institution made three LIHTC investments for a total of \$2.1 million, as well as three contributions totaling \$13,500. Two of the three contributions totaling \$10,000 were to community service organizations providing services to low- and moderate-income individuals and one contribution for \$3,500 was to an economic development organization that supports small businesses and small farms.

SERVICE TEST

The institution's performance under the Service Test in Maine is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland-South Portland MSA AA is adequate.

Retail Banking Services

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

Distribution of Branch Delivery System											2020-2021
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
Full-Scope											
Portland MSA	100.0	1	100.0	0.0	100.0	0.0	0.0	2.7	21.0	56.3	20.0
Total	100.0	1	100.0	0.0	100.0	0.0	0.0	2.7	21.0	56.3	20.0

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

Distribution of Branch Delivery System											2022
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
Full-Scope											
Portland MSA	100.0	1	100.0	0.0	0.0	100.0	100.0	0.4	19.8	53.7	26.1
Total	100.0	1	100.0	0.0	0.0	100.0	100.0	0.4	19.8	53.7	26.1

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

As of year-end 2022, the institution operated one branch in the Portland-South Portland MSA AA, located in a middle-income census tract. Prior to the 2020 U.S. Census tract changes, the branch was located in a moderate-income census tract. The assessment of performance considered the small percentage of the population residing in low-income tracts and the bank’s limited branch presence in this market.

NBT offered ADS including ATMs, self-service telephone banks, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. NBT had one deposit-taking ATM in the AA.

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

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

The bank did not open or close branches during the evaluation period.

Services, including location and business hours, were inconvenient to its AA, including low- and moderate-income geographies and/or individuals. The branch is located on the third floor of a shared building with an investment management company. Branch hours of operation were Monday through

Friday from 9:00 a.m. to 3:00 p.m. There are no drive-through facilities located on the premises. There is on-site walk-up access to a 24-hour ATM.

Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, NBT provided 22 qualified CD service activities to six organizations in the Portland MSA AA. Leadership was evident through board or committee participation with two bank employees providing 205.5 service hours over the evaluation period. In addition, one of those bank employees along with one other employee provided 24 hours of financial education to low- and moderate-income individuals. The bank's assistance was responsive to identified needs in the AA of affordable housing and community services to low- and moderate-income individuals.

Examples of CD services in the AA include:

- A bank officer sat on the board of an affordable housing organization providing 94 service hours over the evaluation period. The mission of the organization was to improve lives and strengthen communities by promoting and providing quality affordable homes for people in need, including assisted living communities for older adults.
- An employee served as treasurer for an organization that provides un-homed youth with a safe place to live, mental health services, including family mediation and counseling, and opportunities to develop life skills through transitional living programs, education and employment support programs, and prevention and training services.

STATE OF MASSACHUSETTS

CRA rating for the state of Massachusetts: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity and good geographic and borrower distribution of lending
- Leader in CD lending
- A significant level of CD investments
- Accessible retail service delivery systems
- A relatively high level of CD services

Description of Institution's Operations in the state of Massachusetts

NBT delineated one AA in the state of Massachusetts consisting of the Pittsfield MSA AA (Pittsfield MSA) in its entirety.

As of year-end 2022, NBT had five branch locations and five ATMs, all of which were deposit-taking. During the evaluation period, the bank originated and purchased \$66.4 million or 2.3 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Massachusetts represented NBT's fifth largest rated area in terms of deposits. Based on June 30, 2022, FDIC summary of deposit information, NBT had \$181.6 million in deposits, which represented 1.79 percent of the bank's adjusted total deposits. The bank ranked 105th in deposit market share with 0.03 percent out of 132 depository institutions. The top three competitors had 57.4 percent of the market share and included State Street Bank and Trust Company with one branch and 28.7 percent market share, Bank of America, N.A. with 166 branches and 19.4 percent market share, and Citizens Bank, N.A. with 206 branches and 9.3 percent market share.

Pittsfield MSA

The following tables provides a summary of the demographics, including housing and business information for the Pittsfield MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsfield MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	7.7	10.3	51.3	30.8	0.0
Population by Geography	129,288	8.4	11.4	50.5	29.7	0.0
Housing Units by Geography	68,385	9.0	10.7	50.5	29.8	0.0
Owner-Occupied Units by Geography	37,899	3.1	10.2	55.5	31.2	0.0
Occupied Rental Units by Geography	17,341	23.9	15.9	40.3	19.9	0.0
Vacant Units by Geography	13,145	6.1	5.5	49.8	38.6	0.0
Businesses by Geography	11,818	14.2	6.5	41.8	37.4	0.0
Farms by Geography	432	2.1	4.2	48.4	45.4	0.0
Family Distribution by Income Level	33,021	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	55,240	25.2	15.3	17.3	42.2	0.0
Median Family Income MSA - 38340 Pittsfield, MA MSA		\$66,604	Median Housing Value			\$227,590
			Median Gross Rent			\$771
			Families Below Poverty Level			9.7%

Source: 2015 ACS and 2021 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsfield MSA AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	2.5	20.0	55.0	22.5	0.0
Population by Geography	129,026	2.6	19.5	52.8	25.0	0.0
Housing Units by Geography	69,149	3.5	18.9	54.0	23.6	0.0
Owner-Occupied Units by Geography	38,359	0.3	15.4	56.5	27.8	0.0
Occupied Rental Units by Geography	16,427	11.6	30.6	45.5	12.3	0.0
Vacant Units by Geography	14,363	2.5	14.7	57.3	25.5	0.0
Businesses by Geography	14,148	17.5	13.0	46.0	23.4	0.0
Farms by Geography	479	4.0	5.4	62.4	28.2	0.0
Family Distribution by Income Level	31,780	19.7	17.8	22.1	40.4	0.0
Household Distribution by Income Level	54,786	25.4	15.1	17.6	41.9	0.0
Median Family Income MSA – Pittsfield MSA		\$82,207	Median Housing Value			\$242,969
			Median Gross Rent			\$899
			Families Below Poverty Level			5.9%

Source: 2020 U.S. Census and 2022 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

The Pittsfield MSA AA consisted of the sole county within the MSA, Berkshire County. As of year-end 2022, NBT operated five branches and five ATMs, all of which were deposit taking within the AA.

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT had \$181.6 billion in deposits in the AA, which comprised 1.79 percent of total bank adjusted deposits. NBT had 3.7 percent deposit market share, which ranked 7th among all institutions. Competition was extensive with 10 total FDIC insured financial institutions operating 50 offices in the AA. The top three competitors had 67.5 percent of the market share and included Berkshire Bank with 16 branches and 37.1 percent market share, Adams Community Bank with 8 branches and 16.6 percent market share, and TD Bank N.A. with four branches and 13.8 percent market share.

Based on information from the November 2022 Moody's Analytics report, the Pittsfield MSA economy has yet to fully recover from the COVID-19 pandemic, which was already in trouble, as the MSA's population has continued to trend downward due to economic pressures and the limited number of high-paying jobs not related to manufacturing. Berkshire County is known for its tourism industry; however, tourism to the area has declined due to lackluster income growth in the Northeast where the county draws most of its tourists. Job growth has been underwhelming as compared with the state and nation for much of the last year primarily due to a shrinking labor force. Job growth has shrunk across industries including healthcare, the public sector, and manufacturing. The top three private employment sectors in the MSA include education and health services, leisure and hospitality services, and retail trade with 25.7 percent, 12.8 percent, and 12.7 percent, respectively. The MSA's top employers included Berkshire Health Systems, General Dynamics Advanced Info Systems, and Berkshire Bank, along with state and local government jobs. The area had a sizeable elderly population with approximately 23 percent of the population over 65 years old. Housing affordability in the Pittsfield MSA compares favorably to the Northeast average; however, due to moderating house price appreciation, the demand for housing, including vacation homes, has slowed.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Pittsfield MSA was 4.5 percent, compared to 10.5 percent in 2020 and 6.8 percent in 2021. The elevated unemployment rate in 2020 was due to the impact on employment from the COVID-19 pandemic. Pittsfield MSA's unemployment rate was higher than the 3.8 percent unemployment rate for the state of Massachusetts, in 2022.

Based on FFIEC median family income ranges, low-income families earned less than \$43,650 and moderate-income families earned between \$43,650-\$69,840 within the MSA. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MSA or metropolitan division (MD), this calculated to a maximum monthly mortgage payment of \$1,091 for low-income borrowers and \$1,746 for moderate-income borrowers. Assuming a 30-year mortgage with a five 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 MSA median housing value would be \$2,400. Most low- and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

The OCC relied on information provided from a community contact to understand area needs and opportunities. The contact represented an affordable housing organization focused on affordable housing, whose primary purpose is to connect people with homes. The area has a relatively low median income and high housing costs. The contact stated that 59 percent of existing housing in Berkshire County are over 50 years old and require significant upgrades to comply with code standards. Several

communities have utilized Community Development Block Grants to rehabilitate old homes, but this hasn't improved the housing crisis in the area. The contact stated that there is a demand for affordable housing in the area but there has been little construction due to land conservation, residents' opposition to affordable housing due to the stigma surrounding low-income residents, and the inability of municipal employees to understand zoning laws. Opportunities noted by the contact included providing educational programs for wealth building and down payment assistance to support homeownership.

Scope of Evaluation in the state of Massachusetts

The OCC completed a full-scope review for the Pittsfield MSA AA as it is the only AA located in the state of Massachusetts.

In arriving at overall conclusions, the OCC placed more emphasis on the product category that had the higher percentage of lending in the AA. For the Pittsfield MSA, more emphasis was placed on home mortgage loans rather than small business loans. The OCC did not evaluate small loans to farms in the Pittsfield MSA AA as there were no loans in the AAs to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Pittsfield MSA AA is good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Pittsfield MSA	123	111	0	9	243	100.0	100.0
Total	123	111	0	9	243	100.0	100.0

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

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Pittsfield MSA	50,959	15,470	0	25,921	92,350	100.0	100.0
Total	50,959	15,470	0	25,921	92,350	100.0	100.0

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

Pittsfield MSA

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT ranked seventh out of 10 depository institutions (30th percentile) with a deposit market share of 3.7 percent.

Based on the 2022 HMDA market share data, NBT ranked 13th out of 209 lenders (94th percentile), with a market share of 1.2 percent for home mortgage loans. The top three lenders were Greylock Federal Credit Union with 35.3 percent market share, Adams Community Bank with 13.1 percent market share, and Academy Mortgage Corporation with 4.8 percent market share.

Based on the 2021 CRA small business loan data, NBT ranked 12th out of 89 lenders (87th percentile), with a market share of 1.8 percent for small loans to businesses. The top three lenders were American Express National Bank with 23.7 percent market share, JP Morgan Chase Bank, N.A. with 11.0 percent market share, and Citibank, N.A. with 8.1 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. The OCC generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Pittsfield MSA

Home Mortgage Loans

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

2020-2021

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

2022

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in both low- and moderate -income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

2020-2021

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies was below and in moderate-income geographies was well below the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was near-to, and in moderate-income geographies was significantly below, the aggregate percentage of all reporting lenders.

2022

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was well below, the percentage of businesses located in those geographies.

The OCC considered the bank's market share in these tracts compared to the bank's overall market share and competition from large banks, mortgage companies, and credit card companies. Aggregate data for all reporting lenders was not available.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Pittsfield MSA

Home Mortgage Loans

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

2020-2021

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers was near to, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was near to, the aggregate percentage of all reporting lenders.

2022

The distribution of home mortgage loans among individuals of different income levels was adequate. The percentage of home mortgage loans originated or purchased to low-income borrowers was

significantly below, and to moderate-income borrowers was near to, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low- income borrowers was significantly below, and to moderate-income borrowers was below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

2020-2021

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but was near-to the aggregate percentage of all reporting lenders.

The OCC considered the impact of small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 42.5 percent of small loans to business in the Pittsfield MSA, with 97.3 percent of these being PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA. Aggregate data for all reporting lenders was not available.

Community Development Lending

The institution is a leader in making 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.

Pittsfield MSA

The level of CD lending was excellent. NBT made nine CD loans totaling over \$25.9 million, which represented over 100 percent of allocated tier 1 capital. Included in this total were five PPP loans totaling \$12.5 million that supported area businesses during the COVID-19 pandemic.

By dollar volume, 45.7 percent funded revitalization and stabilization efforts, 34.7 percent of CD loans funded affordable housing, 13.3 percent funded economic development activities, and 7.3 percent funded community services.

Examples of CD loans in the AA include:

- A \$5.95 million loan to fund an affordable housing project of a 100-unit apartment building, of which 58 affordable units will be subject to rent caps of 30 percent of a family’s gross income. The city’s public housing agency will absorb the cost difference between what the tenant pays and the gross market rent through a Section 8 Housing Choice Voucher.
- A \$7.1 million SBA PPP loan to a health service provider located in a low-income geography to assist with job retention of 338 employees during the COVID-19 pandemic.

Product Innovation and Flexibility

Pittsfield MSA

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, NBT made five loans among the various flexible lending products available in the Pittsfield MSA.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Pittsfield MSA is good.

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)
Full-Scope										
Pittsfield MSA	2	1,170	42	1,869	44	100.0	3,039	100.0	0	0
Total	2	1,170	42	1,869	44	100.0	3,039	100.0	0	0

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

** 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.

Pittsfield MSA

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

During the evaluation period, NBT made three investments totaling \$1.81 million and provided 39 qualifying grants and donations totaling \$61,500. The dollar volume of current- and prior-period investments (excluding unfunded commitments) represented 15 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs while grants were mostly for community services. By dollar volume, 70.0 percent of current period investments and donations funded affordable housing, and 26.8 percent funded economic development.

The institution did not use innovative and/or complex investments to support CD initiatives.

Examples of qualified investments in the AA include:

- A \$1.3 million investment for the purpose of a Housing Homeownership Program in Berkshire County.
- A \$500,000 investment in a CDFI, certified by the CDFI Fund, that plays an important role in generating economic growth in distressed communities.

Because the bank was responsive to CD needs and opportunities in the full-scope areas, broader statewide and regional investments that do not have a purpose, mandate, or function to serve the AA received consideration in the assessment. During the evaluation period, NBT made one grant worth \$2,200 for economic development purposes.

SERVICE TEST

The institution's performance under the Service Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsfield MSA AA good.

Retail Banking Services

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

Distribution of Branch Delivery System											2020-2021	
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	
Full-Scope												
Pittsfield MSA	100	5	100.0	20.0	20.0	40.0	20.0	8.4	11.4	50.5	29.7	
Total	100	5	100.0	20.0	20.0	40.0	20.0	8.4	11.4	50.5	29.7	

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

Distribution of Branch Delivery System											2022
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
Full-Scope											
Pittsfield MSA	100	5	100.0	20.0	0.0	40.0	40.0	2.6	19.5	52.8	25.0
Total	100	5	100.0	20.0	0.0	40.0	40.0	2.6	19.5	52.8	25.0

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

At the end of 2021, the bank's distribution of branches in low- and moderate-income geographies exceeded the percentage of the population living within those geographies. In 2022, the bank's distribution of branches in low- income geographies exceeded the percentage of the population living within those geographies. The bank's distribution of branches in moderate- income geographies was significantly below the percentage of the population living within those geographies. The bank's geographic distribution of branches was negatively impacted by the 2020 census, which changed one of the bank's branches from a moderate-income census tract to a middle-income census tract. The OCC further considered two MUI branches that served moderate areas within the AA, which improved access and had a positive impact on the retail service test conclusion.

NBT offered ADS including ATMs, self-service telephone banking, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. NBT had five ATMs in the AA, all of which were deposit-taking. The distribution of ATMs in low-income geographies was good and in moderate-income geographies was poor.

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

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

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. NBT maintained standard business hours at all branch location in the AA. The bank offered extended hours on Fridays, and four of the five branches were open on Saturdays. The branch in the low-income census tract did not have Saturday hours, as this branch is located downtown and does not see much, if any, traffic on the weekends. Of the five branches in the AA, four had drive-through facilities, including one in low- and moderate-income geographies. NBT offered traditional banking products and services at all branch locations in the AA except for safe deposit boxes and night deposit services, which were not available at all branches due to physical space requirements.

Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, NBT provided seven qualified CD service activities to five organizations in the Pittsfield MSA AA. Leadership was evident through committee participation with one bank employee providing 64 hours over the evaluation period. Two employees provided 41 hours of financial education to low- and moderate- income individuals. In addition, one employee provided eight hours to an organization promoting economic development.

Examples of CD services in the AA include:

- Two senior level bank employees volunteered at a non-profit organization that provides services to domestic abuse victims. The employees provided 41 service hours of financial coaching to victims of domestic abuse who were receiving aid through the organization.
- A senior level bank employee served as a committee member for an organization that provided school programs to develop financial management skills and provided financial counseling to participants in a workforce development program. The organization primarily served LMI individuals, and the employee provided 64 hours of counseling.

STATE OF NEW HAMPSHIRE

CRA rating for the state of New Hampshire: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity and geographic distribution of lending and adequate borrower distribution of lending
- Leader in CD lending
- Good level of CD investments
- Accessible retail service delivery systems
- Relatively high level of CD services

Description of Institution's Operations in the state of New Hampshire

NBT delineated two AAs in the state of New Hampshire. They included the New Hampshire portion of the Boston-Worcester-Providence, MA-RI-NH-CT CSA (Providence CSA) and one nonmetropolitan county comprising the New Hampshire Non MSA (NH Non MSA).

As of year-end 2022, NBT had four branch locations and seven ATMs, of which four were deposit-taking, within these AAs. During the evaluation period, the bank originated and purchased \$285 million or 9.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of New Hampshire represented NBT's third largest rated area in terms of deposits. Based on June 30, 2022, FDIC summary of deposit information, NBT had \$211.4 million in deposits, which represented 2.1 percent of the bank's adjusted total deposits. The bank ranked 32nd in deposit market share with 0.41 percent out of 42 depository institutions. The top three competitors had 57.6 percent of the market share and included TD Bank, N.A. with 52 branches and 23.9 percent market share, Citizens Bank, N.A. with 53 branches and 20.1 percent market share, and Bank of America, N.A. with 19 branches and 13.7 percent market share.

