



Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Trustco Bank
Charter Number 707635

1 Sarnowski Drive
Glenville, New York 12302

Office of the Comptroller of the Currency

343 Thornall Street, Suite 610, Edison, NJ 08837

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

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Overall CRA Rating

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

The following table indicates the performance level of Trustco Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
Needs to Improve			
Substantial Noncompliance			

* The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The bank's lending activity reflects adequate responsiveness to assessment area credit needs;
- The geographic distribution of home mortgage loans is adequate and distribution of small loans to businesses is good;
- The borrower distribution of home mortgage loans by income level of the borrower is adequate and distribution of small loans to businesses by income is poor;
- A substantial majority of home mortgage loans and small loans to businesses were made in the bank's assessment area;
- The bank provides a good level of community development services;
- The bank has an adequate level of qualified investments that were responsive to community needs;
- The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low-and moderate-income geographies and/or to low- and moderate-income individuals; and
- Services do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate- and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 One 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.

Description of Institution

Trustco Bank (Trustco or the bank) is a \$4.9 billion thrift headquartered in Glenville, New York. The bank conducts operations through branches located in the eastern part of New York State and central Florida with a limited presence in New Jersey, Massachusetts, and Vermont. The bank is principally a one- to-four family lender, but also offers multifamily loans, nonresidential mortgages, secured and unsecured commercial loans, and consumer loans. The institution is fully owned by Trustco Bank Corp. NY, a publicly traded company.

As of December 31, 2016, the bank operated 145 branches. During the review period, Trustco added seven branches to their network, with five branches in Florida (one in a moderate-income geography, two in middle-income geographies and two in upper-income geographies) and two in New York, both in middle-income geographies. The bank relocated three branches (one in Florida and two in New York) all within a very close proximity to the original location and consolidated one branch in New York located in a middle-income geography (the consolidated branch remained in a middle-income geography). Trustco operates 153 Automatic Teller Machines throughout the bank's market areas of Florida, Vermont, Massachusetts, New York, and New Jersey.

As of December 31, 2016, Trustco's loan portfolio totaled \$3.4 billion or 69.8 percent of total assets. Ninety-nine percent of the portfolio was held in real estate loans with the remaining \$26 million in commercial loans. 1-4 family residential mortgages comprise 94 percent or \$3.2 billion of the loan portfolio. The bank has \$425 million in Tier 1 capital.

The following are the five full scope rating areas: Albany-Schenectady-Troy, NY MSA 10580; New York-Wayne-White Plains, NY-NJ Metropolitan District 35614 located in the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area; Orlando-Kissimmee-Sanford County, FL MSA 36740; and Non-MSA Vermont- Bennington and Berkshire, MA MSA 38340. There are eleven limited scope AAs (see Scope of the Evaluation section of the PE for details).

Some of the bank's major competitors in the full scope areas include KeyBank, N.A., JPMorgan Chase, N.A., SunTrust Bank, Berkshire Bank, The Bank of Bennington, Bank of America, N.A, TD Bank, Citibank N.A and Wells Fargo Bank, N.A.

The institution offers a full line of loan products, deposits, and non-deposit services, but the bank primarily engages in residential mortgage lending funded through locally gathered deposits and borrowed funds. Loan products include fixed- and adjustable-rate one-to-four family loans for purchase, refinance, and construction. The bank also offers traditional commercial and consumer lending products.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. The bank received an overall Satisfactory rating in its previous CRA PE dated August 5, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, with the exception of Community Development Loans, is January 1, 2014 through December 31, 2016. Loan data between January 1, 2014 and December 31, 2016 is evaluated against 2010 census data. Lending market share data and statistics are based on 2015 Peer Mortgage Data.

Conclusions regarding the bank's lending performance are based on Home Mortgage Disclosure Act Loan Application Register (HMDA-LAR) reportable loans (home purchase, home improvement, and refinance loans) and small business loans from January 1, 2014 through December 31, 2016. Multi-family loans, which are also reported on the HMDA-LAR, were not evaluated as the volume was not significant.

For Community Development (CD) Loans, and the Investment and Service Tests, the evaluation period is from August 5, 2013 through June 12, 2017. The Investment Test included a review of investments, grants, and donations made in the bank's AAs that meet the definition of community development. Any qualified investments originated in prior periods and still outstanding at August 5, 2013 were given appropriate consideration. The Service Test included a review of retail and community development services provided in the bank's AAs.

Data Integrity

Prior to this evaluation, we tested the accuracy and reliability of the bank's HMDA and CRA small business data. Results of this testing evidenced the data is accurate and can be relied upon for this CRA evaluation.

Selection of Areas for Full-Scope Review

Full-scope reviews were performed for the following assessment areas: Albany-Schenectady-Troy, NY MSA 10580; New York-Wayne-White Plains, NY-NJ Metropolitan District 35614 located in the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area; Orlando-Kissimmee-Sanford County, FL MSA 36740; Non-MSA Vermont- Bennington and Berkshire, MA MSA 38340. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were selected.

We conducted limited scope reviews on the following AAs: Glens Falls, NY MSA 24020; Dutchess County-Putnam County, NY MD MSA 20524; Kingston, NY MSA 28740; Columbia County-Greene County-Montgomery County, non-MSA; Volusia, FL MSA 19660; Polk, FL MSA 29460; Manatee-Sarasota, FL MSA 35840; Brevard, FL MSA 37340; Charlotte County, FL MSA 389460; Hillsborough, FL MSA 43530; and Palm Beach, FL MSA 48424.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating and state ratings. The Multistate Metropolitan Area Rating and the State Ratings are based primarily on those areas that received full-scope reviews. The State of New York rating was more heavily weighted in arriving at the overall rating because that is where a majority of the bank's overall lending activities, deposits, and branches are located. Within the State of New York, the Albany-Schenectady-Troy MSA 10580 was rated the heaviest of the AAs. The Lending Test was rated more heavily than the Investment or Service Test. Within the Lending Test, home mortgages received a greater weight than small loans to businesses as home mortgages accounted for 93 percent of the number of originations in the AAs.

Within home mortgage lending, we placed more weight on home purchase and home refinance lending than home improvement lending. Home purchase lending accounted for 50 percent of all home mortgage originations and home refinance lending accounted for 41 percent of all home mortgage originations.

Discriminatory or Other Illegal Credit Practices Review

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

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

Multistate Metropolitan Area Rating

New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area

CRA rating for the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area¹: Satisfactory

The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Needs to Improve

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the community credit needs of the AA;
- A substantial majority of home mortgage loans and small loans to small businesses are originated within the bank's AA;
- The geographic distribution of loans reflects good penetration throughout the AA;
- The distribution of loans to borrowers reflects adequate distribution among customers of different income levels and business customers of different sizes; and
- The bank made a good level of qualified community development investments.

Description of Institution's Operations

Trustco has one AA within the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area, namely the New York-Wayne-White Plains, NY-NJ Metropolitan District 35614 (NY-W-WP AA) that meets the technical and regulatory definition of the regulation.

Trustco provides a full range of loan and deposit products and services through 16 full-service branches and Automated Teller Machines (ATMs) within the AA. During the evaluation period, 9.56 percent of bank-wide deposits and 5.62 percent of loans were originated in the New York-Wayne-White Plains, NY-NJ MD 35614. As of June 30, 2016, Trustco held \$397 million in deposits in the AA, which represented a 0.25 percent market share and ranked the bank 36 out of 88 depository financial institutions with operations in the AA. The largest depository institutions include Morgan Stanley, J.P. Morgan Chase, Bank of America, TD Bank, and Citi Bank.

Scope of Evaluation

We conducted a full-scope review of the New York-Wayne-White Plains, NY-NJ MD 35614 AA as all of the bank's Multistate Area branches, deposits, and loan originations are in this AA.

The community organization contact identified that the primary economic issues include the lack of affordable housing and lack of entry level employment with salaries commensurate with the cost of living.

¹This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Educating first-time home buyers and low- to moderate-income households on financial literacy was identified as need in the community. Additionally, the contact stated that there is more opportunity for banks to provide additional financial support and serve on Boards of non-profits with a mission to provide affordable housing and financial education.

LENDING TEST

The bank's performance under the lending test in the New York-Wayne-White Plains, NY-NJ MD 35614 is rated High Satisfactory. The overall geographic distribution of loans reflects good penetration to low- and moderate-income geographies. The overall borrower distribution reflects adequate penetration to borrowers of low- and moderate-income.

Lending Activity

Lending levels reflects good responsiveness to AA credit needs after taking into consideration the level of competition in the AA. Based on full-scope reviews, the bank's performance in the New York-Wayne-White Plains, NY-NJ MD 35614 is good. The institution exhibits a good record of serving the credit needs of the most economically disadvantaged area(s) of its assessment area. The borrower distribution of loans indicates Trustco exhibits an adequate record of serving low-income individuals and small businesses.