Providence CSA

The following tables provides a summary of the demographics, including housing and business information for the Providence CSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Providence CSA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	213	4.2	20.7	47.4	26.3	1.4
Population by Geography	975,513	3.8	19.0	48.6	28.6	0.0
Housing Units by Geography	411,091	4.2	21.3	48.4	26.1	0.0
Owner-Occupied Units by Geography	265,364	1.3	15.1	51.3	32.3	0.0
Occupied Rental Units by Geography	111,793	10.5	34.4	41.8	13.3	0.0
Vacant Units by Geography	33,934	6.1	26.6	47.7	19.7	0.0
Businesses by Geography	101,038	3.8	18.3	47.9	29.7	0.3
Farms by Geography	3,096	1.3	11.9	54.7	32.0	0.1
Family Distribution by Income Level	255,277	19.2	17.5	22.5	40.8	0.0
Household Distribution by Income Level	377,157	22.8	16.2	18.6	42.4	0.0
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$85,966	Median Housing Value			\$251,319
Median Family Income MSA - 40484 Rockingham County-Strafford County, NH		\$90,150	Median Gross Rent			\$1,057
Median Family Income Non-MSAs - NH		\$71,699	Families Below Poverty Level			5.3%
<i>Source: 2015 ACS and 2020 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Providence CSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	122	6.6	20.5	42.6	29.5	0.8
Population by Geography	551,234	5.6	17.5	42.4	34.5	0.0
Housing Units by Geography	230,860	6.1	19.5	43.1	31.3	0.0
Owner-Occupied Units by Geography	144,377	1.6	12.9	44.7	40.9	0.0
Occupied Rental Units by Geography	67,536	15.0	33.1	38.2	13.7	0.0
Vacant Units by Geography	18,947	9.0	21.1	48.8	21.1	0.0
Businesses by Geography	60,282	5.8	18.7	39.3	35.9	0.3
Farms by Geography	1,904	2.0	10.2	49.0	38.7	0.1
Family Distribution by Income Level	141,974	19.3	16.9	22.1	41.7	0.0
Household Distribution by Income Level	211,913	22.8	15.8	18.1	43.3	0.0
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$85,966	Median Housing Value			\$235,257
Median Family Income Non-MSAs - NH		\$71,699	Median Gross Rent			\$1,040
			Families Below Poverty Level			5.9%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Providence CSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	142	6.3	16.9	46.5	29.6	0.7
Population by Geography	576,745	5.2	16.6	44.6	33.6	0.0
Housing Units by Geography	237,485	5.6	18.0	45.4	31.0	0.0
Owner-Occupied Units by Geography	149,990	1.3	11.0	48.4	39.3	0.0
Occupied Rental Units by Geography	72,062	14.3	32.3	38.9	14.5	0.0
Vacant Units by Geography	15,433	6.2	18.2	47.4	28.1	0.0
Businesses by Geography	62,191	6.1	15.3	43.0	35.4	0.3
Farms by Geography	1,962	1.9	8.0	48.6	41.5	0.1
Family Distribution by Income Level	145,175	18.3	18.3	22.9	40.5	0.0
Household Distribution by Income Level	222,052	22.7	15.6	18.3	43.3	0.0
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$103,238	Median Housing Value			\$268,320
Median Family Income Non-MSAs - NH		\$85,473	Median Gross Rent			\$1,185
			Families Below Poverty Level			4.6%
<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>						

In 2020, the Providence CSA AA consisted of the Manchester-Nashua, NH MSA and the Rockingham County-Strafford County, NH MD. In 2021 and 2022, the Providence CSA AA consisted of the Manchester-Nashua, NH MSA and Merrimack County. As of year-end 2022, NBT operated three branches and six ATMs, three of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT had \$149.4 million in deposits in the AA, which comprised 1.5 percent of total bank adjusted deposits. NBT had a 0.62 percent deposit market share, which ranked 15th among all institutions. Competition was extensive with 25 total FDIC insured financial institutions operating 143 offices in the AA. The top three competitors had 73.0 percent of the market share and included Citizens Bank, N.A. with 24 branches and 27.2 percent market share, TD Bank, N.A. with 24 branches and 26.3 percent market share, and Bank of America, N.A. with nine branches and 19.4 percent market share.

Based on information from the May 2023 Moody's Analytics report the Manchester-Nashua, NH economy stagnated in relation to the Northeast. The area ended 2022 with strong manufacturing payrolls and declining unemployment; however, this was driven by a shrinking labor force. Additionally, single-family housing permitting fell to its lowest since 2015. Key drivers of the economy are manufacturing, service, finance, and insurance industries. Major employers include DeMoulas & Market Basket, Walmart, Inc., BAE Systems Electronic Solutions, Fidelity Investments, and Hannaford. Strengths within the MSA include a highly educated workforce with above-average incomes, no state sales, income, or capital gains tax, proximity to the Boston metropolitan area, a high quality of life, and friendly business climate that appeals to entrepreneurs. Weaknesses include slow population growth relative to the rest of the country and high energy and housing costs relative to the nation.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Providence CSA was 2.4 percent, compared to 6.7 percent in 2020 and 3.3 percent in 2021. Unemployment rates increased significantly in 2020 as a result of the COVID-19 pandemic hitting a high of 16 percent in April of 2020. The CSA unemployment rate was comparable to the 2.5 percent unemployment rate for the state of New Hampshire, in 2022.

Based on FFIEC median family income ranges, low-income families earned less than \$47,250 or \$57,250 and moderate-income families earned between \$47,250-\$75,600 or between \$57,250-\$91,600. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MSA or MD, this calculated to a maximum monthly mortgage payment between \$1,181-\$1,431 for low-income borrowers and between \$1,890-\$2,290 for moderate-income borrowers. Assuming a 30-year mortgage with a five 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 CSA median housing value would be between \$1,440-\$2,679. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA. The housing value in the AA increased from \$372,400 in 2020 to \$499,000 in 2022, reflecting a percent change of 34.0 percent according to Realtor.com data.

The OCC relied on information provided from two community contacts to understand area needs and opportunities. The contacts represented organizations focused on economic development and affordable housing. One contact indicated that historically it has been difficult to develop housing in the area due to red tape to get required permits, and affordable housing is stagnant due to the cost of credit. The other contact indicated that New Hampshire has one of the best economic development/small business financing markets they have seen, and many community banks are involved with the organization to finance large and small projects. Opportunities noted by the contacts included investments in LIHTCs, as that is how most affordable housing in the area is financed and working with area economic development organizations to help finance projects for small businesses.

Scope of Evaluation in the state of New Hampshire

The OCC selected one AA for full-scope review. A full-scope review of the Providence CSA was completed as it is the largest AA in the state of New Hampshire in terms of deposits, branches, and lending activity. The NH Non MSA AA received a limited-scope review. Refer to the table in appendix A for more information.

In arriving at overall conclusions, the OCC placed more emphasis on the product category that had the higher percentage of lending in the AA. For the Providence CSA AA, the OCC placed more emphasis on small loans to businesses. The OCC did not evaluate small loans to farms in the Providence CSA AA or the NH MSA AA as there weren't enough loans in the AAs to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Providence CSA AA is good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Businesses	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Providence CSA	229	292	1	9	531	77.9	70.7
Limited-Scope							
NH Non MSA	46	104	0	1	151	22.1	29.3
Total	275	396	1	10	682	100.0	100.0

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

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Businesses	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Providence CSA	188,637	52,023	9	32,929	273,589	85.7	70.7
Limited-Scope							
NH Non MSA	20,804	23,720	0	1,114	45,638	14.3	29.3
Total	209,441	75,743	9	34,043	319,227	100.0	100.0

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

Providence CSA

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT ranked 15th out of 25 depository institutions (40th percentile) with a deposit market share of 0.62 percent.

Based on the 2022 HMDA market share data, NBT ranked 103rd out of 452 lenders (77th percentile) with a market share of 0.16 percent for home mortgage loans. The top three lenders were Community Bank, N.A. with 9.4 percent market share, Rocket Mortgage with 4.7 percent market share, and United Wholesale Mortgage with 4.3 percent market share.

Based on the 2021 CRA small business loan data, NBT ranked 29th out of 162 lenders (82nd percentile) with a market share of 0.43 percent for small loans to businesses. The top three lenders were American

Express National Bank with 19.4 percent market share, JP Morgan Chase Bank, N.A. with 9.0 percent market share, and Bank of America, N.A. with 8.8 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. The OCC generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Providence CSA

Home Mortgage Loans

Refer to Table O in the state of New Hampshire 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.

2020

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

2021

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

2022

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of New Hampshire 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.

2020

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near to, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near to, the aggregate percentage of all reporting lenders.

2021

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

2022

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Providence CSA

Home Mortgage Loans

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

2020

The distribution of home mortgage loans among individuals of different income levels was adequate. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers was well below, the percentage of those families in the AA. The percentage of home

mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers was significantly below, the aggregate percentage of all reporting lenders.

2021

The distribution of home mortgage loans among individuals of different income levels was adequate. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers was below, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers was below, the aggregate percentage of all reporting lenders.

2022

The distribution of home mortgage loans among individuals of different income levels was adequate. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers was well below, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was significantly below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

2020

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

The OCC considered significant competition and the bank's limited market share for small loans to businesses. Collectively, the top ten lenders in the AA account for 73.6 percent of the market share and represent significant competition from credit card companies. The OCC considered the impact of small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 41.3 percent of small loans to businesses in the Providence CSA. Loans with unknown revenues (47.0 percent) were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2021

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

The OCC considered significant competition and the bank's limited market share for small loans to businesses. Collectively, the top 10 lenders in the AA account for 73.6 percent of the market share and significant competition from credit card companies. The OCC considered the impact of small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 40.0 percent of small loans to businesses in the Providence CSA. The majority of the loans with unknown revenues (58.3 percent) were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to businesses of different sizes was poor. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA.

The OCC considered significant competition and the bank's limited market share for small loans to businesses. Collectively, the top 10 lenders in the AA account for 73.6 percent of the market share and significant competition from credit card companies.

Community Development Lending

The institution was a leader in making 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.

Providence CSA

The level of CD lending was excellent. NBT made nine CD loans totaling \$32.9 million, which represented over 100 percent of allocated tier 1 capital. Included in this total were seven PPP loans totaling \$12.9 million that supported area businesses during the COVID-19 pandemic. CD loans were impactful as they were responsive to identified community needs including affordable housing.

By dollar volume, 60.7 percent of CD loans funded affordable housing, 21.2 percent funded revitalization and stabilization efforts, and 18.1 percent funded economic development.

Examples of CD loans in the AA include:

- Two loans totaling \$20 million to construct an apartment complex that includes over 50 percent affordable units in an area with high demand for affordable housing. The property consisted of 288 apartment units, 144 of which were specified for low- and moderate-income individuals. NBT served as the lead bank on this loan, which is a participation with another area financial institution.

Product Innovation and Flexibility

Providence CSA

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, NBT made six loans among the various flexible lending products available in the Providence AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the NH Non MSA is consistent with the bank's overall performance in the full-scope area.

Refer to Tables O through T in the state of New Hampshire section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in New Hampshire is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Providence CSA is good.

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)
Full-Scope										
Providence CSA	5	2,118	29	14,564	34	73.9	16,682	98.3	0	0
Limited-Scope										
NH Non MSA	1	228	11	60	12	26.1	288	1.7	0	0
Total	6	2,346	40	14,624	46	100.0	16,970	100.0	0	0

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

** 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.

Providence CSA

The institution had an excellent level of qualified CD investment and grants, rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution rarely uses innovative and/or complex investments to support CD initiatives.

During the evaluation period NBT made seven investments totaling \$14.5 million and provided 22 qualifying grants and donations totaling \$59,140. The dollar volume of current- and prior-period investments represented 100 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to needs within the AA. Investments were particularly responsive to affordable housing needs. By dollar volume, 99.7 percent of current period investments and donations funded affordable housing, with the remaining investments and donations funded community services to LMI individuals.

Examples of qualified investments in the AA include:

- A \$13.0 million investment in an MBS, which provided funding for 849 affordable housing units.
- A \$574,929 investment in a LIHTC fund that provided 66 affordable renting units with the AA.

Broader Statewide

Because the bank was responsive to CD needs and opportunities in the full-scope area, broader statewide and regional investments that do not have a purpose, mandate, or function to serve the AA received consideration in the assessment. During the evaluation period, NBT made three LIHTC investments totaling \$640,432 in the broader statewide region, which represented 2.7 percent of allocated tier 1 capital for the state of New Hampshire. This investment has a neutral impact on performance.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the NH Non MSA is weaker than overall performance in the full-scope area. Performance in the NH Non MSA is weaker than the overall performance in the full-scope area due to a lower level of CD investments. Weaker performance did not impact the Investment Test rating in the state of New Hampshire.

SERVICE TEST

The institution's performance under the Service Test in New Hampshire is rated High Satisfactory

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Providence CSA AA good.

Retail Banking Services

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

Distribution of Branch Delivery System											2020-2021	
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	
Full-Scope												
Providence CSA	66.7	4	80.0	25.0	25.0	25.0	25.0	5.6	17.5	42.4	34.5	
Limited-Scope												
NH Non MSA	33.3	1	20.0	0.0	0.0	100.0	0.0	0.0	10.8	76.5	12.7	
Total	100.0	5	100.0	20.0	20.0	40.0	20.0	4.9	16.7	46.6	31.8	

Distribution of Branch Delivery System											2022	
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	
Full-Scope												
Providence CSA	70.7	3	75.0	33.3	0.0	66.7	0.0	5.2	16.6	44.6	33.6	
Limited-Scope												
NH Non MSA	29.3	1	25.0	0.0	0.0	100	0.0	0.0	15.3	84.7	0.0	
Total	100.0	4	100.0	25.0	0.0	75.0	0.0	4.6	16.4	49.3	29.7	

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

At the end of 2021, the bank's distribution of branches in low- and moderate-income geographies exceeded the percentage of the populations living within those geographies. In 2022, the bank's distribution of branches in low-income geographies exceeded the percentage of the population living within those geographies. The bank's distribution of branches in moderate-income geographies was below the percentage of the population living with those geographies. This change is due to the income level of the of the census tract where one of the bank's branches was located changed from moderate- to middle-income due to the 2020 census. The OCC further considered one MUI branches that served low- or moderate-income areas within the AA, which improved access and had a positive impact on the retail service test conclusion.

NBT offered ADS including ATMs, self-service telephone banking, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. NBT had six ATMs in the AA, of which three were deposit-taking. The distribution of ATMs in low- and moderate-income geographies was excellent. The OCC considered the impact that 2020 census changes had on the distribution of branches and ATMs. From 2020-2021, NBT had one branch and one ATM located in a moderate-income census tract. In 2022, due to the 2020 census changes the moderate-income census tract shifted to become a middle-income census tract.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope						
Providence CSA	1	1	0	0	1	-1
Limited-Scope						
NH Non MSA	0	0	0	0	0	0
Total	1	1	0	0	1	-1

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

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch during the evaluation period and the bank closed one branch during the evaluation period. The branch closure was the result of low market activity.

Services, including where appropriate, and business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. NBT maintained standard business hours at all branch locations in the AA. One branch in the AA was open on Saturdays and had drive-through facilities, this included the one branch in a moderate-income geography. NBT offered traditional banking products and services at all branch locations in the AA.

Community Development Services

The institution provided a relatively high level of CD services. During the evaluation period, NBT provided nine qualified CD service activities to four organizations in the Providence CSA AA. Leadership was evident through board or committee participation with two bank employees providing 64 service hours over the evaluation period. In addition, one employee provided 23 hours of technical expertise to small businesses.

Examples of CD services in the AA include:

- One employee sat on the board and was President of the local chapter of a nationwide non-profit community service organization providing over 50 service hours over the evaluation period. The mission of the organization was to enrich and improve the lives of Manchester's children and youth, especially those whose opportunities are limited by poverty.
- One employee consulted, taught workshops, and provided technical assistance to small businesses through a regional economic development organization providing 29 service hours over the evaluation period. The mission of the organization is to be an inclusive economic empowerment organization, helping women business owners and aspiring women entrepreneurs launch and grow their business by providing greater access to resources, tools, and support.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the NH Non MSA AA is weaker than the bank's overall performance in the full-scope area. The bank's performance in the NH Non MSA AA is weaker than the overall performance in the full-scope areas due to lower branch

distributions. Weaker performance did not impact the Investment Test rating the state of New Hampshire.

STATE OF NEW YORK

CRA rating for the state of New York: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity and good geographic and borrower distribution of lending
- Leader in CD lending
- Excellent level of CD investments
- Accessible retail service delivery systems
- Relatively high level of CD services

Description of Institution's Operations in the state of New York

NBT delineated five AAs in the state of New York. They included the Albany-Schenectady-Troy, NY CSA (Albany CSA), Syracuse, NY MSA (Syracuse MSA), Utica-Rome, NY MSA (Utica MSA), Binghamton, NY MSA (Binghamton MSA), and NY Non-MSA (NY Non-MSA).

As of year-end 2022, NBT had 100 branch locations and 135 ATMs, of which 107 were deposit-taking. During the evaluation period, the bank originated or purchased \$1.8 billion or 62.4 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of New York represented NBT's largest rated area in terms of deposits. Based on June 30, 2022, FDIC Summary of Deposit information, NBT had \$8.1 billion in deposits, which represented 79.4 percent of the bank's adjusted total deposits. The bank ranked 29th in deposit market share with 0.3 percent out of 192 depository institutions. The top four competitors had 55.8 percent of the market share and included J.P. Morgan Chase Bank, N.A. with 587 branches and 32.1 percent market share, Goldman Sachs Bank USA with one branch and 9.9 percent market share, Morgan Stanley Private Bank N.A. with one branch and 6.9 percent of the market share, and The Bank of New York Mellon with two branches and 6.9 percent of the market share.