Trustco's market rank in home mortgage lending relative to the number of reporting lenders in the AA is equal to the bank's market rank in deposits. As of June 30, 2016, the bank held 0.25 percent market share of deposits and was ranked 36 out of 88 depository financial institutions in MD 35614. Trustco held a 0.24 percent market share for home mortgage loans overall and was ranked 74 out of 585 total reporting lenders. Trustco's market share for small business loans was 0.01 percent and was ranked 72 out of 160 total reporting lenders.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans reflects good penetration throughout the AA. The overall geographic distribution of home mortgage loans is good. The overall geographic distribution of small loans to businesses is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Multistate AA 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.

Home Purchase Lending

The geographic distribution of home purchase loans reflects good penetration throughout the AA. The percentage of home purchase loans in low-income geographies exceeds the percentage of aggregate peer lending levels in those geographies. The percentage of home purchase loans in moderate-income geographies is somewhat lower than the percentage of aggregate peer lending levels in those geographies. The percentage of home purchase loans in low-income geographies exceeds the percentage of owner-occupied units in those geographies. The percentage of home purchase loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in those geographies.

Home Improvement Lending

The geographic distribution of home improvement loans reflects good penetration throughout the AA. The bank did not originate any home improvement loans in low-income geographies. This performance is considered adequate when considering the low percentage of aggregate peer lending levels and the amount of owner-occupied units in low-income geographies. The percentage of home improvement loans in moderate-income geographies exceeds the percentage of aggregate peer lending levels in those geographies. The percentage of home improvement loans exceeds the percentage of owner-occupied units in those geographies.

Home Refinance Lending

The geographic distribution of home refinance loans reflects excellent penetration throughout the AA. The percentage of home refinance loans in low- and moderate-income geographies exceeds both the percentage of aggregate peer lending levels and the percentage of owner-occupied units in those geographies.

Small Loans to Businesses

Refer to Table 6 in the New York-Wayne-White Plains, NY-NJ Multistate MD section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchases of small loans to businesses.

The geographic distribution of small loans to businesses reflects adequate penetration throughout the AA. The bank did not originate any loans to small businesses in low-income geographies during the evaluation period. The percentage of small loans to businesses in moderate-income geographies exceeds both the percentage of aggregate peer lending levels and the percentage of businesses in those geographies.

Lending Gap Analysis

We evaluated the bank's geographic lending distribution in the bank's AAs to determine if any unexplained, conspicuous gaps existed. We used HMDA and CRA data reports to compare the geographies where loans were made to the geographies in the AAs. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

Inside/Outside Ratio

A majority of loans are made inside Trustco's AAs. Overall, 97.36 percent of the bank's loan originations fell within the AAs. For home mortgage loans, 97.80 percent of loan originations fell within the bank's AAs and for loans to small businesses, 89.41 percent fell within the bank's AAs.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans to borrowers of different income levels and businesses of different sizes in this AA reflects adequate penetration among borrowers of different income levels and among businesses of different sizes.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the New York-Wayne-White Plains, NY-NJ Multistate MD 35644 AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Lending

The borrower distribution of home purchase loans is adequate. The percentage of home purchase loans to low-income borrowers is somewhat lower than the percentage of aggregate peer lending levels to low-income borrowers. The percentage of home purchase loans to moderate-income borrowers is lower than the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of home purchase loans to low- and moderate-income borrowers is significantly lower than the percentage of low- and moderate-income families in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is very poor. The bank did not originate any home improvement loans to low- or moderate-income borrowers during the evaluation period.

Home Refinance Lending

The borrower distribution of home refinance lending is adequate. The bank did not originate any home refinance loans to low-income borrowers during the evaluation period. The percentage of home refinance loans to moderate-income borrowers exceeds the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of home refinance loans to moderate-income borrowers is significantly lower than the percentage of moderate-income families in the AA.

Small Loans to Businesses

Refer to Table 11 in the New York-Wayne-White Plains, NY-NJ Multistate MD 35644 AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses is somewhat lower than the percentage of small businesses throughout the AA.

Community Development Lending

Community development lending had a neutral impact on the lending test for the New York-Wayne-White Plains, NY-NJ Multistate MD 35614 AA. As indicated in Appendix D, Table 1, Lending Volume, Trustco made no qualified community development loans during the evaluation period.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the lending test conclusion for the state of New York. Trustco uses innovative and flexible lending practices in order to serve AA credit needs.