Albany CSA

The following tables provides a summary of the demographics, including housing and business information for the Albany CSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albany CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	285	8.4	18.6	53.0	18.6	1.4
Population by Geography	1,110,111	6.4	17.1	54.6	21.0	0.9
Housing Units by Geography	515,871	7.2	18.1	55.5	19.0	0.1
Owner-Occupied Units by Geography	290,136	2.6	13.5	59.5	24.4	0.0
Occupied Rental Units by Geography	148,697	13.9	25.2	46.9	13.8	0.2
Vacant Units by Geography	77,038	11.7	21.7	57.3	8.9	0.4
Businesses by Geography	98,425	11.4	12.9	51.0	24.4	0.3
Farms by Geography	3,416	1.7	10.7	67.4	20.2	0.1
Family Distribution by Income Level	268,912	20.8	17.7	22.3	39.3	0.0
Household Distribution by Income Level	438,833	24.4	15.7	18.8	41.1	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$81,103	Median Housing Value			\$184,514
Median Family Income MSA - 24020 Glens Falls, NY MSA		\$64,495	Median Gross Rent			\$886
Median Family Income Non-MSAs - NY		\$59,570	Families Below Poverty Level			8.2%
<i>Source: 2015 ACS Census 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albany CSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	328	7.6	18.3	49.4	22.0	2.7
Population by Geography	1,129,157	7.3	16.6	49.5	25.0	1.7
Housing Units by Geography	532,465	7.6	18.5	49.8	23.1	1.1
Owner-Occupied Units by Geography	295,425	3.0	13.6	53.2	29.9	0.3
Occupied Rental Units by Geography	159,424	14.8	23.9	43.5	15.4	2.5
Vacant Units by Geography	77,616	10.5	25.5	49.5	13.1	1.4
Businesses by Geography	102,504	6.4	12.3	48.3	25.4	7.7
Farms by Geography	3,490	1.3	13.0	60.6	24.0	1.1
Family Distribution by Income Level	273,803	21.4	17.8	21.4	39.4	0.0
Household Distribution by Income Level	454,849	24.2	16.4	17.9	41.5	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$95,438	Median Housing Value			\$201,584
Median Family Income MSA - 24020 Glens Falls, NY MSA		\$77,435	Median Gross Rent			\$1,006
Median Family Income Non-MSAs - NY		\$69,021	Families Below Poverty Level			6.7%
<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>						

The Albany CSA consisted of the Albany-Schenectady-Troy NY MSA, the Glens Falls NY MSA, and two counties not in a MSA. This includes Albany, Rensselaer, Saratoga, Schenectady, Schoharie, Fulton, Montgomery, Warren, and Washington counties. As of year-end 2022, NBT operated 26 branches and 32 ATMs, 27 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT had \$2.5 billion in deposits in the AA which comprised 24.5 percent of total bank adjusted deposits. NBT had 6.0 percent deposit market share, which ranked fifth among all institutions. Competition was extensive with 24 total FDIC insured financial institutions operating 342 offices in the AA. The top four competitors had 58.3 percent of the market share and included Key Bank, N.A. with 43 branches and 23.6 percent market share, Citizens Bank N.A. with 22 branches and 16.7 percent market share, Bank of America N.A. with 16 branches and 9.0 percent of the market share, and Trustco Bank with 62 branches and 9.0 percent of the market share.

Based on information from the May 2023 Moody Analytics report, the CSA's economy was in recovery from a period of recession due to growth in semi-conductor manufacturing and the resurgence of higher education post COVID-19. GlobalFoundries, one of the area's largest employers, went through aggressive expansion plans, and has partnered with defense contractor Lockheed Martin to support semi-conductor manufacturing growth in the U.S. In addition, the reopening of the local universities to in-person instruction post COVID-19 has increased enrollment and, as a result, employment in the higher-education industry. Despite this growth, declining population trends have reduced the tax base and increased the tax burden for the area. Other weaknesses include declining home values and declining state government employment opportunities due to the declining tax base. Key sectors of the economy consisted of government, restaurants, and colleges.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Albany MSA was 3.0 percent, compared to 6.9 percent in 2020 and 4.4 percent in 2021. The large increase in 2020 is the result of the COVID-19 pandemic and associated economic impacts. The Albany MSA unemployment rate was favorable to the 4.3 percent unemployment rate for the state of New York in 2022. The Albany CSA also included the Glens Falls MSA. According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Glens Falls MSA was 3.3 percent, compared to 7.6 percent in 2020 and 4.8 percent in 2021. The large increase in 2020 is the result of the COVID-19 pandemic and associated economic impacts. The Glens Falls MSA unemployment rate was favorable to the 4.3 percent unemployment rate for the state of New York in 2022.

Based on FFIEC median family income ranges, low-income families earned less than \$38,350 or \$53,000 and moderate-income families earned less than \$61,360 or 84,800, depending on the MSA or MD. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MSA or MD, this calculated to a maximum monthly mortgage payment between \$959 and \$1,325 for low-income borrowers and between \$1,534 and \$2,120 for moderate-income borrowers. Assuming a 30-year mortgage with a five 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 CSA median housing value would be \$1,132 to \$1,852. Most low-income borrowers would be unable to afford a mortgage loan in this AA, while most moderate-income borrowers would be able to afford a mortgage loan. The median housing value in the Albany-Schenectady-Troy MSA increased from \$299,900 in 2020 to \$345,000 in 2022, reflecting a percent change of 15.0 percent according to Realtor.com data. The median housing value in the Glens Falls MSA increased from \$249,000 in 2020

to \$299,900 in 2022, reflecting a percent change of 20.4 percent according to Realtor.com data. The median home price in Fulton and Montgomery counties in 2022 was \$210,846, according to Realtor.com data.

The OCC relied on information provided from three community contacts to understand area needs and opportunities. The contacts represented organizations focused on economic development, affordable housing, and community services for low- and moderate-income individuals. The OCC also considered comments provided by five community organizations as part of a CRA listening session. Community contacts indicated a need for affordable housing given the increase in evictions, foreclosures, and rent hikes in the area post-COVID-19. In addition, small businesses have struggled to receive affordable funding and capital despite the improving economic conditions in the Capital Area. Rehabilitation of aging housing stock and affordable home repair loans needed to address problems with dilapidated and vacant housing. The adequacy and availability of early childhood education in low- and moderate-income communities have also deteriorated significantly as a result of the pandemic.

NY Non-MSA

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY Non MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	148	0.7	6.8	72.3	15.5	4.7
Population by Geography	543,852	0.5	7.7	72.9	15.9	3.0
Housing Units by Geography	284,261	0.5	6.9	77.5	15.0	0.1
Owner-Occupied Units by Geography	148,878	0.1	6.1	78.1	15.7	0.0
Occupied Rental Units by Geography	58,369	1.8	13.4	68.4	16.2	0.1
Vacant Units by Geography	77,014	0.3	3.6	83.2	12.8	0.1
Businesses by Geography	34,309	1.0	8.8	70.0	19.7	0.4
Farms by Geography	2,230	0.1	4.2	81.6	14.1	0.0
Family Distribution by Income Level	131,202	20.9	17.2	21.7	40.2	0.0
Household Distribution by Income Level	207,247	24.7	15.9	17.9	41.5	0.0
Median Family Income Non-MSAs - NY		\$59,570	Median Housing Value			\$128,005
			Median Gross Rent			\$721
			Families Below Poverty Level			11.0%

*Source: 2015 ACS and 2021 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY Non-MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	176	0.6	15.3	64.8	15.9	3.4
Population by Geography	523,183	0.3	15.4	64.6	17.6	2.1
Housing Units by Geography	290,534	0.3	15.2	68.9	15.6	0.0
Owner-Occupied Units by Geography	151,469	0.3	13.7	69.9	16.0	0.0
Occupied Rental Units by Geography	57,684	0.7	23.6	58.7	16.9	0.0
Vacant Units by Geography	81,381	0.1	11.8	74.1	14.0	0.0
Businesses by Geography	35,493	0.7	15.3	63.5	20.2	0.3
Farms by Geography	2,275	0.2	12.0	75.6	12.2	0.0
Family Distribution by Income Level	129,197	21.1	17.3	20.8	40.8	0.0
Household Distribution by Income Level	209,153	24.3	15.7	18.0	42.0	0.0
Median Family Income Non-MSAs - NY		\$69,021	Median Housing Value			\$141,332
			Median Gross Rent			\$762
			Families Below Poverty Level			9.8%
<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>						

The NY Non-MSA consisted of ten counties not located in a MSA and includes: Chenango, Clinton, Cortland, Delaware, Essex, Franklin, Greene, Hamilton, Otsego, and St. Lawrence counties. As of year-end 2022, NBT operated 40 branches and 56 ATMs, 42 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT had \$2.9 billion in deposits in the AA, which comprised 28.4 percent of total bank adjusted deposits. NBT had 22.6 percent deposit market share, which ranked first among all institutions. Competition was extensive with 24 total FDIC insured financial institutions operating 165 offices in the AA. Combined with the bank, the other top four competitors had 64.4 percent of the market share and included Community Bank N.A. with 40 branches and 20.4 percent market share, The Bank of Greene County with seven branches and 12.1 percent market share, and KeyBank N.A. with 15 branches and 9.3 percent of the market share.

The NY Non-MSA AA includes Clinton, Essex, Franklin, Hamilton, and St. Lawrence counties in NY's Adirondack Region. The Adirondack Region included the Adirondack Park which spans six million acres consisting of state- and privately-owned lands, which have tight controls on land usage. Key economic drivers of the Adirondack Region of the AA included forestry, agriculture, hospitality, healthcare, and education.

The NY Non-MSA AA also includes Chenango, Cortland, and Otsego counties in NY's Central Region, and Delaware and Greene counties in NY's Hudson Valley Region. The counties in these regions are primarily rural with small towns throughout, and a few, more heavily populated areas spread throughout each county. These few heavier populated areas include Norwich in Chenango County, Cortland in Cortland County, and Oneonta in Otsego County. Delaware and Greene Counties include the Catskill Park, which spans 700,000 acres and, similar to the Adirondack Park, consist of state- and privately-owned lands which have tight controls on land usage. Delaware County, in particular, was sparsely populated as approximately 50 percent of the county's land area was part of the New York City

Watershed that supplies unfiltered water supply to New York City and several surrounding counties. There are numerous regulatory restrictions limiting development in the watershed area in order to protect water quality. Key economic drivers included forestry, agriculture, hospitality, recreation, healthcare, and education.

According to the U.S. Bureau of Labor Statistics, the average 2022 annual unemployment rate in the NY Non-MSA was 3.7 percent, compared to 7.5 percent in 2020 and 4.8 percent in 2021. The large increase in 2020 is the result of the COVID-19 pandemic and associated economic impacts. The NY Non-MSA unemployment rate was favorable to the 4.3 percent unemployment rate for the state of New York in 2022. The range of unemployment rates for 2022 included a high of 4.3 percent in Hamilton County and a low of 3.3 percent in Chenango and Clinton counties.

Based on FFIEC median family income ranges, low-income families earned less than \$38,350 and moderate-income families earned between \$38,350-\$61,360. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$959 for low-income borrowers and \$1,534 for moderate-income borrowers. Assuming a 30-year mortgage with a five 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 non-MSA median housing value would be \$759. Most low- and moderate-income borrowers would be able to afford a mortgage loan in this AA. The median home price in the AA in 2022 was \$141,332, according to Realtor.com data.

The OCC relied on information provided from four community contacts to understand area needs and opportunities. The contacts represented organizations focused on economic development, affordable housing, and community services for low- and moderate-income individuals. Community contacts indicated a need for affordable housing and improvements to local housing stock due to the rise in homelessness, vacant "zombie" properties, increase in secondary-home or investment housing, and antiquated homes in serious need of repairs. In addition, the growth of new small businesses or enterprises has been stagnant, as banks in the area are hesitant to lend to businesses that are not large or already established. The availability of public transportation and affordable childcare are also major issues for the more rural low- and moderate-income populations.

Scope of Evaluation in the state of New York

The OCC selected two AAs for full-scope reviews. A full-scope review was completed for the NY Non-MSA as it is the largest AA in the state of New York in terms of deposits, branches, and lending activity. The OCC also selected the Albany CSA to receive a full-scope review as the bank ranked second in the AA in terms of deposits, making the bank important to this AA. The Syracuse MSA, Utica-Rome MSA, and Binghamton MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

In arriving at overall conclusions, the OCC placed more emphasis on the product category that had the higher percentage of lending in the AA. For the Albany CSA and NY Non-MSA AAs, the OCC placed more emphasis on small loans to businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN New York

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Albany CSA and NY Non-MSA AAs is good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Albany CSA	1,171	2,165	193	25	3,555	26.3	30.8
NY Non-MSA	1,938	2,131	197	34	4,299	31.8	35.8
Limited-Scope							
Binghamton MSA	338	649	29	18	1,034	7.6	7.8
Syracuse MSA	1,190	1,585	85	38	2,898	21.4	15.9
Utica MSA	776	846	86	25	1,733	12.8	9.7
Total	5,413	7,376	590	140	13,519	100.0	100.0

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

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Albany CSA	297,435	238,589	15,014	66,471	617,509	28.2	30.8
NY Non-MSA	294,574	194,829	12,688	81,043	583,134	26.6	35.8
Limited-Scope							
Binghamton MSA	42,950	67,019	1,786	36,903	148,658	6.8	7.8
Syracuse MSA	210,047	203,788	4,307	104,009	522,151	23.8	15.9
Utica MSA	135,733	102,550	8,484	73,247	320,015	14.6	9.7
Total	980,738	806,775	42,279	361,673	2,191,468	100.0	100.0

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

Albany CSA

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT ranked fifth out of 24 depository institutions (79th percentile) with a deposit market share of 6.0 percent.

Based on the 2022 HMDA market share data, NBT ranked 23rd out of 332 lenders (93rd percentile) with a market share of 1.1 percent for home mortgage loans. The top three lenders were Broadview F.C.U. with 10.1 percent market share, Homestead Funding Corp. with 7.9 percent market share, and SEFCU Services L.L.C. with 6.7 percent market share.

Based on the 2021 CRA small business loan data, NBT ranked eighth out of 152 lenders (95th percentile) with a market share of 3.6 percent for small loans to businesses. The top three lenders were American Express N.A. with 20.5 percent market share, JP Morgan Chase Bank N.A. with 9.8 percent market share, and Bank of America N.A. with 7.9 percent market share.

Based on the 2021 CRA small farm loan data, NBT ranked first out of 20 lenders (95th percentile) with a market share of 22.4 percent for small loans to farms. The other lenders within the top three were JP Morgan Chase Bank N.A. with 15.5 percent market share, and Wells Fargo Bank N.A. with 10.7 percent market share.

NY Non MSA

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT ranked first out of 24 depository institutions (96th percentile) with a deposit market share of 22.6 percent.

Based on the 2022 HMDA market share data, NBT ranked third out of 302 lenders (99th percentile) with a market share of 6.0 percent for home mortgage loans. The top two lenders were Community Bank N.A. with 12.1 percent market share, and Rocket Mortgage with 8.0 percent market share.

Based on the 2021 CRA small business loan data, NBT ranked second out of 110 lenders (98th percentile) with a market share of 10.1 percent for small loans to businesses. The other lenders within the top three were American Express National Bank with 16.8 percent market share, and Synchrony Bank with 8.8 percent market share.

Based on the 2021 CRA small farm loan data, NBT ranked first out of 21 lenders (95th percentile) with a market share of 25.1 percent for small loans to farms. The other lenders within the top three were John Deere Financial FSB with 13.8 percent market share, and Wells Fargo Bank N.A. with 13.5 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in its AA. The OCC generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Albany CSA

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.

2020-2021

The geographic distribution of home mortgage loans was good. The OCC considered the impact of heavy competition among home mortgage lenders, higher foreclosure rates, and significant increases in home values in these areas. The percentage of home mortgage loans originated or purchased in low-income geographies was well below, and in moderate-income geographies exceeded, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was well below, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

The bank faced significant competition for home mortgages among low-income geographies in the AA. Based on the December 31, 2021, HMDA market share report in the Albany CSA, the bank ranked 37th out of 102 lenders (63rd percentile). The top five lenders of Homestead Funding Corp., SEFCU Services LLC, Sunmark Credit Union, Rocket Mortgage, and Wells Fargo Bank N.A. represented 31.1 percent of the market share of the total number of loans in the AA.

2022

The geographic distribution of home mortgage loans was adequate. The OCC considered the impact of heavy competition among home mortgage lenders, higher foreclosure rates, and significant increases in home values in these areas. The percentage of home mortgage loans originated or purchased in low-income geographies was well below, and in moderate-income geographies exceeded, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

The bank faced significant competition for home mortgages among low-income geographies in the AA. Based on the December 31, 2022, HMDA market share report in the Albany CSA, the bank ranked 44th out of 108 lenders (41st percentile). The top five lenders of Sunmark Credit Union, United Wholesale Mortgage, SEFCU Services LLC, Homestead Funding Corp., and Broadview Federal Credit Union represented 35.4 percent of the market share of the total number of loans in the AA.

Small Loans to Businesses

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

2020-2021

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies. The

percentage of small loans to businesses originated or purchased in low-income geographies was well below, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

2022

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies significantly below, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies. The percentage of small loans to businesses could not be compared to aggregate lending performance as 2022 small business peer data was not available.

Small Loans to Farms

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

2020-2021

The geographic distribution of small loans to farms was excellent. The percentage of small loans to farms originated or purchased in low-income geographies was below, and in moderate-income geographies exceeded, the percentage of farms located in those geographies. The percentage of small loans to farms originated or purchased in low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

2022

The geographic distribution of small loans to farms was adequate. The percentage of small loans to farms originated or purchased in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of farms located in those geographies. The percentage of small loans to farms could not be compared to aggregate lending performance as 2022 small farm peer data was not available.

Lending Gap Analysis

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

NY Non MSA

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.

2020-2021

The geographic distribution of home mortgage loans was adequate. The OCC considered the impact of heavy competition among home mortgage lenders, higher foreclosure rates, and significant increases in

home values in these areas. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

The moderate-income geographic distribution performance was weighted more heavily than the low-income distribution performance given the limited number of low-income geographies within the AA and associated low number of owner-occupied housing units. The AA had only one low-income census tract, which represented only 149 owner-occupied housing units that were in that census tract. This is compared to the moderate-income geographies totaling 10 in the AA and representing 9,082 owner-occupied housing units in the AA.

2022

The geographic distribution of home mortgage loans was adequate. The OCC considered the impact of heavy competition among home mortgage lenders, higher foreclosure rates, and significant increases in home values in these areas. The percentage of home mortgage loans originated or purchased in low-income geographies significantly below, and in moderate-income geographies was below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was near to, the aggregate percentage of all reporting lenders.

The moderate-income geographic distribution performance was weighted more heavily than the low-income distribution performance given the limited number of low-income geographies within the AA and associated low number of owner-occupied housing units. The AA had only one low-income census tract, which represented only 454 owner-occupied housing units that were in that census tract. This is compared to the moderate-income geographies totaling 27 in the AA and representing 9,082 owner-occupied housing units in the AA.

Small Loans to Businesses

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

2020-2021

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was well below, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

The moderate-income geographic distribution performance was weighted more heavily than the low-income distribution performance given the limited number of low-income geographies within the AA and associated low number of businesses. The AA had only one low-income census tract, which represented only 343 businesses that were in that census tract. This is compared to the moderate-income geographies totaling 10 in the AA and representing 3,019 owner-occupied housing units in the AA.

2022

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was below, the percentage of businesses located in those geographies. The percentage of small loans to businesses could not be compared to aggregate lending performance as 2022 small business peer data was not available.

The moderate-income geographic distribution performance was weighted more heavily than the low-income distribution performance given the limited number of low-income geographies within the AA and associated low number of businesses. The AA had only one low-income census tract, which represented only 248 businesses that were in that census tract. This is compared to the moderate-income geographies totaling 27 in the AA and representing 5,430 owner-occupied housing units in the AA.

Small Loans to Farms

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

2020-2021

The geographic distribution of small loans to farms was very poor. The percentage of small loans to farms originated or purchased in low- and moderate-income geographies was significantly below the percentage of farms located in those geographies. The percentage of small loans to farms originated or purchased in low- and moderate-income geographies was significantly below the aggregate percentage of all reporting lenders.

2022

The geographic distribution of small loans to farms was very poor. The percentage of small loans to farms originated or purchased in low- and moderate-income geographies was significantly below the percentage of farms located in those geographies. The percentage of small loans to farms could not be compared to aggregate lending performance as 2022 small farm peer data was not available.

Lending Gap Analysis

The OCC analyzed NBT's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. No unexplained conspicuous lending gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Albany CSA

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 institution's home mortgage loan originations and purchases.

2020-2021

The distribution of home mortgage loans among individuals of different income levels was good. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers approximated, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers was approximated, and to moderate-income borrowers was near to, the aggregate percentage of all reporting lenders.

2022

The distribution of home mortgage loans among individuals of different income levels was good. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers equaled, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers was approximate to, and to moderate-income borrowers was below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

2020-2021

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

The bank faced significant competition for small business loans in the AA. Based on the market share of small loans to businesses with revenues of less than \$1 million in the AA as of December 31, 2021, the bank placed 12th among 152 lenders (92nd percentile) with 2.17 percent of the market share. The top five lenders of JP Morgan Chase Bank N.A., Bank of America N.A., American Express National Bank, Synchrony Bank, and Capital One Bank (USA) N.A. engaged primarily in business credit card lending as the average loan size for each of them was less than \$20,000, and they held 54.3 percent of the market share. The OCC also considered the impact of the bank's small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 45 percent of small loans to businesses in the Albany CSA. The majority of the loans with unknown revenues (95 percent) were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to businesses of different sizes was poor. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA. The percentage of small loans to businesses could not be compared to aggregate lending performance as 2022 small business peer data was not available.

Small Loans to Farms

Refer to Table T in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

2020-2021

The distribution of loans to farms of different sizes was adequate considering that small farm lending was not a primary focus for the bank. The percentage of loans to small farms originated or purchased was well below percentage of farms in the AA but was near to the aggregate percentage of all reporting lenders.

The bank faced substantial competition for small farm loans in the AA and the bank represented a leader in lending to small farms. Based on the market share of small loans to farms with revenues of less than \$1 million in the AA as of December 31, 2021, the bank placed first among 20 lenders (5th percentile) with 20.1 percent of the market share. The other top five lenders of JP Morgan Chase Bank N.A., U.S. Bank N.A., Key Bank N.A., and Bank of America N.A. held a combined 52.9 percent of the market share. The OCC also considered the impact of the bank's small loans to farms with unavailable revenue data. Borrower revenue information was not available for 25 percent of small loans to farms in the Albany CSA. The majority of the loans with unknown revenues (97 percent) were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to farms of different sizes was poor considering that small farm lending was not a primary focus for the bank. The percentage of loans to small farms originated or purchased was well below the percentage of farms in the AA. The percentage of small loans to farms could not be compared to aggregate lending performance as 2022 small farm peer data was not available.

NY Non MSA

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 institution's home mortgage loan originations and purchases.

2020-2021

The distribution of home mortgage loans among individuals of different income levels was good. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers

exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low- income borrowers equaled, and to moderate-income borrowers exceeded, the aggregate percentage of all reporting lenders.

2022

The distribution of home mortgage loans among individuals of different income levels was good. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

2020-2021

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

The bank faced significant competition for small business loans in the AA. Based on the market share of small loans to businesses with revenues of less than \$1 million in the AA as of December 31, 2021, the bank placed seventh among 110 lenders (6th percentile) with 5.5 percent of the market share. The top five lenders of Synchrony Bank, American Express National Bank, JP Morgan Chase Bank N.A., U.S. Bank N.A., and Capital One Bank (USA) N.A. engaged primarily in business credit card lending as the average loan size for each of them was less than \$20,000, and they held 56.6 percent of the market share. The OCC also considered the impact of the bank's small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 54 percent of small loans to businesses in the Albany CSA. The majority of the loans with unknown revenues (96 percent) were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA. The percentage of small loans to businesses could not be compared to aggregate lending performance as 2022 small business peer data was not available.

Small Loans to Farms

Refer to Table T in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

2020-2021

The distribution of loans to farms of different sizes was good considering that small farm lending was not a primary focus for the bank. The percentage of loans to small farms originated or purchased was well below the percentage of farms in the AA but exceeded the aggregate percentage of all reporting lenders.

The bank faced substantial competition for small farm loans in the AA and the bank represented a leader in lending to small farms. Based on the market share of small loans to farms with revenues of less than \$1 million in the AA as of December 31, 2021, the bank placed first among 21 lenders (5th percentile) with 24.7 percent of the market share. The other top five lenders of U.S. Bank N.A., JP Morgan Chase Bank N.A., Community Bank N.A., and Capital One Bank (U.S.A.) N.A. held a combined 51.4 percent of the market share. The OCC also considered the impact of the bank's small loans to farms with unavailable revenue data. Borrower revenue information was not available for 44 percent of small loans to farms in the Albany CSA. All of the loans with unknown revenues were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to farms of different sizes was excellent considering that small farm lending was not a primary focus for the bank. The percentage of loans to small farms originated or purchased exceeded the percentage of small farms in the AA. The percentage of small loans to farms could not be compared to aggregate lending performance as 2022 small farm peer data was not available.

Community Development Lending

The institution was a leader in making 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.

Albany CSA

The level of CD lending was excellent. NBT made 25 CD loans totaling over \$66.5 million, which represented 24.7 percent of allocated tier 1 capital. Included in this total were 17 PPP loans totaling \$28.9 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing, economic development, and community services.

By dollar volume, 38.9 percent funded revitalization and stabilization efforts, 24.6 percent funded economic development activities, 21.4 percent of CD loans funded affordable housing, and 15.0 percent funded community services.

Examples of CD loans in the AA include:

- A \$12.9 million loan to finance construction of an innovative project to provide affordable housing. The project consisted of the construction of various structures to provide 51 affordable housing residential units in various LMI CTs in the AA. Sources of funding for this project included the sale of a LIHTC and construction financing from the bank.
- A \$7.4 million portion of a \$67.5 million line of credit participation facility with various other financial institutions to provide an operating line of credit for NYSARC Inc., an agency that provides mental health services to LMI individuals in the AA.
- Two loans totaling \$6.1 million to finance the reconstruction and revitalization of a historic building in the Warehouse District of Albany into a 273-unit apartment building with 47,269 sq. ft. of commercial space.

NY Non MSA

The level of CD lending was excellent. NBT made 34 CD loans totaling over \$81.0 million, which represented 24.5 percent of allocated tier 1 capital. Included in this total were 24 PPP loans totaling \$47.3 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing, economic development, and community services.

By dollar volume, 33.7 percent funded community services, 31.1 percent funded revitalization and stabilization efforts, 24.5 percent funded economic development activities, and 10.7 percent of CD loans funded affordable housing.

Examples of CD loans in the AA include:

- A \$8 million loan to finance the reconstruction of a hospital in Norwich, NY that provides affordable healthcare services to LMI in the area. The construction helped to update the emergency department and create a new ambulatory center for less urgent care needs for the rural community. Sources of funding for this project included the bank's financing and grant funding from NY state.
- A 7.4 million loan to construct a mixed-use property in a rural area with high demand for affordable housing. The property consisted of 40 affordable housing units and five commercial units. NBT contributed the sole bank financing for the project, which was roughly 47 percent of total construction costs, with the remaining funding contributed by tax equity and grant funding.
- Two loans totaling \$6.5 million to finance the expansion of broadband internet infrastructure to rural LMI census tracts. Funding consists of the bank's financing and grant funding from NY state.

Product Innovation and Flexibility

Albany CSA

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, NBT made 50 loans among the various flexible lending products available in the Albany CSA.

NY Non MSA

The institution made use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, NBT made 83 loans among the various flexible lending products available in the NY Non MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Binghamton MSA, Syracuse MSA, and Utica MSA AAs is consistent with the bank's overall performance in the full-scope areas.

Refer to Tables O through T in the state of New York section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Albany CSA and NY Non-MSA is good.

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)
Full-Scope										
Albany CSA	3	74	116	38,414	119	21.1	38,488	29.8	1	245
NY Non-MSA	7	658	179	43,382	186	33.0	44,040	34.1	1	257
Limited-Scope										
Binghamton MSA	1	70	62	15,341	63	11.2	15,411	11.9	0	0
Syracuse MSA	2	248	134	17,436	136	24.1	17,684	13.7	0	0
Utica MSA	1	465	59	12,929	60	10.6	13,394	10.4	1	498
Total	14	1,515	550	127,502	564	100.0	129,017	100.0	3	1,000

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

** 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.

Albany CSA

The institution had an excellent level of qualified CD investment and grants, rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

During the evaluation period NBT made 21 investments totaling \$38.4 million and provided 95 qualifying grants and donations totaling \$315,898. The dollar volume of current- and prior-period investments (excluding unfunded commitments) represented 13.9 percent of tier 1 capital allocated to the AA.

The institution exhibited adequate responsiveness to credit and community economic development needs. Investments were particularly responsive to community services by funding improvement projects for multiple school districts benefitting LMI families, and to affordable housing needs by creating 70 units of affordable housing in the AA. By dollar volume, 90.9 percent funded community services to LMI individuals, 6.6 percent of current period investments and donations funded affordable housing, 2.3 percent funded economic development, and 0.1 percent funded revitalization and stabilization efforts.

The institution rarely used innovative and/or complex investments to support CD initiatives. CD investments included mostly government investment bonds and structured securities.

Examples of qualified investments in the AA include:

- A \$5 million municipal bond to improve facilities for a school district in which the majority of students are economically disadvantaged.
- A \$856,090 SBA loan fund that improved small business development in the AA and provided 5 jobs in Washington County.

NY Non-MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period NBT made 37 investments totaling \$43.4 million and provided 142 qualifying grants and donations totaling \$620,023. The dollar volume of current- and prior-period investments (excluding unfunded commitments) represented 13.7 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs. Investments were particularly responsive to community services by funding improvement projects for multiple school districts benefitting LMI families and to affordable housing needs creating 40 units of affordable housing. By dollar volume, 87.7 percent funded community services to LMI individuals, 9.9 percent of current period investments and donations funded affordable housing, 2.1 percent funded economic development, and 0.3 percent funded revitalization and stabilization efforts.

The institution rarely used innovative and/or complex investments to support CD initiatives. CD investments included mostly government investment bonds and structured securities.

Examples of qualified investments in the AA include:

- A \$4.3 million investment in a LIHTC fund, along with a \$9.7 million CD loan, to construct a mixed-use property including 40 affordable housing units and five commercial spaces. The property is located in a rural area with a significant need for affordable housing.
- A \$4 million municipal bond to improve facilities for a school district in which the majority of students are economically disadvantaged.
- A \$899,195 SBA loan fund that improved small business development in the AA and provided 35 jobs in Greene County.

Because the bank was responsive to CD needs and opportunities in the full-scope areas, broader statewide and regional investments that do not have a purpose, mandate, or function to serve the AA received consideration in the assessment. During the evaluation period, NBT made three donations totaling \$4,500 in the broader statewide region. This investment has a neutral impact on performance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Binghamton MSA, Syracuse MSA, and Utica MSA AAs is consistent with the bank's overall performance in the full-scope areas.

SERVICE TEST

The institution's performance under the Service Test in New York is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Albany CSA and NY Non MSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System								2020-2021			
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
Full-Scope											
Albany CSA	28.8	26	16.0	7.7	19.2	65.4	7.7	6.4	17.1	54.6	21.0
NY Non MSA	39.6	40	50.0	0.0	2.5	80.0	17.5	0.5	7.7	72.9	15.9
Limited-Scope											
Binghamton MSA	7.8	8	8.0	25.0	12.5	62.5	0.0	6.4	12.7	55.0	25.8
Syracuse MSA	14.8	19	19.0	0.0	21.1	52.6	26.3	9.3	16.7	45.4	27.2
Utica MSA	9.0	7	7.0	28.6	0.0	42.9	28.6	11.7	10.2	53.0	23.3
Total	100.0	100	100.0	6.0	11.0	67.0	16.0	6.5	14.1	55.8	22.1

Distribution of Branch Delivery System								2022			
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
Full-Scope											
Albany CSA	30.8	26	26.0	0.0	30.8	46.2	15.4	7.7	15.5	49.5	25.6
NY Non MSA	35.8	40	40.0	0.0	5.0	67.5	27.5	0.3	15.4	64.6	17.6
Limited-Scope											
Binghamton MSA	7.8	8	8.0	12.5	37.5	25.0	25.0	3.9	18.3	44.5	32.2
Syracuse MSA	15.9	19	19.0	5.3	26.3	36.8	26.3	7.4	18.1	42.9	28.3
Utica MSA	9.7	7	7.0	0.0	28.6	28.6	28.6	7.6	17.3	48.2	21.3
Total	100.0	100	100.0	2.0	20.0	50.0	24.0	5.9	16.5	50.2	24.9

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

Albany CSA

At the end of 2021, the bank's distribution in low-income and moderate-income geographies exceeded the percentage of the populations living within those geographies. In 2022, the bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. The change in low-income geographies is due to changes made from the 2020 census. The institution operated 26 branches in the AA, of which none were located in low-income census tracts and eight were located in moderate-income census tracts. The OCC further considered seven MUI branches that served low- or moderate-income areas within the AA, which improved access and had a positive impact on the retail service test conclusion. Consideration was given to branches that were one mile or less from a low- or moderate-income geography, as that would allow the institution to serve these geographies for those with limited modes of transportation.

NBT offered ADS including ATMs, self-service telephone banking, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. NBT had 32 ATMs in the AA, of which 27 were deposit-taking. The distribution of ATMs in low-income geographies was very poor and in moderate-income geographies was poor.

NY Non-MSA

At the end of 2021, the bank’s distribution in low-income geographies was below and moderate-income geographies well below the percentage of the populations living within those geographies. In 2022, the bank’s distribution of branches in low-income geographies was below, and in moderate-income geographies was well below, the percentage of the population living within those geographies. The institution operated 40 branches in the AA, of which none were located in low-income census tracts and two were located in moderate-income census tracts. Out of the 176 census tracts in the AA, there was only one low-income census tract, which examiners considered in their analysis. The OCC considered changes made to geographies due to the 2020 census. In addition, consideration was given to 14 MUI branches that served low- or moderate areas within the AA, which improved access and had a positive impact on the retail service test conclusion. Consideration was given to branches that were one mile or less from a low- or moderate-income geography, as that would allow the institution to serve these geographies for those with limited modes of transportation.

NBT offered ADS including ATMs, self-service telephone banking, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. NBT had 56 ATMs in the AA, of which 42 were deposit-taking. The distribution of ATMs in low-income geographies was adequate and in moderate-income geographies was poor. The OCC considered the fact that there was only one low-income census tract in the AA out of 176 in regard to ATM distribution among census tracts.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Albany CSA	0	1	0	0	0	-1
NY Non-MSA	0	1	0	0	-1	0
Limited-Scope:						
Binghamton MSA	0	0	0	0	0	0
Syracuse MSA	1	1	-1	0	1	0
Utica MSA	0	2	0	0	-2	0
Total	1	5	-1	0	-2	-1

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

Albany CSA

The institution’s opening and closing of branches has not affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- or moderate-income individuals. The bank did not open any branches during the evaluation period. The bank closed one

branch, which was not located in a low- or moderate-income geography. Branch closures were the result of low market activity, affecting the institution's profitability and growth.

Services, including where appropriate, and business hours did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. NBT maintained standard business hours at all branch locations in the AA. Twenty-two branches were open on Saturdays including eight moderate-income branches. All 22 branches that were open on Saturdays included lobby and drive-through services. An additional two drive-throughs were open for transactions on Saturdays, which were not located in a low- or moderate-income geography.

NY Non-MSA

The institution's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- or moderate-income individuals. The bank did not open any branches during the evaluation period. The bank closed one branch, which was not located in a low- or moderate-income geography. Branch closures were the result of low market activity, affecting the institution's profitability and growth.

Services, including where appropriate, and business hours did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. NBT maintained standard business hours at all branch locations in the AA. Fifteen branches were open on Saturdays including one moderate-income branch. All 15 branches that were open on Saturdays included lobby and drive-through services. An additional 7 drive-throughs were open for transactions on Saturdays, of which none were located in low- or moderate-income geographies.

Community Development Services

Albany CSA

The institution provided a relatively high level of CD services. During the evaluation period, NBT provided 99 qualified CD service activities to 39 organizations in the Albany CSA AA for a total of 1,655.5 service hours. Of these hours, 51 hours were credited to four affordable housing activities, 888.5 hours were credited to 58 community services activities, and 716 hours were credited to 37 economic development activities. Leadership was evident through board or committee participation with 25 bank employees providing 1,258 service hours over the evaluation period, including 339 services provided by ten employees to community services organizations and economic development organizations. The bank's assistance was responsive to identified needs in the AA including providing service hours to community service organizations that have missions of addressing the lack of childcare in the AA and providing youth programs to impoverished communities.

Examples of CD services in the AA include:

- A senior level bank employee served as board president to an organization that provides training and technical assistance to small businesses owned by minorities, women, and persons of low income, providing 262 hours over the evaluation period.
- A senior level bank employee served as treasurer of a non-profit organization whose mission is to improve the neighborhoods it serves as a setting for family life, contributing to health and

well-being, and promoting education and employment as a means of self-development, providing 168 hours over the evaluation period.

- Multiple employees volunteered to provide tax preparation assistance to multiple organizations, including 90 hours to assist low-income elders in the AA preparing federal and state income tax forms.

NY Non-MSA

The institution provided a relatively high level of CD services. During the evaluation period, NBT provided 212 qualified CD service activities to 60 organizations in the NY Non-MSA for a total of 3,155.75 service hours. Of these hours, 302.5 hours were credited to eight affordable housing activities, 2,290.25 hours were credited to 47 community services activities, 443 hours were credited to 13 economic development activities, and 120 hours were credited to one revitalization/stabilization activity. Leadership was evident through board or committee participation with 25 bank employees providing 1,632 service hours over the evaluation period, including 189 services provided by four employees to community services organizations and economic development organizations. Thirty-three employees contributed 693.25 hours to community service organizations that focused on addressing food insecurity and lack of basic necessities such as personal hygiene products. In addition, 10 employees provided 108 hours of financial literacy education to low- and moderate-income individuals in school districts where a majority of students were economically disadvantaged and or to individuals with developmental disabilities.