New York-Wayne-White Plains, NY-NJ MD 35614

Trustco uses innovative and/or flexible lending practices in order to serve assessment area credit needs. Product innovation and flexibility had a positive impact on the lending test conclusion for the New York-Wayne-White Plains, NY-NJ MD 35614. Trustco offers the following specialized home mortgage loan program:

- The Hometown First Time Home Buyer Program is a flexible home purchase program targeted to low- and moderate-income individuals. The program allows up to 95 percent financing, reduced application and closing fees, no appraisal fees, no points, and a potential rate discount for borrowers who set up automatic payments from a Trustco checking account. Trustco originated 164 loans during the review period totaling approximately \$27.5 million under the program.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the New York-Wayne-White Plains, NY-NJ MD 35614 MD is rated high satisfactory. Combined donations, grants and investments made during the current period in the AA total 11.10 percent of total qualified investments compared to 9.51 percent of total bank deposits in the AA.

Trustco has a good level of qualified investments and grants to meet the identified needs of the New York-Wayne-White Plains, NY-NJ MD 35614. The bank made 36 qualified donations and investments during the evaluation period totaling \$935.6 thousand. The bank made five investments that supported affordable housing for low- and moderate-income individuals totaling \$893 thousand and an additional 31 donations totaling \$42 thousand.

Highlights of investment activities include:

- A \$4,500 donation to a non-profit organization in Bergen County that builds houses for low-income individuals.
- A \$4,000 donation to a non-profit organization in Westchester County that provides housing opportunities to low- and moderate-income individuals.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the New York-Wayne-White Plains, NY-NJ Multistate MD 35614 AA is rated as Needs to Improve.

Retail Banking Services

Refer to Table 15 in the New York-Wayne-White Plains, NY-NJ Multistate MD section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Trustco's delivery systems are accessible to limited portions of the AA. Trustco operates 16 branches in the AA. The bank does not operate any branches in low- or moderate-income geographies within the AA. Of the 16 branches, 12 are in upper-income geographies and four are in middle-income geographies. The distribution of branches in both low- and moderate-income geographies is lower than the percentage of the population residing in such geographies. The bank does have four branches within close proximity of moderate-income census tracts that provide access to moderate-income individuals.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- or moderate-income individuals. The bank relocated one branch during the evaluation period in the AA. This did not have any impact as both locations were located in an upper-income geography.

Services do not vary in a way that inconveniences low- and moderate-income individuals. The bank offers a full range of credit and deposit services throughout its AA. Lending products include real estate loans, commercial loans as well as consumer loans. Deposit services provided by the bank include Savings, Checking and Money Market accounts. The bank also provides internet, mobile, and telephone banking services which help improve accessibility to all geographies within its AA.

Community Development Services (CD)

Trustco provided a limited level of community development services in the New York-Wayne-White Plains, NY-NJ MD 35614. They include:

- A bank branch manager provides expertise to local youth to develop skills for work-readiness, entrepreneurship, and financial literacy. The manager also participated in financial education at schools in low- and moderate-income areas.

State Rating

State of New York

CRA Rating for New York:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Trustco's lending levels in the State of New York reflect good responsiveness to the overall AA credit needs;
- The overall geographic distribution of loans reflects adequate penetration throughout the bank's AAs;
- The distribution of loans to borrowers reflects adequate distribution among different income levels;
- Trustco had an adequate level of qualified investments in New York;
- Delivery systems are accessible to essentially all portions of the institution's AAs; and
- The bank provides a good level of community development services in New York.

Description of Institution's Operations in New York

Trustco has delineated five AAs in New York that meet the technical and regulatory requirements as defined by the regulation. Refer to appendix A for details on AA composition.

Trustco provides a full range of loan and deposit products and services to its AAs through 72 full-service branches within the state of New York. During the evaluation period, 71.44 percent of bank-wide deposits and 62.89 percent of loans originated were from the state of New York. As of June 30, 2016, Trustco held deposits totaling \$3.34 billion in New York, which represented 0.22 percent market share and ranked the bank number 41 out of 212 financial institutions with operations in New York. The state's largest depository institutions are J.P. Morgan Chase, The Bank of New York Mellon, HSBC, Citi Bank, and Bank of America.

The most significant AA in the state, in terms of lending and deposits is the Albany-Schenectady-Troy, NY MSA 10580. The AA has 54 full-service branches and accounts for 88.27 percent of rated area deposits and 83.46 percent of rated area loans in the state of New York. The bank did not open or close any branches during the evaluation period. The bank consolidated two near-by banks into one during the evaluation period. Both branches were located in middle-income geographies. The bank relocated two branches in the AA during the evaluation period, both branches were originally in middle-income geographies and moved to nearby middle-income geographies.

The Glenn Falls, NY MSA 240420 has six full-service branches and accounts for 4.70 percent of deposits and 8.13 percent of rated area loans in the state of New York. The bank opened one full-service branch and Automated Teller Machine in the Glenn Falls AA during the evaluation period. The bank did not close any branches in the AA during the evaluation period.

The Kingston, NY MSA 28740 has two full-service branches and accounts for 0.31 percent of rated area deposits and 0.64 percent rated area loans in the state of New York. The bank did not open or close any branches in the Kingston AA during the evaluation period.

The Dutchess County, NY MSA 20524 has full-service branches and accounts for 2.11 percent of rated area deposits and 2.89 percent of rated area loans in the state of New York. The bank did not open or close any branches in the Dutchess AA during the evaluation period.

The Columbia-Greene-Montgomery County Non-MSA has six full-service branches and accounts for 4.61 percent of rated area deposits and 4.88 percent of rated area loans in the state of New York. The bank opened one branch in the AA during the evaluation period in a middle-income geography. The bank did not close any branches in the AA during the evaluation period.

Refer to the market profits for the state of New York in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New York

We selected the Albany-Schenectady-Troy, NY MSA 10580 for a full-scope review as the majority of the bank's branches, deposits, and loan originations in New York are within this AA. The Glen Falls MSA 24020, Kingston MSA 24740, Dutchess County MD 20524, and the Columbia, Greene, and Montgomery County Non-MSA AAs received limited-scope reviews based on overall deposit and loan activity. The ratings for the state of New York are primarily based on the results of the full-scope review, but were also influenced by performance in limited-scope reviews.

Refer to Table 1 in appendix A for additional information on overall lending and deposit activity.

The community organization contacted identified the following needs: credit score repair counseling, access to credit, first time homebuyer opportunities, community development, business development, housing counseling agencies, and debt reduction and savings strategies. Also identified was increased investment in the communities by providing funding and grants for acquisition and rehabilitation of vacant properties as well as affordable small business lending. Offering low interest rates and down payment assistance loans to first time homebuyers is also a need. There is also a need for institutional leadership and greater investment and engagement in the community from local banks. There is a need for financing for affordable housing rehab projects, affordable mortgage products, more investments in loan funds, and more philanthropic support for housing related programs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of New York is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Albany-Schenectady-Troy, NY MSA 10580 AA is adequate. Overall performance reflects the impact of performance in limited-scope AAs. The overall geographic distribution of loans is adequate. The overall borrower distribution of loans is adequate. The level of community development lending had a neutral impact on the overall Lending Test rating.

Lending Activity

Trustco's lending levels reflect a good responsiveness to the overall AA credit needs. Based on the full-scope review, the bank's performance in the Albany-Schenectady-Troy, NY MSA 10580 is good. The institution exhibits an adequate record of serving the credit needs of the most economically disadvantaged area(s) of its assessment areas. The borrower distribution of loans indicates Trustco exhibits an adequate record of serving low-income individuals and small businesses.

Albany-Schenectady-Troy, NY MSA 10580

Trustco's lending activity in the Albany-Schenectady-Troy, NY MSA 10580 reflects a good responsiveness to the credit needs of the AA. Trustco has 54 branches and 63.06 percent of the bank's total deposits in the AA. The bank has exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas in the AA. The borrower distribution of loans indicates Trustco exhibits a poor record of serving low-income individuals and small businesses.

Trustco's market rank in home mortgage lending relative to the number of reporting lenders in the AA is slightly lower than the bank's market rank in deposits. As of June 30, 2016, the bank held 10.45 percent market share of deposits and was ranked second out of 25 depository financial institutions in MSA 10580. Trustco held a 5.28 percent market share for home mortgage loans overall and was ranked fifth out of 271 total reporting lenders. Trustco's market share for small business loans is 0.82 percent and they rank 22 out of 82 reporting lenders.

Refer to Table 1 Lending Volume in the state of New York section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans reflects adequate penetration throughout the AA. The geographic distribution of home mortgage loans is poor, and the geographic distribution of small loans to businesses is excellent.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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/purchases.

Home Purchase Lending

The geographic distribution of home purchase loans reflects adequate penetration throughout the AA. The percentage of home purchase loans to low- and moderate-income geographies is somewhat lower than the percentage of aggregate peer lending levels in low- and moderate-income geographies. The percentage of low- and moderate-income geographies is lower than the percentage of owner-occupied units in low- and moderate-income geographies in the AA.

Home Improvement Lending

The geographic distribution of home improvement loans reflects poor penetration throughout the AA. The percentage of home purchase loans to low- and moderate-income geographies is lower than the percentage of aggregate peer lending levels in low- and moderate-income geographies. The percentage of low- and moderate-income geographies is lower than the percentage of owner-occupied units in low- and moderate-income geographies in the AA.