Examples of CD services in the AA include:

- An executive level bank officer sat on the board of the local chapter of a nationwide non-profit community service organization providing 110 service hours over the evaluation period. The mission of the organization was to create long-lasting changes by helping children and youth achieve their potential through education, improving accessibility to quality, affordable healthcare, and promoting financial stability and self-sufficiency in meeting basic needs.
- A bank employee provided 120 service hours as a member of a city's planning and application committees, dedicated to a Downtown Revitalization Initiative (DRI), as created and defined by New York State to help redevelop downtown districts across the state.
- A senior level bank officer sat on the board of a workforce development organization, providing 100 service hours over the evaluation period. The objective of the organization was to ensure economic vitality by building and maintaining a quality workforce development system through economic, educational, and development opportunities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Binghamton MSA and Syracuse MSA is stronger than the bank's overall performance in the full-scope areas due to better branch distributions. The bank's performance in the Utica MSA is consistent with the bank's overall performance in the full-scope areas.

STATE OF PENNSYLVANIA

CRA rating for the state of Pennsylvania: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity, overall adequate geographic distribution of lending and overall good borrower distribution of lending
- Leader in CD lending which had a positive impact on the rating
- Excellent level of CD investments
- Accessible retail service delivery systems
- Leader in providing CD services

Description of Institution's Operations in the state of Pennsylvania

NBT delineated three AAs in the state of Pennsylvania. They included the Scranton-Wilkes-Barre MSA (Scranton MSA), the Pennsylvania portion of the New York-Newark, NY-NJ-CT-PA CSA (New York CSA), and two counties comprising the Pennsylvania Non-MSA (PA Non MSA).

As of year-end 2022, NBT had 25 branch locations and 32 ATMs, of which 29 were deposit-taking, within these AAs. During the evaluation period, the bank originated and purchased \$287.5 million or 9.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Pennsylvania represented NBT's second largest rated area in terms of deposits. Based on June 30, 2022, FDIC summary of deposit information, NBT had \$1.4 billion in deposits, which represented 14.2 percent of the bank's adjusted total deposits. The bank ranked 46th in deposit market share with 0.25 percent out of 171 depository institutions. The top three competitors had 38.1 percent of the market share and included PNC Bank, N.A. with 296 branches and 24.7 percent market share, Wells Fargo Bank, N.A. with 205 branches and 7.2 percent market share, and Citizens Bank, N.A. with 287 branches and 6.2 percent market share.

Scranton MSA

The following tables provides a summary of the demographics, including housing and business information for the Scranton MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Scranton MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	3.5	24.7	51.2	19.4	1.2
Population by Geography	561,701	3.2	20.5	52.2	23.6	0.5
Housing Units by Geography	258,782	3.1	20.3	54.5	21.8	0.4
Owner-Occupied Units by Geography	152,184	1.6	14.2	56.5	27.5	0.0
Occupied Rental Units by Geography	72,436	6.0	31.3	48.8	12.9	1.0
Vacant Units by Geography	34,162	3.0	24.1	57.4	14.9	0.6
Businesses by Geography	51,264	2.8	19.4	51.2	24.6	2.1
Farms by Geography	1,182	1.8	10.4	54.1	33.5	0.3
Family Distribution by Income Level	141,530	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	224,620	25.1	15.9	16.9	42.2	0.0
Median Family Income MSA - 42540 Scranton--Wilkes-Barre, PA MSA		\$59,887	Median Housing Value			\$130,472
			Median Gross Rent			\$710
			Families Below Poverty Level			11.1%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Scranton MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	168	3.0	28.0	47.6	20.8	0.6
Population by Geography	567,559	3.0	26.1	45.6	24.8	0.5
Housing Units by Geography	264,290	2.8	25.6	48.0	23.0	0.5
Owner-Occupied Units by Geography	153,036	1.3	18.1	52.0	28.5	0.1
Occupied Rental Units by Geography	75,627	5.8	38.7	39.6	15.0	0.8
Vacant Units by Geography	35,627	2.9	30.5	48.7	16.6	1.3
Businesses by Geography	59,280	4.8	24.2	43.1	27.6	0.3
Farms by Geography	1,297	1.5	13.5	56.8	28.1	0.0
Family Distribution by Income Level	141,619	21.6	17.3	20.5	40.6	0.0
Household Distribution by Income Level	228,663	24.8	16.0	17.1	42.2	0.0
Median Family Income MSA - 42540 Scranton--Wilkes-Barre, PA MSA		\$70,003	Median Housing Value			\$137,358
			Median Gross Rent			\$792
			Families Below Poverty Level			10.3%
<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>						

The Scranton MSA AA consisted of all three counties that comprise the MSA including: Lackawanna County, Luzerne County, and Wyoming County. As of year-end 2022, NBT operated 12 branches and 16 ATMs, 14 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT had \$740.5 million in deposits in the AA, which comprised 7.3 percent of total bank adjusted deposits. NBT had 4.4 percent deposit market share which ranked eighth among all institutions. Competition was normal with 21 total FDIC insured financial institutions operating 181 offices in the AA. The top four competitors had 52.4 percent of the market share and included PNC Bank, N.A. with 19 branches and 25.1 percent market share and The Fidelity Deposit and Discount Bank with 17 branches and 10.1 percent market share, Peoples Security Bank and Trust Company with 13 branches and 8.7 percent market share, and Manufacturers and Trader Trust Company with 12 branches and 8.6 percent market share.

Based on information from the May 2023 Moody's Analytics report, the pandemic disrupted a decades-long pattern of out-migration in the Scranton MSA. The area experienced net in-migration in 2021 and 2022 with gains concentrated in the prime-working age cohort. The MSA is close to several major metro areas and has below average living costs, making it attractive to remote workers. Overall job growth has been on par with state and national averages for several quarters, pushing total employment to a new high. Major industries include healthcare, professional/business, and transportation/warehousing. The three largest employers are Gelsinger Health System, Community Health System, and Proctor & Gamble. The MSA has a higher percentage of its population over the age of 50 as compared to the national average, and the healthcare industry has grown to meet the demand for medical services. The proximity to several large east coast markets also makes the area a key logistics hub. The concentration of transportation/warehousing employment is in the top 10 nationally and the industry has powered strong job growth for more than a decade. While overall employment has improved, the MSA has a concentration of jobs in low-paying industries, which contributes to a below-average per capita income. New housing supply remains scarce, which has pushed prices higher; however, housing and rental affordability scores are favorable to state and national averages.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Scranton MSA was 5.1 percent, compared to 10.1 percent in 2020 and 7.2 percent in 2021. The unemployment rate has trended lower as the economic impact of the pandemic wanes. The MSA unemployment rate was higher than the 4.4 percent unemployment rate for the state of Pennsylvania in 2022.

Based on FFIEC median family income ranges, low-income families earned less than \$37,050 and moderate-income families earned between \$37,050-\$59,280. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$926 for low-income borrowers and \$1,482 for moderate-income borrowers. Assuming a 30-year mortgage with a five 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 MSA median housing value would be \$1,154. Most low-income borrowers would be unable to afford a mortgage loan in this AA, while most moderate-income borrowers would be able to afford a mortgage loan.

The OCC relied on information provided from one community contact conducted during the evaluation period to understand area needs and opportunities. The contact represented an organization focused on addressing community needs by supporting area nonprofits. The organization serves northeastern Pennsylvania, but its activities are concentrated in Luzerne County. The contact noted a need for affordable housing financing and start-up financing for local businesses. The contact also indicated there

is opportunity to support the local accelerator program, which has been successful in assisting aspiring entrepreneurs.

Scope of Evaluation in the state of Pennsylvania

The OCC selected one AA for a full-scope review. A full-scope review was completed for the Scranton MSA as it is the largest AA in the state of Pennsylvania in terms of deposits, branches, and lending activity. The New York CSA and PA Non MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

In arriving at overall conclusions, the OCC placed more emphasis on the product category that had the higher percentage of lending in the AA. For the Scranton MSA, the OCC placed more emphasis on home mortgage loans. The OCC did not evaluate small loans to farms as there weren’t enough loans in the AAs to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Scranton MSA AA is good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Scranton MSA	706	618	6	9	1,339	54.9	51.5
Limited-Scope							
New York CSA	277	265	2	1	545	22.3	17.2
PA Non-MSA	314	233	10	0	557	22.8	31.3
Total	1,297	1,116	18	10	2,441	100.0	100.0

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

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Scranton MSA	101,478	67,404	214	20,927	190,023	60.6	51.5
Limited-Scope							
New York CSA	46,779	15,858	17	5,000	67,654	21.6	17.2
PA Non-MSA	41,992	13,453	324	0	55,769	17.8	31.3
Total	190,249	96,715	555	25,927	313,446	100.0	100.0

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

Scranton MSA

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT ranked 8th out of 21 depository institutions (62nd percentile) with a deposit market share of 4.4 percent.

Based on the 2022 HMDA market share data, NBT ranked 20th out of 386 lenders (95th percentile) with a market share of 1.65 percent for home mortgage loans. The top three lenders were Rocket Mortgage with 5.8 percent market share, The Fidelity Deposit and Discount with 5.0 percent market share, and Community Bank, N.A. with 4.3 percent market share.

Based on the 2021 CRA small business loan data, NBT ranked 16th out of 118 lenders (86th percentile) with a market share of 2.1 percent for small loans to businesses. The top three lenders were American Express National Bank with 16.2 percent market share, Fidelity Deposit and Discount with 8.3 percent market share, and Peoples Security Bank and Trust with 6.6 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA. The OCC generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Scranton MSA

Home Mortgage Loans

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

2020-2021

The geographic distribution of home mortgage loans was adequate. The OCC considered the impact of heavy competition among home mortgage lenders and limited housing stock in low-income geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was well below the aggregate percentage of all reporting lenders.

There were six low-income census tracts with 7,893 units, of which 31.4 percent were owner occupied and 13.1 percent were vacant. In 2020, 67 lenders originated or purchased a total of 221 loans in low-income geographies. The top five lenders were responsible for 63 loans and had a 28.5 percent market share. NBT originated or purchased two loans for a 0.9 percent market share. Twenty-seven lenders originated or purchased one loan each. In 2021, 89 lenders originated or purchased 292 loans in low-income geographies. The top five lenders were responsible for 89 loans and had a 30.4 percent market share. NBT did not originate or purchase any loans. 54 lenders originated or purchased one loan each.

There were 42 moderate-income census tracts with 52,571 units, of which 41.2 percent were owner occupied and 15.7 percent were vacant. In 2020, 162 lenders originated or purchased a total of 1,959 loans in moderate-income geographies. The top five lenders were responsible for 519 loans and had a 26.5 percent market share. NBT originated 14 loans for a 0.7 percent market share. Sixty-one lenders originated or purchased one loan each. In 2021, 205 lenders originated or purchased a total of 2,637 loans in moderate-income geographies. The top five lenders were responsible for 667 loans and had a 25.3 percent market share. NBT originated or purchased 24 loans for a 0.9 percent market share. Seventy-seven lenders originated or purchased one loan each.

2022

The geographic distribution of home mortgage loans was good. The OCC considered the impact of heavy competition among home mortgage lenders and limited housing stock in low-income geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was below the aggregate percentage of all reporting lenders.

There were five low-income census tracts with 7,414 units, of which 27 percent were owner occupied and 13.9 percent were vacant. In 2022, 75 lenders originated or purchased a total of 207 loans in low-income geographies. The top five lenders were responsible for 62 loans and had a 30 percent market share. Forty-one lenders, including NBT, originated one loan each.

There were 47 moderate-income census tracts with 67,789 units, of which 40.8 percent were owner occupied and 16 percent were vacant. In 2022, 221 lenders originated or purchased a total of 2,862 loans in moderate-income geographies. The top five lenders were responsible for 636 loans and had a 22.2 percent market share. NBT originated or purchased 37 loans for a 1.3 percent market share. Ninety-four lenders originated or purchased one loan each.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania 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.

2020-2021

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was below the percentage of businesses located in those geographies. The

percentage of small loans to businesses originated or purchased in low-income geographies was well below, and in moderate-income geographies was below the aggregate percentage of all reporting lenders.

2022

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies exceeded the percentage of businesses located in those geographies. Aggregate data for all reporting lenders was not available.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Scranton MSA

Home Mortgage Loans

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

2020-2021

The distribution of home mortgage loans among individuals of different income levels was excellent. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low-income and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

2022

The distribution of home mortgage loans among individuals of different income levels was excellent. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

2020-2021

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

The OCC considered significant competition and the bank's limited market share for small loans to businesses. Collectively, the top ten lenders in the AA account for 56.5 percent of the market share and represent significant competition from credit card companies. The OCC considered the impact of the bank's small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 50 percent of small loans to businesses in the Scranton MSA. The majority of the loans with unknown revenues (94.3 percent) were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA. Aggregate data for all reporting lenders was not available.

Community Development Lending

The institution was a leader in making 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.

Scranton MSA

The level of CD lending was excellent. NBT made nine CD loans totaling \$20.9 million, which represented 25.3 percent of allocated tier 1 capital. Included in this total were six PPP loans totaling \$8.6 million that supported area businesses during the COVID-19 pandemic. By dollar volume, 58.8 percent of CD loans funded economic development activities and 41.2 percent funded revitalization and stabilization efforts.

Examples of CD loans in the AA include:

- A \$1.2 million to finance the renovation of a former school into a mixed-use property in a moderate-income census tract. The property includes 14 residential apartments and two commercial units.

- A \$6.2 million loan to finance the conversion of a long-vacant industrial building into 41 residential apartments in a low-income census tract. The building is located in an area the city of Scranton has been demolishing properties for revitalization.

Because the bank was responsive to CD needs and opportunities in the full-scope areas, broader statewide and regional loans that do not have a purpose, mandate, or function to serve the AA received consideration in the assessment. During the evaluation period, NBT made four CD loans totaling \$7.7 million, which represented 4.8 percent of allocated tier 1 capital. Included in this total were two PPP loans totaling \$3.7 million that supported businesses in Lancaster County and \$4 million in loans to fund revitalization and stabilization efforts in Lehigh County. This had a positive impact on performance.

Product Innovation and Flexibility

Scranton MSA

The institution made limited use of innovative or flexible lending practices in order to serve AA credit needs. NBT made 31 loans among the various flexible lending products available in the Scranton AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the New York CSA AA is stronger than the bank's overall performance in the full-scope area due to stronger geographic distributions. The bank's performance in the PA Non MSA AA was consistent with the bank's overall performance in the full-scope area. Performance differences in the limited-scope areas did not impact the overall conclusions for the state of Pennsylvania.

Refer to Tables O through R in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Scranton MSA is good.

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)
Full-Scope										
Scranton MSA	5	2,883	68	7,684	73	70.2	10,567	77.7	0	0
Limited-Scope										
New York CSA	1	120	11	1,842	12	11.5	1,962	14.4	0	0
PA Non-MSA	0	0	19	1,065	19	18.3	1,065	7.8	0	0
Total	6	3,003	98	10,591	104	100.0	13,594	100.0	0	0

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

**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.

Scranton MSA

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

During the evaluation period NBT made five investments totaling \$7.4 million and provided 63 qualifying grants and donations totaling \$251,000. The dollar volume of current- and prior-period investments represented 12.8 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs. By dollar volume, 97.6 percent of current period investments and donations funded affordable housing, 2.3 percent funded community services to LMI individuals, and less than 0.1 percent funded economic development.

The institution did not use innovative and/or complex investments to support CD initiatives.

Examples of qualified investments in the AA include:

- A \$5.0 million investment in a FNMA commercial mortgage-backed security that finances a low-income residential property in the Scranton MSA. All 200 units in the property are restricted to residents making 60 percent or less of the area median family income. The investment is responsive to an identified need for affordable housing in the AA.
- An investment in a mutual fund that invests in various community development initiatives, of which \$1.3 million was allocated to the Scranton MSA. Earmarked investments consisted of GNMA, FNMA, and FHLMC pools secured by properties in LMI census tracts. The investment is responsive to an identified need for affordable housing in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the New York CSA and PA Non MSA AAs were weaker than the bank's overall performance in the full-scope area

due to a lower level of CD investments. Weaker performance did not impact the Investment Test rating for the state of Pennsylvania.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Scranton MSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System 2020-2021											
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
Full-Scope											
Scranton MSA	51.8	12	48.0	8.3	8.3	58.3	25.0	3.2	20.5	52.2	23.6
Limited-Scope:											
New York CSA	17.1	5	20.0	0.0	0.0	100.0	0.0	0.0	21.8	74.2	4.0
PA Non MSA	31.0	8	32.0	0.0	0.0	87.5	12.5	0.0	10.8	80.6	8.6
Total	100.0	25	100.0	4.3	4.3	73.9	17.4	2.0	19.8	60.8	17.0

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

Distribution of Branch Delivery System 2022											
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
Full-Scope											
Scranton MSA	51.5	12	48.0	0.00	16.7	33.3	41.7	3.0	26.1	45.6	24.8
Limited-Scope											
New York CSA	17.2	5	20.0	0.0	40.0	20.0	40.0	0.6	21.9	65.8	10.9
PA Non MSA	31.3	8	32.0	0.0	0.0	75.0	25.0	0.0	5.8	79.1	15.0
Total	100.0	25	100.0	0.0	16.0	44.0	36.0	2.1	22.9	54.2	20.2

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

At the end of 2021, the bank’s distribution of branches in low-income geographies exceeded, and in moderate-income geographies was well below the percentage of the population living within those

geographies. In 2022, the bank’s distribution of branches in moderate-income geographies was below the percentage of the population living within those geographies. The bank did not have any branches in low-income geographies. This change is due to the income level of the census tract where one of the bank’s branches was located changed from low-income to unknown income. The OCC further considered four MUI branches and one branch in an area with unknown income that served moderate areas within the AA, which improved access and had a positive impact on the retail Service Test conclusion.

NBT offered ADS including ATMs, self-service telephone banking, and digital banking (online/mobile/mobile deposit). These systems provided additional delivery availability and access to banking services to both retail and business customers. NBT had 16 ATMs in the AA, of which 14 were deposit-taking. The distribution of ATMs in moderate-income geographies was poor. The bank did not have any ATMs in low-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope						
Scranton MSA	0	3	0	-1	0	-2
Limited-Scope						
New York CSA	0	0	0	0	0	0
PA Non MSA	0	0	0	0	0	0
Total	0	3	0	-1	0	-2

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

The institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed three branches during the evaluation period, one of which was in a moderate-income geography. The branch closures were the result of several factors related to branch profitability and low future growth expectations due to the level of competition near each branch.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. NBT maintained relatively standard business hours at all branch location in the AA. Nine of 12 branches were open from 9:00 a.m. to 5:00 p.m. Monday through Friday. The three remaining branches were open from 9:00 a.m. to 4:00 p.m. Monday to Friday, two of which had extended hours on Friday. Six branches were open from 9:00 a.m. to 12:00 p.m. on Saturdays, including the three branches with reduced Monday to Friday hours and both moderate-income branches. All 12 branches had drive-through facilities and deposit taking ATMs. NBT offered traditional banking products and services at all branch locations in the AA except for safe deposit boxes and night deposit services, which were not available at all branches due to physical space requirements.