Home Refinance Lending

The geographic distribution of home refinance loans reflects poor penetration throughout the AA. The percentage of home refinance loans to low- and moderate-income geographies is lower than the percentage of aggregate peer lending levels in low- and moderate-income geographies. The percentage of low- and moderate-income geographies is lower than the percentage of owner-occupied units in low- and moderate-income geographies in the AA.

Small Loans to Businesses

Refer to Table 6 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 origination and purchases of small loans to businesses.

The geographic distribution of small loans to businesses reflects good penetration throughout the AA. The percentage of small loans to businesses in low- and moderate-income geographies exceeds the percentage of aggregate peer lending levels in those geographies.

Lending Gap Analysis

We evaluated the bank's geographic lending distribution in the bank's AAs to determine if any unexplained, conspicuous gaps existed. We used HMDA and CRA data reports to compare the geographies where loans were made to the geographies in the AAs. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of loans are made in Trustco's AAs. Overall, 97.36 percent of the bank's loan originations were their AAs. For home mortgage loans, 97.80 percent of loan originations were within the bank's AAs and for loans to small businesses, 89.41 percent were within the bank's AAs.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. The overall distribution of HMDA home mortgage loans to borrowers of different income levels is adequate. The overall distribution of loans to businesses of different sizes is poor.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Lending

The borrower distribution of home purchase loans is adequate. The percentage of home purchase loans to low- and moderate-income borrowers is lower than the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is adequate. The percentage of home improvement loans to low- and moderate-income borrowers is lower than the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA.

Home Refinance Lending

The borrower distribution of home refinance loans is adequate. The percentage of home refinance loans to low-income borrowers is lower than the percentage of aggregate peer lending levels to low-income borrowers. The percentage of home refinance loans to moderate-income borrowers is somewhat lower than the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

Small Loans to Businesses

Refer to Table 11 in the state of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is poor. The percentage of small loans to businesses is lower than the percentage of small businesses throughout the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the State of New York lending section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Albany-Schenectady-Troy, NY MSA 10580 AA

Trustco has made a low level of community development loans in the Albany-Schenectady-Troy MSA, which had a neutral impact on the Lending Test. The bank originated 12 community development loans during the review period totaling approximately \$5.84 million. The majority of loans originated supported affordable housing to low- and moderate-income individuals in low- and moderate-income geographies.

Highlights of CD lending activities include:

- Three loans totaling \$2.3 million to a developer in Albany, NY to finance the development of affordable multifamily housing units;
- \$1.5 million operational line of credit to a non-profit that provides services to individuals with developmental disabilities; and
- \$1.1 million loan to fund a multifamily development in Saratoga Springs, NY that provides affordable housing.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the lending test conclusion for the state of New York. Trustco uses innovative and flexible lending practices in order to serve AA credit needs.

Albany-Schenectady-Troy, NY MSA 10580

Trustco uses innovative and/or flexible lending practices in order to serve assessment area credit needs. Product innovation and flexibility had a positive impact on the lending test conclusion for the Albany-Schenectady-Troy MSA 10580. Trustco offers the following specialized home mortgage loan program:

- The Hometown First Time Home Buyer Program is a flexible home purchase program targeted to low- and moderate-income individuals. The program allows up to 95 percent financing, reduced application and closing fees, no appraisal fees, no points, and a potential rate discount for borrowers who set up automatic payments from a Trustco checking account. Trustco originated 164 loans during the review period totaling approximately \$27.5 million under the program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Glenn Falls, NY MSA 24020 and the Dutchess County, NY MD 20524 is generally not inconsistent with the bank's overall Low Satisfactory performance under the Lending Test in New York. In the Kingston, NY MSA 28740 the bank's performance is weaker than the overall performance in the state with regard to the geographic distribution of loans. The bank's performance in the Kingston, NY MSA 28740 had a negative impact on the overall Lending Test in NY, but did not change the overall Lending Test rating. In the Columbia, Greene, and Montgomery County Non-MSA, the bank's performance is stronger than the overall performance in the state with regard to the borrower distribution of loans. The bank's performance in the Columbia, Greene, and Montgomery County Non-MSA had a positive impact on the overall Lending test in NY, but did not change the overall Lending Test rating.

Refer to the Tables 1 through 13 in the state of New York section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in New York is rated Low Satisfactory. Trustco has an adequate level of qualified investments and grants to meet the identified needs of New York. The state rating considers performance in limited-scope AAs, which had a neutral impact on the overall Investment Test rating.