Community Development Services

The institution was a leader in providing CD services. During the evaluation period, NBT provided 47 qualified CD service activities to 32 organizations in the Scranton MSA. Leadership was evident through board or committee participation with seven bank employees providing 1,055 service hours over

the evaluation period. In addition, six employees provided 315 hours of financial education to low- and moderate-income individuals or other community development services to organizations serving low- to moderate-income individuals or geographies. The bank's assistance was responsive to identified needs in the AA, namely through service on boards of affordable housing organizations.

Examples of CD services in the AA include:

- A vice president served as chairman of the board of a local housing authority, treasurer of a local housing corporation, and vice president of a local industrial development authority, providing 586 service hours over the evaluation period. The organizations are dedicated to providing low-income housing and supporting small business lending.
- A branch manager served as committee chair for an organization that promotes economic development and supports low- and moderate-income individuals, vice president of an organization that advocates for small businesses, and board member for an organization that provides community services to low- and moderate- income individuals, providing 192 service hours over the evaluation period.
- A senior vice president served as loan committee member for regional economic development agency and board member for two economic development organizations, providing 111 service hours over the evaluation period. The organizations provide grant assistance, contracting assistance, small and micro loans, business counseling, financial assistance, and space for startup business.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the New York CSA and PA Non MSA was consistent with the bank's overall performance in the full-scope area.

STATE OF VERMONT

CRA rating for the state of Vermont: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity, overall good geographic distribution of lending and overall adequate borrower distribution of lending
- Leader in CD lending which had a positive impact on the rating
- Significant level of CD investments
- Reasonably accessible retail service delivery systems
- Adequate level of CD services

Description of Institution's Operations in the state of Vermont

NBT delineated two AAs in the state of Vermont during the evaluation period. They included the entire Burlington-South Burlington VT MSA (Burlington MSA) and Rutland County (VT Non MSA). The branch in the VT Non MSA was closed on December 4, 2020.

As of year-end 2022, NBT had three branch locations and four ATMs, of which all were deposit-taking, within these AAs. During the evaluation period, the bank originated and purchased \$194.6 million or 6.6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Vermont represented NBT's fourth largest rated area in terms of deposits. Based on June 30, 2022, FDIC Summary of Deposit information, NBT had \$182.9 million in deposits, which represented 1.8 percent of the bank's adjusted total deposits. The bank ranked 18th in deposit market share with 0.9 percent out of 24 depository institutions. The top three competitors had 53.8 percent of the market share and included Manufacturers and Traders Trust Company with 38 branches and 23.8 percent market share, TD Bank, N.A. with 23 branches and 21.5 percent market share, and Community Bank, N.A. with 30 branches and 8.5 percent market share.

Burlington MSA

The following tables provides a summary of the demographics, including housing and business information for the Burlington-South Burlington, VT MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Burlington MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	2.1	23.4	57.4	14.9	2.1
Population by Geography	215,081	1.4	19.4	60.3	18.9	0.0
Housing Units by Geography	94,009	1.4	22.0	60.6	15.9	0.0
Owner-Occupied Units by Geography	57,434	1.0	13.2	65.6	20.2	0.0
Occupied Rental Units by Geography	27,714	2.5	37.1	51.3	9.1	0.0
Vacant Units by Geography	8,861	0.8	32.1	57.6	9.5	0.0
Businesses by Geography	28,411	0.9	23.5	53.9	21.6	0.2
Farms by Geography	1,241	0.5	13.5	66.9	19.1	0.0
Family Distribution by Income Level	52,010	20.5	17.9	23.1	38.5	0.0
Household Distribution by Income Level	85,148	23.7	16.1	18.8	41.4	0.0
Median Family Income MSA - 15540 Burlington-South Burlington, VT MSA		\$82,811	Median Housing Value			\$263,536
			Median Gross Rent			\$1,069
			Families Below Poverty Level			6.2%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Burlington MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	1.9	18.5	51.9	24.1	3.7
Population by Geography	225,562	2.3	18.5	58.5	19.7	1.0
Housing Units by Geography	98,488	2.3	19.2	60.2	17.2	1.1
Owner-Occupied Units by Geography	59,134	1.1	14.8	67.1	16.8	0.2
Occupied Rental Units by Geography	29,365	5.5	28.2	43.7	19.5	3.2
Vacant Units by Geography	9,989	0.7	19.2	67.6	12.3	0.3
Businesses by Geography	33,445	1.7	17.2	50.8	29.2	1.2
Farms by Geography	1,404	1.1	12.1	66.0	20.7	0.2
Family Distribution by Income Level	52,398	19.8	17.7	23.5	39.0	0.0
Household Distribution by Income Level	88,499	24.2	16.2	17.9	41.7	0.0
Median Family Income MSA - 15540 Burlington-South Burlington, VT MSA		\$95,011	Median Housing Value			\$294,269
			Median Gross Rent			\$1,248
			Families Below Poverty Level			5.2%
<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>						

The Burlington MSA AA consisted of all three counties that comprise the MSA including: Chittenden, Franklin, and Grand Isle counties. As of year-end 2022, NBT operated three branches and four ATMs, all of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT had \$182.9 million in deposits in the AA which comprised 1.8 percent of total bank adjusted deposits. NBT had 2.6 percent deposit market share which ranked eighth among all institutions. Competition was normal with 14 total FDIC-insured financial institutions operating 71 offices in the AA. The top three competitors had 68.1 percent of the market share and included TD Bank, N.A. with nine branches and 28.2 percent market share, Manufacturers and Traders Trust Company with 11 branches and 27.8 percent market share, and Community Bank, N.A. with 12 branches and 12.2 percent market share.

Based on information from the January 2023, Moody's Analytics report, The Burlington MSA economy has yet to fully recover from the COVID-19 pandemic. Moody's reported the Burlington MSA economy is forging ahead at a slower pace than its Northeast peers. Annual benchmark revisions to employment data revealed a stronger jobs recovery than initially indicated, placing payrolls just a hair shy of their pre-recession level. Most major industries in the area have added jobs over the past year; however, job growth has slowed over the past six months. Employment within the public and manufacturing sectors is still trending higher, driven by rising enrollment at the University of Vermont and Burlington being a semi-conductor production hub. The semiconductor producer's sales have taken a hit recently and are down almost 20 percent from one year earlier. As a result, the producer is laying off 150 local employees and the slowed demand for semiconductors will weigh on the Burlington MSA's manufacturing employment. Healthcare and leisure/hospitality payrolls have slipped in large part due to the weakness in the Canadian dollar deterring tourists from Canada. Slower job creation combined with steady expansion in the labor force has edged the unemployment rate higher in recent months after dipping below two percent through much of 2022. The housing market has also cooled, with single-family house prices plateauing since the fall, as higher mortgage rates have raised financing costs and reduced demand. Home sales have fallen sharply, and residential permitting has slowed.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Burlington MSA was 2.2 percent, compared to 4.8 percent in 2020 and 3.2 percent in 2021. The Burlington MSA unemployment rate was slightly lower than the 2.6 percent unemployment rate for the state of Vermont in 2022.

Based on FFIEC median family income ranges, low-income families in the Burlington VT MSA earned less than \$54,500 and moderate-income families earned between \$54,500-\$87,200. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Within the Burlington VT MSA, this calculated to a maximum monthly mortgage payment of \$1,363 for low-income borrowers and \$2,180 for moderate-income borrowers. Assuming a 30-year mortgage with a five 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 MSA median housing value would be \$2,547. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA. The housing value in the AA increased from \$327,000 in 2020 to \$474,450 in 2022, reflecting a change of 45.1 percent according to Realtor.com data.

The OCC relied on information provided from two community contacts to understand area needs and opportunities. The contacts represented organizations focused on affordable housing and economic development. The OCC also considered comments provided by the two community organizations as part

of a CRA listening session. The contacts indicated that there is a need for more capital to support development activities. The contacts noted the state’s population is aging and there is a need for more housing, including assisted living housing, for the growing elder population. The contacts also indicated there is a need for safe and affordable low- income housing in the state. Opportunities noted by the contacts include the Federal Reserve Bank of Boston’s Working Communities challenge, which is a three-year grant competition to bring together private, public, and nonprofit sectors to tackle problems affecting lower-income residents, such as poverty or lack of affordable housing. Contacts also noted opportunities for financial institutions to focus more on the credit needs of small businesses and providing financial literacy to the community.

Scope of Evaluation in the state of Vermont

The OCC selected one AA for full-scope review. A full-scope review was completed for the Burlington MSA as it is the largest AA in the state of Vermont in terms of deposits, branches, and lending activity. The VT Non MSA received a limited-scope review. Refer to the table in appendix A for more information.

In arriving at overall conclusions, the OCC placed more emphasis on the product category that had the higher percentage of lending in the AA. For the Burlington MSA and VT Non MSA, the OCC placed more emphasis on loans to small businesses. The OCC did not evaluate small loans to farms in the Burlington MSA or the VT Non MSA as the limited level of lending activity would not allow for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Vermont

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review the bank’s performance in the Burlington VT MSA is good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Burlington MSA	136	330	1	9	476	94.4	100
Limited-Scope:							
VT Non MSA	8	20	0	0	28	5.6	0
Total	144	350	1	9	504	100.0	100.0

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

Dollar Volume of Loans* (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Burlington MSA	123,149	69,136	21	20,528	212,834	98.9	100.0
Limited-Scope:							
VT Non MSA	1,296	1,027	0	0	2,323	1.1	0
Total	124,445	70,163	21	20,528	215,157	100.0	100.0

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

Burlington MSA

According to the FDIC's Summary of Deposits as of June 30, 2022, NBT ranked eighth out of 14 depository institutions (42nd percentile) with a deposit market share of 2.6 percent.

Based on the 2022 HMDA market share data, NBT ranked 26th out of 167 lenders (85th percentile) with a market share of 0.7 percent for home mortgage loans. The top three lenders were New England Federal Credit Union with 29.9 percent market share, Vermont Federal Credit Union with 8.4 percent market share, and Citizens Bank, N.A. with 3.7 percent market share.

Based on the 2021 CRA small business loan data, NBT ranked 13th out of 89 lenders (85th percentile) with a market share of 2.11 percent for small loans to businesses. The top three lenders were American Express National Bank with 16.5 percent market share, JP Morgan Chase Bank, N.A. with 9.8 percent market share, and Peoples United Bank, N.A. with 9.7 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses. The Burlington MSA AA only contains one low-income census tract.

Burlington MSA

Home Mortgage Loans

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

2020-2021

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

2022

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near to, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near to, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

2020-2021

The geographic distribution of small loans to businesses was good. The OCC placed more emphasis on the bank's performance in moderate-income geographies due to the low volume of businesses in the low-income geographies. Only 0.9 percent of businesses were located in low-income geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was near to, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies approximated, the aggregate percentage of all reporting lenders.

2022

The geographic distribution of small loans to businesses was poor. The OCC placed more emphasis on the bank's performance in moderate-income geographies due to the low volume of businesses in the low-income geographies. Only 1.7 percent of businesses were within low-income geographies. The percentage of small loans to businesses originated or purchased in low and moderate-income geographies was significantly below the percentage of businesses located in those geographies. Aggregate data for all reporting lenders was not available.

Lending Gap Analysis

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

Burlington MSA

Distribution of Loans by Income Level of the Borrower

The bank exhibited adequate distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

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

2020-2021

The distribution of home mortgage loans among individuals of different income levels was adequate. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low- and moderate-income borrowers. The percentage of home mortgage loans originated or purchased to low- and moderate-income borrowers was well below the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers was near to, and to moderate-income borrowers was well below, the aggregate percentage of all reporting lenders.

2022

The distribution of home mortgage loans among individuals of different income levels was poor. The OCC considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low- and moderate-income borrowers. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and moderate-income borrowers was well below, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low- and moderate-income borrowers was significantly below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

2020-2021

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

The OCC considered significant competition and the bank's limited market share for small loans to businesses. Collectively, the top 10 lenders in the AA account for 72.6 percent of the market share and represent significant competition from credit card companies. The OCC considered the impact of small loans to businesses with unavailable business revenue data. Borrower revenue information was not available for 27.4 percent of small loans to businesses in the Burlington MSA. The majority of the loans with unknown revenues (93 percent) were PPP loans, which did not require the bank to collect or consider gross annual revenues.

2022

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA.

The OCC considered significant competition and the bank's limited market share for small loans to businesses.

Community Development Lending

The institution was a leader in making 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.

Burlington MSA

The level of CD lending was excellent. NBT made nine CD loans totaling over \$20.5 million, which represented over 100 percent of allocated tier 1 capital. Included in this total were six PPP loans totaling \$9.3 million that supported area businesses during the COVID-19 pandemic. The bank was responsive to identified community needs including affordable housing and economic development.

By dollar volume, 60.6 percent of CD loans funded economic development activities, 26.7 percent funded affordable housing, and 25.5 percent funded revitalization and stabilization efforts.

Examples of CD loans in the AA include:

- A \$2.6 million loan to finance the purchase of a multifamily investment property in a low-income section of Burlington, VT innovative project to co-locate affordable housing with library services. The property consists of 28 units.
- A \$2.6 million PPP loan to retain 417 jobs in an LMI tract. The loan qualifies as it is revitalizing/stabilizing a moderate-income census tract.

Product Innovation and Flexibility

Burlington MSA

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, NBT made two loans among the various flexible lending products available in the Burlington AA.

Conclusions for Area Receiving a Limited-Scope Review

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

Refer to Tables O through R in the state of Vermont section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full Scope Review

Based on a full scope review the bank's performance in the Burlington MSA is good.

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)
Full-Scope										
Burlington MSA	5	2,089	33	982	38	82.6	3,071	82.4	0	0
Limited-Scope										
VT Non MSA	2	572	6	86	8	17.4	658	17.6	0	0
Total	7	2,661	39	1,068	46	100.0	3,729	100.0	0	0

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

**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.

Burlington MSA

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

During the evaluation period NBT made five investments totaling \$923,552 and provided 28 qualifying grants and donations totaling \$58,622. The dollar volume of current- and prior- period investments represented 4.8 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs. Investments were particularly responsive to the need for affordable housing within the assessment area. By dollar volume, 96 percent of current period investments and donations funded affordable housing and 4 percent funded community services to LMI individuals.

Examples of qualified investments in the AA include:

- A \$932,552 investment in a LIHTC fund to help fund 185 affordable housing units.
- A \$15,000 investment in a housing trust that supports homebuyers and affordable housing programs.

Because the bank was responsive to CD needs and opportunities in the full-scope area, broader statewide and regional investments that do not have a purpose, mandate, or function to serve the AA received consideration in the assessment. During the evaluation period, NBT made LIHTC investments totaling \$1.4 million in the broader statewide region which represented 7 percent of allocated tier 1 capital for the state of Vermont. This investment has a positive impact on performance.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Vermont Non MSA is consistent with the bank’s overall performance in the full scope area.

SERVICE TEST

The institution’s performance under the Service Test in Vermont is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review the bank’s performance in the Burlington MSA was adequate.

Retail Banking Services

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

Distribution of Branch Delivery System 2020-2021											
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
Full-Scope:											
Burlington VT MSA	95.9	3	75.0	0.0	33.3	33.3	33.3	1.4	19.4	60.3	18.9
Limited-Scope:											
VT Non MSA	4.1	1	25.0	0.0	100.0	0.0	0.0	0.0	20.2	65.5	14.3
Total	100.0	4	100.0	0.0	50.0	25.0	25.0	1.1	19.5	61.5	17.9

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

Distribution of Branch Delivery System 2022											
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
Full-Scope:											
Burlington VT MSA	100.0	3	100.0	0.0	0.0	66.7	33.3	2.3	18.5	58.5	19.7
Limited-Scope:											
VT Non MSA	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	100.0	3	100.0	0.0	0.0	66.7	33.3	2.3	18.5	58.5	19.7

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

In 2020-21, the bank's distribution of branches in low-income geographies was below, and in moderate income geographies exceeded, the percentage of the population living within those geographies. In 2022, the bank's distribution of branches in low and moderate-income geographies was below the percentage of the population living within those geographies. The bank's geographic distribution of branches was negatively impacted by the 2020 census, which changed one of the bank's branches from a moderate-income census tract to a middle-income census tract. The impact of branch distribution in the low-income geographies is limited, as the AA includes one low-income census tract with only 2.3 percent of the AAs total population. The OCC further considered one MUI branch that served low- and moderate- areas within the AA, which improved access and had a positive impact on the retail service test conclusion.

NBT offered ADS including ATMs, self-service telephone banking, and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. NBT had four ATMs in the AA, of which all were deposit-taking. The distribution of ATMs in low-income geographies was poor and in moderate-income geographies was adequate.

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

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

The institution did not open or close any branches within the full-scope AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA. NBT maintained standard business hours at all branch location in the AA. The bank offered extended hours on Saturday for two of the three branches.

Community Development Services

The institution provided an adequate level of CD services. During the evaluation period, NBT provided five qualified CD service activities to three organizations in the Burlington MSA. A total of three bank employees provided 18.5 service hours over the evaluation period. The OCC considered the fact that the Burlington MSA opened up slower than most areas after the COVID-19 pandemic.

Examples of CD services in the AA include:

- A senior level bank officer delivered meals to low-to-moderate income individuals and the elderly during the COVID-19 pandemic.
- A senior level bank officer served as a volunteer for an organization that assists low-income individuals and families with shopping for food and raising money for a local food pantry for low-income individuals and families during COVID-19.

Conclusions for VT Non MSA Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Vermont Non MSA is consistent with the bank's overall performance in the full-scope area. The OCC considered that the bank operated in the limited-scope AA for only one year out of 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:	January 1, 2020 – December 31, 2022	
Bank Products Reviewed:	Home mortgage, small business, and small farm loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable	Not applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Connecticut		
Hartford MSA	Full scope	Hartford County, Middlesex County, Tolland County
State of Maine		
Burlington MSA	Full scope	Cumberland County, Sagadahoc County, York County
State of Massachusetts		
Pittsfield MSA	Full Scope	Berkshire County
State of New Hampshire		
Providence CSA	Full scope	Hillsborough County (2020-2022), Rockingham County (2020), Strafford County (2020), Merrimack County (2021-2022)
NH Non MSA	Limited scope	Cheshire County
State of New York		
NY Non MSA	Full scope	Chenango County, Clinton County, Cortland County, Delaware County, Essex County, Franklin County, Greene County, Hamilton County, Otsego County, St. Lawrence County
Albany CSA	Full scope	Albany County, Fulton County, Montgomery County, Rensselaer County, Saratoga County, Schenectady County, Schoharie County, Warren County, Washington County
Syracuse MSA	Limited scope	Madison County, Onondaga County, Oswego County
Utica MSA	Limited scope	Herkimer County, Oneida County
Binghamton MSA	Limited scope	Broome County, Tioga County
State of Pennsylvania		
Scranton MSA	Full scope	Lackawanna County, Luzerne County, Wyoming County
New York CSA	Limited scope	Monroe County, Pike County
PA Non MSA	Limited scope	Susquehanna County, Wayne County
State of Vermont		
Burlington MSA	Full scope	Chittenden County, Franklin County, Grand Isle County
VT Non MSA	Limited scope	Rutland County (2020)

Appendix B: Summary of MMSA and State Ratings

RATINGS NBT BANK, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State
NBT Bank, N.A.	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
State of Connecticut	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Maine	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Massachusetts	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of New Hampshire	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of New York	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Pennsylvania	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Vermont	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

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

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

State of Connecticut

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Hartford MSA	9	10,857	100.0	59,684	3.7	55.6	4.1	10.9	11.1	10.2	42.5	22.2	41.1	42.8	11.1	44.6	0.0	0.0	0.0
Total	9	10,857	100.0	59,684	3.7	55.6	4.1	10.9	11.1	10.2	42.5	22.2	41.1	42.8	11.1	44.6	0.0	0.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Hartford MSA	30	26,695	100.0	34,706	3.0	6.7	4.3	12.2	20.0	13.5	47.9	43.3	46.0	36.9	30.0	36.1	0.0	0.0	0.1
Total	30	26,695	100.0	34,706	3.0	6.7	4.3	12.2	20.0	13.5	47.9	43.3	46.0	36.9	30.0	36.1	0.0	0.0	0.1

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%

State of Connecticut

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Hartford MSA	9	10,857	100.0	59,684	22.3	0.0	9.9	16.5	0.0	22.7	20.7	11.1	22.4	40.5	0.0	29.5	0.0	88.9	15.5
Total	9	10,857	100.0	59,684	22.3	0.0	9.9	16.5	0.0	22.7	20.7	11.1	22.4	40.5	0.0	29.5	0.0	88.9	15.5

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Hartford MSA	30	26,695	100.0	34,706	22.2	23.3	11.3	16.8	26.7	25.9	20.9	16.7	22.7	40.0	10.0	27.5	0.0	23.3	12.6
Total	30	26,695	100.0	34,706	22.2	23.3	11.3	16.8	26.7	25.9	20.9	16.7	22.7	40.0	10.0	27.5	0.0	23.3	12.6

*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%*

State of Connecticut

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Hartford MSA	30	13,191	100.0	37,798	10.7	13.3	9.1	12.9	3.3	12.8	39.8	40.0	41.1	36.2	43.3	36.2	0.3	0.0	0.7
Total	30	13,191	100.0	37,798	10.7	13.3	9.1	12.9	3.3	12.8	39.8	40.0	41.1	36.2	43.3	36.2	0.3	0.0	0.7

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Business es	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Business es	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Hartford MSA	43	14,365	100.0	--	8.8	11.6	--	15.0	7.0	--	45.4	62.8	--	30.0	16.3	--	0.8	2.3	--
Total	43	14,365	100.0	--	8.8	11.6	--	15.0	7.0	--	45.4	62.8	--	30.0	16.3	--	0.8	2.3	--

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

State of Connecticut

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Hartford MSA	30	13,191	100.0	37,798	87.9	33.3	45.0	3.7	56.7	8.3	10.0
Total	30	13,191	100.0	37,798	87.9	33.3	45.0	3.7	56.7	8.3	10.0

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

Table 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
Hartford MSA	43	14,365	100.0	--	89.2	46.5	--	3.2	53.5	7.6	0.0
Total	43	14,365	100.0	--	89.2	46.5	--	3.2	53.5	7.6	0.0

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

State of Maine

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt			
Portland MSA	32	153,055	100.0	37,139	0.9	6.3	1.7	16.4	37.5	18.0	60.5	46.9	57.9	22.3	9.4	22.4	0.0	0.0	0.0			
Total	32	153,055	100.0	37,139	0.9	6.3	1.7	16.4	37.5	18.0	60.5	46.9	57.9	22.3	9.4	22.4	0.0	0.0	0.0			

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt			
Portland MSA	8	34,227	100.0	20,487	0.1	0.0	0.2	17.7	25.0	18.5	55.2	50.0	55.0	27.0	25.0	26.2	0.0	0.0	0.0			
Total	8	34,227	100.0	20,487	0.1	0.0	0.2	17.7	25.0	18.5	55.2	50.0	55.0	27.0	25.0	26.2	0.0	0.0	0.0			

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%

State of Maine

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
Portland MSA	32	153,055	100.0	37,139	20.7	0.0	6.9	17.8	12.5	19.6	21.8	15.6	22.3	39.7	28.1	36.4	0.0	43.8	14.8		
Total	32	153,055	100.0	37,139	20.7	0.0	6.9	17.8	12.5	19.6	21.8	15.6	22.3	39.7	28.1	36.4	0.0	43.8	14.8		

*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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
Portland MSA	8	34,227	100.0	20,487	18.4	0.0	7.3	18.2	25.0	19.6	24.1	0.0	22.9	39.4	50.0	39.9	0.0	25.0	10.4		
Total	8	34,227	100.0	20,487	18.4	0.0	7.3	18.2	25.0	19.6	24.1	0.0	22.9	39.4	50.0	39.9	0.0	25.0	10.4		

*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%*

State of Maine

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
Portland MSA	45	10,237	100.0	16,394	2.6	0.0	2.5	26.1	35.6	23.4	50.2	48.9	50.7	21.2	15.6	22.8	0.0	0.0	0.7		
Total	45	10,237	100.0	16,394	2.6	0.0	2.5	26.1	35.6	23.4	50.2	48.9	50.7	21.2	15.6	22.8	0.0	0.0	0.7		

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
Portland MSA	11	2,499	100.0	--	0.2	0.0	--	20.4	18.2	--	54.6	36.4	--	24.8	45.5	--	0.0	0.0	--		
Total	11	2,499	100.0	--	0.2	0.0	--	20.4	18.2	--	54.6	36.4	--	24.8	45.5	--	0.0	0.0	--		

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

State of Maine

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
Portland MSA	45	10,237	100.0	16,394	84.6	33.3	44.2	5.3	13.3	10.0	53.3
Total	45	10,237	100.0	16,394	84.6	33.3	44.2	5.3	13.3	10.0	53.3

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 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
Portland MSA	11	2,499	100.0	--	87.6	27.3	--	4.1	45.5	8.2	27.3
Total	11	2,499	100.0	--	87.6	27.3	--	4.1	45.5	8.2	27.3

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

State of Massachusetts

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt		
Pittsfield MSA	78	27,440	100.0	4,889	3.1	11.5	3.8	10.2	6.4	7.9	55.5	57.7	52.5	31.2	24.4	35.9	0.0	0.0	0.0		
Total	78	27,440	100.0	4,889	3.1	11.5	3.8	10.2	6.4	7.9	55.5	57.7	52.5	31.2	24.4	35.9	0.0	0.0	0.0		

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt		
Pittsfield MSA	45	23,519	100.0	3,775	0.3	8.9	0.9	15.4	17.8	17.5	56.5	40.0	55.6	27.8	33.3	26.0	0.0	0.0	0.0		
Total	45	23,519	100.0	3,775	0.3	8.9	0.9	15.4	17.8	17.5	56.5	40.0	55.6	27.8	33.3	26.0	0.0	0.0	0.0		

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%

State of Massachusetts

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
Pittsfield MSA	78	27,440	100.0	4,889	21.3	11.5	9.0	17.6	16.7	18.6	20.5	20.5	19.6	40.6	26.9	39.5	0.0	24.4	13.3		
Total	78	27,440	100.0	4,889	21.3	11.5	9.0	17.6	16.7	18.6	20.5	20.5	19.6	40.6	26.9	39.5	0.0	24.4	13.3		

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
Pittsfield MSA	45	23,519	100.0	3,775	19.7	0.0	8.0	17.8	15.6	21.2	22.1	20.0	22.9	40.4	35.6	38.8	0.0	28.9	9.1		
Total	45	23,519	100.0	3,775	19.7	0.0	8.0	17.8	15.6	21.2	22.1	20.0	22.9	40.4	35.6	38.8	0.0	28.9	9.1		

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%

State of Massachusetts

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Pittsfield MSA	87	9,449	100.0	2,700	14.2	10.3	11.0	6.5	3.4	7.2	41.8	52.9	39.9	37.4	33.3	40.4	0.0	0.0	1.5
Total	87	9,449	100.0	2,700	14.2	10.3	11.0	6.5	3.4	7.2	41.8	52.9	39.9	37.4	33.3	40.4	0.0	0.0	1.5

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Pittsfield MSA	24	6,021	100.0	--	17.5	4.2	--	13.0	8.3	--	46.0	58.3	--	23.4	29.2	--	0.0	0.0	--
Total	24	6,021	100.0	--	17.5	4.2	--	13.0	8.3	--	46.0	58.3	--	23.4	29.2	--	0.0	0.0	--

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

State of Massachusetts

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
Pittsfield MSA	87	9,449	100.0	2,700	84.5	39.1	44.2	4.7	18.4	10.8	42.5
Total	87	9,449	100.0	2,700	84.5	39.1	44.2	4.7	18.4	10.8	42.5

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 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
Pittsfield MSA	24	6,021	100.0	--	87.0	66.7	--	3.9	29.2	9.1	4.2
Total	24	6,021	100.0	--	87.0	66.7	--	3.9	29.2	9.1	4.2

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

State of New Hampshire

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020
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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Providence CSA	125	112,128	100.0	64,779	1.3	20.8	1.7	15.1	15.2	13.6	51.3	39.2	49.7	32.3	24.8	35.0	0.0	0.0	0.0
Total	125	112,128	100.0	64,779	1.3	20.8	1.7	15.1	15.2	13.6	51.3	39.2	49.7	32.3	24.8	35.0	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2020 - 12/31/2020 Bank Data, 2020 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																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Providence CSA	66	35,187	100.0	34,888	1.6	9.1	2.6	12.9	24.2	13.0	44.7	34.8	42.3	40.9	31.8	42.1	0.0	0.0	0.0
Total	66	35,187	100.0	34,888	1.6	9.1	2.6	12.9	24.2	13.0	44.7	34.8	42.3	40.9	31.8	42.1	0.0	0.0	0.0

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

State of New Hampshire

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
NH Non MSA	34	14,563	100.0	2,884	0.0	0.0	0.0	12.1	11.8	8.5	75.6	55.9	73.3	12.3	32.4	18.2	0.0	0.0	0.0	
Total	34	14,563	100.0	2,884	0.0	0.0	0.0	12.1	11.8	8.5	75.6	55.9	73.3	12.3	32.4	18.2	0.0	0.0	0.0	

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Providence CSA	38	41,322	76.0	18,624	1.3	7.9	2.2	11.0	23.7	13.2	48.4	44.7	46.0	39.3	23.7	38.6	0.0	0.0	0.0	
NH Non MSA	12	6,241	24.0	1,882	0.0	0.0	0.0	13.9	33.3	15.0	86.1	66.7	85.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	50	47,563	100.0	20,506	1.2	6.0	2.0	11.4	26.0	13.3	53.0	50.0	49.6	34.5	18.0	35.1	0.0	0.0	0.0	

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%

State of New Hampshire

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020
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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Providence CSA	125	112,128	100.0	64,779	19.2	3.2	5.7	17.5	7.2	19.3	22.5	13.6	25.1	40.8	30.4	35.7	0.0	45.6	14.3
Total	125	112,128	100.0	64,779	19.2	3.2	5.7	17.5	7.2	19.3	22.5	13.6	25.1	40.8	30.4	35.7	0.0	45.6	14.3

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Providence CSA	66	35,187	100.0	34,888	19.3	1.5	5.4	16.9	13.6	20.1	22.1	12.1	25.8	41.7	30.3	35.0	0.0	42.4	13.7
Total	66	35,187	100.0	34,888	19.3	1.5	5.4	16.9	13.6	20.1	22.1	12.1	25.8	41.7	30.3	35.0	0.0	42.4	13.7

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

State of New Hampshire

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
NH Non MSA	34	14,563	100.0	2,884	20.0	0.0	6.3	18.0	14.7	21.3	23.0	17.6	27.3	39.1	35.3	32.4	0.0	32.4	12.7		
Total	34	14,563	100.0	2,884	20.0	0.0	6.3	18.0	14.7	21.3	23.0	17.6	27.3	39.1	35.3	32.4	0.0	32.4	12.7		

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
Providence CSA	38	41,322	76.0	18,624	18.3	7.9	7.1	18.3	10.5	21.5	22.9	10.5	27.0	40.5	42.1	34.7	0.0	28.9	9.8		
NH Non MSA	12	6,241	24.0	1,882	17.4	8.3	7.0	21.2	16.7	24.6	25.2	0.0	26.5	36.3	41.7	32.4	0.0	33.3	9.5		
Total	50	47,563	100.0	20,506	18.2	8.0	7.1	18.6	12.0	21.8	23.1	8.0	26.9	40.0	42.0	34.4	0.0	30.0	9.7		

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%

State of New Hampshire

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Providence CSA	160	27,362	100.0	26,452	3.8	9.4	3.2	18.3	15.6	17.0	47.9	51.3	49.1	29.7	23.1	30.0	0.3	0.6	0.7
Total	160	27,362	100.0	26,452	3.8	9.4	3.2	18.3	15.6	17.0	47.9	51.3	49.1	29.7	23.1	30.0	0.3	0.6	0.7

Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 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																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Providence CSA	90	14,973	100.0	14,615	5.8	4.4	5.5	18.7	18.9	17.0	39.3	46.7	39.0	35.9	30.0	37.7	0.3	0.0	0.8
Total	90	14,973	100.0	14,615	5.8	4.4	5.5	18.7	18.9	17.0	39.3	46.7	39.0	35.9	30.0	37.7	0.3	0.0	0.8

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

State of New Hampshire

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
NH Non MSA	85	17,817	100.0	1,785	0.0	0.0	0.0	6.8	0.0	6.7	79.9	80.0	78.7	13.3	20.0	13.9	0.0	0.0	0.7		
Total	85	17,817	100.0	1,785	0.0	0.0	0.0	6.8	0.0	6.7	79.9	80.0	78.7	13.3	20.0	13.9	0.0	0.0	0.7		

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	Aggt	% Businesses	% Bank Loans	Aggt	% Business es	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
Providence CSA	42	9,688	68.9	--	6.1	2.4	--	15.3	16.7	--	43.0	42.9	--	35.4	38.1	--	0.3	0.0	--		
NH Non MSA	19	5,903	31.1	--	0.0	0.0	--	13.3	26.3	--	86.7	73.7	--	0.0	0.0	--	0.0	0.0	--		
Total	61	15,591	100.0	--	5.5	1.6	--	15.1	19.7	--	47.6	52.5	--	31.7	26.2	--	0.2	0.0	--		

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

State of New Hampshire

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020
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
Providence CSA	160	27,362	100.0	26,452	87.3	28.8	40.6	4.6	30.0	8.1	41.3
Total	160	27,362	100.0	26,452	87.3	28.8	40.6	4.6	30.0	8.1	41.3

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Providence CSA	90	14,973	100.0	14,615	87.5	33.3	50.7	4.3	26.7	8.2	40.0
Total	90	14,973	100.0	14,615	87.5	33.3	50.7	4.3	26.7	8.2	40.0

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

State of New Hampshire

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
NH Non MSA	85	17,817	100.0	1,785	86.6	29.4	47.9	4.3	42.4	9.0	28.2
Total	85	17,817	100.0	1,785	86.6	29.4	47.9	4.3	42.4	9.0	28.2

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 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
Providence CSA	42	9,688	68.9	--	87.8	28.6	--	4.0	50.0	8.2	21.4
NH Non MSA	19	5,903	31.1	--	87.0	52.6	--	4.1	26.3	8.9	21.1
Total	61	15,591	100.0	--	87.7	36.1	--	4.0	42.6	8.2	21.3

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

State of New York

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Albany CSA	845	178,898	22.2	43,860	2.6	1.3	2.6	13.5	16.1	13.0	59.5	65.3	57.8	24.4	17.2	26.5	0.0	0.1	0.0	
NY Non MSA	1,379	211,277	36.3	12,409	0.1	0.0	0.2	6.1	4.2	5.9	78.1	76.3	73.8	15.7	19.4	20.1	0.0	0.1	0.0	
Binghamton MSA	237	29,010	6.2	6,497	2.7	2.1	2.4	9.3	8.9	9.7	60.1	59.9	55.4	27.9	29.1	32.4	0.0	0.0	0.0	
Syracuse MSA	815	123,472	21.4	20,946	2.6	2.0	2.0	14.0	17.5	12.7	51.7	41.5	49.5	31.6	38.9	35.8	0.1	0.1	0.1	
Utica MSA	525	95,147	13.8	8,052	5.0	1.9	4.2	7.2	5.7	7.1	60.0	50.3	54.3	27.8	42.1	34.3	0.0	0.0	0.0	
Total	3,801	637,803	100.0	91,764	2.4	1.1	2.3	11.1	10.2	11.2	61.5	61.8	57.6	25.0	26.8	28.8	0.0	0.1	0.0	

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Albany CSA	326	118,537	20.2	31,180	3.0	1.8	3.9	13.6	18.7	14.2	53.2	54.0	51.3	29.9	25.5	30.1	0.3	0.0	0.4	
NY Non MSA	559	83,297	34.7	9,383	0.3	0.0	0.7	13.7	10.7	12.1	69.9	69.2	69.1	16.0	20.0	18.1	0.0	0.0	0.0	
Binghamton MSA	101	13,940	6.3	5,096	1.1	1.0	1.1	14.7	11.9	16.1	49.3	50.5	45.9	34.9	36.6	36.7	0.1	0.0	0.3	
Syracuse MSA	375	86,575	23.3	15,521	2.3	2.1	2.3	15.6	21.3	15.8	49.5	40.5	47.6	32.2	35.5	33.7	0.4	0.5	0.6	
Utica MSA	251	40,586	15.6	6,923	2.8	1.6	3.0	14.6	11.2	13.4	56.5	50.2	55.6	24.4	36.7	26.5	1.7	0.4	1.5	
Total	1,612	342,935	100.0	68,103	2.1	1.2	2.8	14.3	15.0	14.3	55.6	55.3	52.9	27.5	28.4	29.4	0.4	0.2	0.5	