Refer to Table 14 in the state of New York section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

Albany-Schenectady-Troy, NY MSA 10580 AA

Trustco has an adequate level of qualified investments and grants and exhibits adequate responsiveness to meeting the identified needs of the Albany-Schenectady-Troy, NY MSA 10580 AA.

During the evaluation period, the bank made 188 investments totaling \$1.19 million. The bank made 185 grants and donations totaling \$810 thousand and three investments that supported affordable housing for low- and moderate-income individuals totaling \$380 thousand.

Highlights of investment activity include:

- A \$47 thousand donation to a non-profit organization that collects and distributes food for low-income families within the MSA.
- A \$40 thousand donation to a community loan fund serving Albany County to promote economic growth in low- and moderate-income tracts by providing economic assistance to small businesses.
- An \$18 thousand donation to a non-profit organization that provides housing counseling to low- and moderate-income families within the MSA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in three out of four limited-scope areas is not inconsistent with the bank's overall performance in New York. The bank's performance in the Kingston, NY MSA 28740 is weaker than the performance in the state as the bank did not make any investments during the evaluation period. Overall, performance in limited-scope areas had a neutral impact on the bank's overall "Low Satisfactory" rating under the Investment Test in New York.

Refer to Table 14 in the State of New York section of Appendix D for the facts and data to support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the State of New York is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Albany-Schenectady-Troy, NY MSA 10580 is High Satisfactory.

Retail Banking Services

Refer to Table 15 in the state of New York section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Albany-Schenectady-Troy, NY MSA 10580

Trustco's delivery systems are accessible to essentially all portions of the institution's assessment area. The bank operates 54 full service branches and 55 Automated Teller Machines in this AA, of which five are located in low-income geographies and five in moderate-income geographies. The distribution of branches in low-income geographies is near to the percentage of the population that reside in those geographies as well as the percentage of geographies that are low-income. The distribution of branches in moderate-income geographies is lower than the percentage of the population that reside in those geographies as well as the percentage of geographies that are moderate-income.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- or moderate-income individuals. During the evaluation period, Trustco did not open or close any branches within the AA. During the evaluation period, Trustco consolidated two near-

by branches. This did not have an impact on delivery systems as both branches were within 0.1 miles of each other and both located within a middle-income geography.

Services do not vary in a way that inconveniences low- and moderate-income individuals. The bank offers a full range of credit and deposit services throughout its AA's. Lending products include real estate loans, commercial loans, and consumer loans. Deposit services provided by the bank include Savings, Checking, and Money Market accounts. The bank also provides internet, mobile, and telephone banking services which help improve accessibility to all geographies within its AA.

Community Development Services

The bank provides an adequate level of community development services in the AA. Bank Officers have provided financial and technical expertise to several organizations that provide services to low- and moderate-income individuals within the AA. The bank's responsiveness to the community development needs of the area is adequate.

Highlights of Community Development Services include:

- A bank officer serves on the finance committee of the Board of an organization whose mission is to provide services to low- and moderate-income children facing adversity in Albany County.
- A bank Vice President serves on the Board of an organization that provides critical home repairs and home safety assessments for low-income homeowners with the goal of stabilizing communities.
- A bank Assistant Vice President serves on the Board of an organization that provides housing and services for homeless veterans.
- A bank branch manager serves on the Board of Directors of an organization whose mission is to fight hunger in Schenectady.
- A bank Executive Vice President serves on the Audit Committee of a Food Bank that services 23 counties in New York.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test is generally not inconsistent with the bank's overall performance in New York and had a neutral impact on the overall Service Test rating. The bank's performance in the Kingston, NY MSA 28740 and Dutchess County, NY MSA 20524 was not inconsistent with the bank's overall performance in New York. The distribution of branches in Kingston and Dutchess exceeded the percentage of the population residing in moderate-income geographies. The bank's performance in Glenn Falls, NY MSA 24020 and the Columbia, Greene, and Montgomery County Non-MSA was weaker than the performance in New York. The bank's level of community development services was weaker than the overall performance in New York for all limited-scope areas.

State Rating

State of Florida

CRA Rating for Florida²:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Trustco's lending levels in the State of Florida reflect adequate responsiveness to the overall AA credit needs;
- The overall geographic distribution of home mortgage loans reflects adequate penetration throughout the bank's AAs;
- The borrower distribution of home mortgage loans by income level of the borrower is poor;
- Trustco has a good level of qualified investments in Florida;
- Delivery systems are accessible to essentially all portions of the institution's AAs; and
- Overall, the bank provides an adequate level of community development services in Florida.