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

State of New York

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Albany CSA	845	178,898	22.2	43,860	20.8	7.8	8.3	17.7	16.8	22.3	22.3	21.5	24.4	39.3	43.4	33.1	0.0	10.4	11.8
NY Non MSA	1,379	211,277	36.3	12,409	20.9	4.6	4.6	17.2	17.7	15.9	21.7	20.8	22.4	40.2	50.5	45.4	0.0	6.3	11.8
Binghamton MSA	237	29,010	6.2	6,497	21.6	11.8	6.9	16.9	26.6	19.3	21.6	19.8	23.0	39.9	38.0	35.6	0.0	3.8	15.2
Syracuse MSA	815	123,472	21.4	20,946	21.8	6.4	9.0	17.2	19.3	20.9	20.4	22.5	23.0	40.6	48.0	34.8	0.0	3.9	12.2
Utica MSA	525	95,147	13.8	8,052	22.0	6.7	8.5	16.9	15.4	19.8	21.5	23.6	24.3	39.6	50.3	35.9	0.0	4.0	11.4
Total	3,801	637,803	100.0	91,764	21.2	6.4	7.9	17.3	18.1	20.7	21.6	21.7	23.7	39.8	47.6	35.6	0.0	6.2	12.1

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Albany CSA	326	118,537	20.2	31,180	21.4	10.1	10.3	17.8	17.8	23.8	21.4	21.5	25.1	39.4	37.4	30.2	0.0	13.2	10.6
NY Non MSA	559	83,297	34.7	9,383	21.1	7.7	6.4	17.3	19.0	18.2	20.8	20.0	23.3	40.8	44.9	41.7	0.0	8.4	10.4
Binghamton MSA	101	13,940	6.3	5,096	21.4	6.9	9.3	17.7	25.7	22.6	20.4	18.8	22.5	40.6	42.6	33.4	0.0	5.9	12.2
Syracuse MSA	375	86,575	23.3	15,521	21.9	10.7	11.2	17.4	17.6	23.3	20.6	20.8	24.3	40.1	45.9	31.4	0.0	5.1	9.8
Utica MSA	251	40,586	15.6	6,923	22.0	6.0	10.6	16.6	17.1	22.9	21.6	25.1	24.5	39.8	47.4	32.1	0.0	4.4	9.9
Total	1,612	342,935	100.0	68,103	21.5	8.6	9.9	17.5	18.5	22.7	21.0	21.2	24.4	40.0	43.9	32.5	0.0	7.8	10.5

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

State of New York

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Albany CSA	1,816	187,763	28.6	24,516	11.4	5.2	9.4	12.9	15.8	12.0	51.0	57.4	52.2	24.4	21.1	25.7	0.3	0.5	0.7
NY Non MSA	1,873	160,088	29.5	9,216	1.0	0.6	0.8	8.8	8.9	7.0	70.0	72.5	70.8	19.7	17.7	20.1	0.4	0.2	1.3
Binghamton MSA	574	57,417	9.0	3,915	9.7	15.0	7.5	11.9	11.8	13.2	57.2	59.6	57.4	21.2	13.6	21.4	0.0	0.0	0.5
Syracuse MSA	1,365	169,380	21.5	13,299	8.1	5.0	6.6	14.0	11.6	13.2	42.4	52.7	44.6	33.3	29.0	33.3	2.2	1.6	2.3
Utica MSA	728	88,486	11.5	5,432	12.7	11.3	11.1	12.8	16.1	11.0	46.7	41.9	47.8	26.3	28.4	28.7	1.4	2.3	1.4
Total	6,356	663,134	100.0	56,378	9.0	5.4	7.4	12.4	12.6	11.5	52.1	59.3	53.2	25.6	22.0	26.6	0.8	0.8	1.2

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Albany CSA	349	50,826	34.2	--	6.4	2.3	--	12.3	15.5	--	48.3	43.8	--	25.4	34.1	--	7.7	4.3	--
NY Non MSA	258	34,741	25.3	--	0.7	0.0	--	15.3	12.8	--	63.5	69.8	--	20.2	17.4	--	0.3	0.0	--
Binghamton MSA	75	9,602	7.4	--	10.2	21.3	--	16.0	16.0	--	42.2	38.7	--	30.5	22.7	--	1.1	1.3	--
Syracuse MSA	220	34,408	21.6	--	7.0	3.6	--	14.7	19.1	--	42.9	46.4	--	29.2	22.7	--	6.2	8.2	--
Utica MSA	118	14,064	11.6	--	7.3	6.8	--	13.3	7.6	--	48.0	44.9	--	23.2	33.1	--	8.2	7.6	--
Total	1,020	143,641	100.0	--	6.0	3.9	--	13.7	14.7	--	49.0	50.7	--	25.6	26.5	--	5.7	4.2	--

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

State of New York

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
Albany CSA	1,816	187,763	28.6	24,516	85.4	27.2	42.0	4.1	27.8	10.5	45.0
NY Non MSA	1,873	160,088	29.5	9,216	81.6	26.6	43.5	4.5	19.0	13.9	54.4
Binghamton MSA	574	57,417	9.0	3,915	83.1	24.6	44.9	4.8	26.0	12.1	49.5
Syracuse MSA	1,365	169,380	21.5	13,299	83.7	30.3	42.8	5.0	29.6	11.3	40.1
Utica MSA	728	88,486	11.5	5,432	83.0	27.7	46.0	4.9	28.3	12.1	44.0
Total	6,356	663,134	100.0	56,378	84.0	27.5	43.0	4.5	25.5	11.5	47.0

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 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
Albany CSA	349	50,826	34.2	--	85.9	49.6	--	3.8	44.4	10.3	6.0
NY Non MSA	258	34,741	25.3	--	82.0	57.0	--	4.2	36.8	13.8	6.2
Binghamton MSA	75	9,602	7.4	--	83.5	53.3	--	4.5	40.0	12.0	6.7
Syracuse MSA	220	34,408	21.6	--	84.0	43.6	--	4.7	49.5	11.3	6.8
Utica MSA	118	14,064	11.6	--	83.4	44.1	--	4.6	50.8	11.9	5.1
Total	1,020	143,641	100.0	--	84.5	49.8	--	4.2	44.0	11.3	6.2

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

State of New York

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt
Albany CSA	146	10,470	32.7	375	1.7	1.4	0.7	10.7	33.6	14.4	67.4	61.6	69.4	20.2	3.4	15.5	0.1	0.0	0.0
NY Non MSA	151	7,848	33.8	370	0.1	0.0	0.0	4.2	0.7	2.2	81.6	92.1	88.8	14.1	7.3	9.0	0.0	0.0	0.0
Binghamton MSA	25	1,379	5.6	84	1.8	0.0	0.0	5.1	0.0	1.5	74.0	100.0	86.4	19.1	0.0	12.1	0.0	0.0	0.0
Syracuse MSA	68	3,409	15.2	235	2.0	0.0	3.1	12.7	17.6	14.9	50.9	70.6	47.2	33.8	11.8	33.8	0.6	0.0	1.0
Utica MSA	57	4,896	12.8	140	0.9	0.0	0.0	2.7	0.0	0.0	71.2	89.5	79.6	25.2	10.5	20.4	0.0	0.0	0.0
Total	447	28,002	100.0	1,204	1.3	0.4	0.9	8.2	13.9	8.4	68.6	79.0	72.9	21.7	6.7	17.7	0.1	0.0	0.2

*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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt
Albany CSA	47	4,544	32.9	--	1.3	0.0	--	13.0	40.4	--	60.6	44.7	--	24.0	14.9	--	1.1	0.0	--
NY Non MSA	46	4,840	32.2	--	0.2	0.0	--	12.0	2.2	--	75.6	93.5	--	12.2	4.3	--	0.0	0.0	--
Binghamton MSA	4	407	2.8	--	1.8	0.0	--	7.7	0.0	--	62.6	75.0	--	27.9	25.0	--	0.0	0.0	--
Syracuse MSA	17	898	11.9	--	1.8	0.0	--	13.9	23.5	--	54.0	52.9	--	29.3	23.5	--	1.0	0.0	--
Utica MSA	29	3,588	20.3	--	0.8	0.0	--	7.3	0.0	--	67.0	69.0	--	24.3	31.0	--	0.5	0.0	--
Total	143	14,277	100.0	--	1.1	0.0	--	12.0	16.8	--	63.9	67.1	--	22.3	16.1	--	0.7	0.0	--

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

State of New York

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albany CSA	146	10,470	32.7	375	97.5	50.0	51.9	1.6	24.7	0.9	25.3
NY Non MSA	151	7,848	33.8	370	97.0	46.4	38.6	1.9	9.9	1.1	43.7
Binghamton MSA	25	1,379	5.6	84	98.0	52.0	48.5	1.3	4.0	0.7	44.0
Syracuse MSA	68	3,409	15.2	235	95.8	47.1	47.7	2.4	5.9	1.8	47.1
Utica MSA	57	4,896	12.8	140	97.4	54.4	53.4	0.8	17.5	1.8	28.1
Total	447	28,002	100.0	1,204	97.1	49.0	47.0	1.7	14.8	1.2	36.2

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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albany CSA	47	4,544	32.9	--	97.5	57.4	--	1.6	40.4	0.9	2.1
NY Non MSA	46	4,840	32.2	--	97.0	60.9	--	1.9	28.3	1.1	10.9
Binghamton MSA	4	407	2.8	--	97.7	100.0	--	1.6	0.0	0.7	0.0
Syracuse MSA	17	898	11.9	--	95.8	88.2	--	2.4	11.8	1.8	0.0
Utica MSA	29	3,588	20.3	--	97.3	69.0	--	0.9	31.0	1.9	0.0
Total	143	14,277	100.0	--	97.0	65.7	--	1.8	30.1	1.2	4.2

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

State of Pennsylvania

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Scranton MSA	474	65,016	54.4	19,146	1.6	0.4	1.5	14.2	8.0	13.6	56.5	57.4	51.8	27.6	34.0	33.0	0.0	0.2	0.1	
PA Non MSA	217	28,714	24.9	3,733	0.0	0.0	0.0	8.7	6.5	7.0	81.7	86.6	85.5	9.5	6.9	7.5	0.0	0.0	0.0	
New York CSA	181	31,432	20.8	13,703	0.0	0.0	0.0	21.1	24.9	21.9	74.9	74.6	75.0	4.0	0.6	3.0	0.0	0.0	0.0	
Total	872	125,161	100.0	36,582	1.0	0.2	0.8	15.4	11.1	16.1	64.2	68.2	63.9	19.4	20.3	19.2	0.0	0.1	0.0	

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Scranton MSA	232	36,462	54.6	14,101	1.3	0.4	1.5	18.1	15.9	20.0	52.0	53.9	47.7	28.5	29.7	30.7	0.1	0.0	0.1	
New York CSA	96	15,347	22.6	9,635	0.6	0.0	1.1	23.4	44.8	24.9	64.8	46.9	63.1	10.5	8.3	9.9	0.7	0.0	0.9	
PA Non MSA	97	13,278	22.8	2,740	0.0	0.0	0.0	5.4	9.3	3.8	78.4	58.8	76.9	16.2	32.0	19.3	0.0	0.0	0.0	
Total	425	65,086	100.0	26,476	1.0	0.2	1.2	18.0	20.9	20.1	58.4	53.4	56.3	22.3	25.4	22.0	0.3	0.0	0.4	

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%

State of Pennsylvania

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Scranton MSA	474	65,016	54.4	19,146	21.3	12.2	8.1	17.6	18.6	18.0	20.5	24.7	20.5	40.6	38.6	34.3	0.0	5.9	19.1
New York CSA	181	31,432	20.8	13,703	23.3	12.2	7.3	19.7	24.9	19.4	21.8	22.7	21.7	35.2	37.6	32.6	0.0	2.8	19.0
PA Non MSA	217	28,714	24.9	3,733	16.6	9.7	3.4	17.4	13.8	11.8	22.6	24.0	18.4	43.4	49.3	49.0	0.0	3.2	17.4
Total	872	125,161	100.0	36,582	21.3	11.6	7.3	18.1	18.7	17.9	21.1	24.1	20.7	39.5	41.1	35.2	0.0	4.6	18.9

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Scranton MSA	232	36,462	54.6	14,101	21.6	9.1	9.0	17.3	19.0	19.7	20.5	23.7	21.5	40.6	42.2	33.6	0.0	6.0	16.2
New York CSA	96	15,347	22.6	9,635	22.8	14.6	8.7	20.0	28.1	19.6	21.8	24.0	22.4	35.3	29.2	33.8	0.0	4.2	15.5
PA Non MSA	97	13,278	22.8	2,740	17.2	14.4	5.0	18.3	18.6	15.0	20.9	18.6	19.6	43.7	45.4	46.0	0.0	3.1	14.5
Total	425	65,086	100.0	26,476	21.4	11.5	8.4	18.1	20.9	19.2	20.9	22.6	21.6	39.5	40.0	35.0	0.0	4.9	15.8

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%

State of Pennsylvania

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Scranton MSA	528	55,751	56.7	11,665	2.8	1.3	2.3	19.4	12.9	17.1	51.2	53.0	52.3	24.6	30.7	26.4	2.1	2.1	2.0
New York CSA	219	12,561	23.5	5,619	0.0	0.0	0.0	26.7	23.7	22.6	69.3	73.5	71.3	4.0	2.7	4.8	0.0	0.0	1.4
PA Non MSA	184	10,132	19.8	1,724	0.0	0.0	0.0	14.5	3.3	9.3	74.9	90.2	78.7	10.6	6.5	10.7	0.0	0.0	1.3
Total	931	78,444	100.0	19,008	1.8	0.8	1.4	20.7	13.5	18.0	58.1	65.2	60.3	18.1	19.3	18.5	1.3	1.2	1.8

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Scranton MSA	90	11,653	48.6	--	4.8	1.1	--	24.2	26.7	--	43.1	44.4	--	27.6	27.8	--	0.3	0.0	--
New York CSA	46	3,297	24.9	--	0.3	0.0	--	22.1	58.7	--	65.1	39.1	--	12.0	2.2	--	0.5	0.0	--
PA Non MSA	49	3,321	26.5	--	0.0	0.0	--	4.4	2.0	--	82.4	79.6	--	13.2	18.4	--	0.0	0.0	--
Total	185	18,271	100.0	--	3.2	0.5	--	21.6	28.1	--	52.9	52.4	--	22.1	18.9	--	0.3	0.0	--

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

State of Pennsylvania

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
Scranton MSA	528	55,751	56.7	11,665	86.5	29.7	40.5	4.0	20.3	9.6	50.0
New York CSA	219	12,561	23.5	5,619	90.9	36.1	49.4	2.4	14.2	6.7	49.8
PA Non MSA	184	10,132	19.8	1,724	89.2	30.4	40.4	3.1	10.3	7.7	59.2
Total	931	78,444	100.0	19,008	87.8	31.4	43.2	3.5	16.9	8.7	51.8

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 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
Scranton MSA	90	11,653	48.6	--	88.3	63.3	--	3.3	30.0	8.3	6.7
New York CSA	46	3,297	24.9	--	92.3	60.9	--	1.9	39.1	5.8	0.0
PA Non-MSA	49	3,321	26.5	--	90.5	73.5	--	2.7	18.4	6.8	8.2
Total	185	18,271	100.0	--	89.5	65.4	--	2.9	29.2	7.5	5.4

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

State of Vermont

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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Burlington MSA	88	77,178	100.0	11,472	1.0	3.4	1.3	13.2	19.3	13.8	65.6	52.3	64.2	20.2	25.0	20.7	0.0	0.0	0.0	
Total	88	77,178	100.0	11,472	1.0	3.4	1.3	13.2	19.3	13.8	65.6	52.3	64.2	20.2	25.0	20.7	0.0	0.0	0.0	

*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	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Burlington MSA	48	45,971	100.0	6,749	1.1	6.3	1.4	14.8	14.6	16.4	67.1	52.1	64.5	16.8	27.1	17.4	0.2	0.0	0.3	
Total	48	45,971	100.0	6,749	1.1	6.3	1.4	14.8	14.6	16.4	67.1	52.1	64.5	16.8	27.1	17.4	0.2	0.0	0.3	

*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%*

State of Vermont

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
Burlington MSA	88	77,178	100.0	11,472	20.5	5.7	7.2	17.9	10.2	20.9	23.1	10.2	24.2	38.5	37.5	37.3	0.0	36.4	10.4		
Total	88	77,178	100.0	11,472	20.5	5.7	7.2	17.9	10.2	20.9	23.1	10.2	24.2	38.5	37.5	37.3	0.0	36.4	10.4		

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	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
Burlington MSA	48	45,971	100.0	6,749	19.8	2.1	9.5	17.7	6.3	22.7	23.5	16.7	25.3	39.0	39.6	34.5	0.0	35.4	8.1		
Total	48	45,971	100.0	6,749	19.8	2.1	9.5	17.7	6.3	22.7	23.5	16.7	25.3	39.0	39.6	34.5	0.0	35.4	8.1		

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%

State of Vermont

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	
Burlington MSA	263	50,477	100.0	5,696	0.9	0.0	1.1	23.5	21.7	22.2	53.9	41.1	52.9	21.6	37.3	22.9	0.2	0.0	0.9	
Total	263	50,477	100.0	5,696	0.9	0.0	1.1	23.5	21.7	22.2	53.9	41.1	52.9	21.6	37.3	22.9	0.2	0.0	0.9	

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	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	
Burlington MSA	67	18,659	100.0	--	1.7	0.0	--	17.2	7.5	--	50.8	76.1	--	29.2	16.4	--	1.2	0.0	--	
Total	67	18,659	100.0	--	1.7	0.0	--	17.2	7.5	--	50.8	76.1	--	29.2	16.4	--	1.2	0.0	--	

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

State of Vermont

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
Burlington MSA	263	50,477	100.0	5,696	88.6	31.6	43.2	4.0	41.1	7.4	27.4
Total	263	50,477	100.0	5,696	88.6	31.6	43.2	4.0	41.1	7.4	27.4

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 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
Burlington MSA	67	18,659	100.0	--	90.1	40.3	--	3.3	55.2	6.6	4.5
Total	67	18,659	100.0	--	90.1	40.3	--	3.3	55.2	6.6	4.5

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