Description of Institution's Operations in Florida

Trustco has delineated nine AAs in Florida that meet the technical and regulatory requirements as defined by the regulation. Refer to appendix A for details on the AA composition.

Trustco provides a full range of loan and deposit products and services to its AAs through 51 full-service branches within the state of Florida. During the evaluation period, 18.42 percent of bank-wide deposits and 30.47 percent of loans originated were from the state of Florida. As of June 30, 2016, Trustco held deposits totaling \$766 million in Florida, which represented .014 percent market share and ranked the bank number 57 out of 241 financial institutions with operations in Florida. The state's largest depository institutions are Bank of America, Wells Fargo Bank and SunTrust Bank.

The most significant AA in the state, in terms of lending and deposits is the Orlando-Kissimmee-Sanford, FL MSA 36740. The AA has 35 full-service branches and accounts for 60.04 percent of rated area deposits and 49.59 percent of rated area loans in the state of Florida. The bank opened three branches during the evaluation period with ATMs and did not close any branches.

The other limited-scope AAs in Florida are the following: West Palm Beach-Boca Raton-Boynton Beach, FL MSA 48424 AA; Tampa-St. Petersburg-Clearwater, FL MSA 45300 AA; Port St. Lucie, FL MSA 38940 AA; Palm Bay-Melbourne-Titusville, FL MSA 37340; Punta Gorda, FL MSA 39460 AA; Deltona-Dayton

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Beach-Ormond Beach, FL MSA 19660 AA; Lakeland-Winter Haven, FL MSA 29460 AA and North Port-Bradenton-Sarasota, FL MSA 35840 AA. The limited-scope AAs have 16 full-service branches and accounts for 39.96 percent of deposits and 50.41 percent of rated area loans in the state of Florida. The bank opened one branch and ATM in the AAs during the evaluation period. The bank did not close any branches in the AA during the evaluation period.

Refer to the market profits for the state of Florida in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Florida

We selected the Orlando-Kissimmee-Sanford, FL MSA 36740 for a full-scope review as the majority of the bank's branches, deposits, and loan originations in Florida are within this AA. The West Palm Beach-Boca Raton-Boynton Beach, FL MSA 48424 AA; Tampa-St. Petersburg-Clearwater, FL MSA 45300 AA; Port St. Lucie, FL MSA 38940 AA; Palm Bay-Melbourne-Titusville, FL MSA 37340; Punta Gorda, FL MSA 39460 AA; Deltona-Dayton Beach-Ormond Beach, FL MSA 19660 AA; Lakeland-Winter Haven, FL MSA 29460 AA and North Port-Bradenton-Sarasota, FL MSA 35840 AA received limited-scope reviews based on overall deposit and loan activity. The ratings for the state of Florida are primarily based on the results of the full-scope review, but were also influenced by performance in limited-scope reviews.

Refer to Table 1 in appendix A for additional information on overall lending and deposit activity.

The community organization contacted has seen more rent burdened markets in the state of Florida relative to the rest of the US. When discussing the performance and opportunities of financial institutions, the contact stated that banks have done a decent job of trying to create cost sensitive programs, but noted that Florida is a state where predatory lending remains prevalent. Larger banks have programs that are receptive to the needs of the community, while smaller regional banks must be educated to show the importance of continuing to build relationships. Community credit needs identified include lending for affordable housing, including single family and multifamily loans to low- and moderate-income borrowers.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Florida is rated Low Satisfactory. Based on the full-scope reviews, the bank's performance in the Orlando-Kissimmee-Sanford, FL MSA 36740 AA is adequate. Overall performance reflects the impact of performance in limited-scope AAs. The overall geographic distribution of loans is adequate. The overall borrower distribution of loans is poor.

Lending Activity

Trustco's lending levels reflects a good responsiveness to the overall AA credit needs. Based on the full-scope review, the bank's performance in the Orlando-Kissimmee-Sanford, FL MSA 36740 is good. The institution exhibits an adequate record of serving the credit needs of the most economically disadvantaged area(s) of its assessment area. The borrower distribution of loans indicates Trustco exhibits an adequate record of serving low-income individuals and small businesses.

Refer to Table 1. Lending Volume in the State of Florida section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Orlando-Kissimmee-Sanford, FL MSA 36740

Trustco's lending activity in the Orlando-Kissimmee-Sanford, FL MSA 36740 is Low Satisfactory and the bank's lending levels reflect adequate responsiveness to the credit needs of the community.

Trustco has 35 branches in this AA and approximately 11.06 percent of the bank's total deposits were in this AA, as of June 30, 2016. According to the June 30, 2016 FDIC Summary of Deposit Market Share report, Trustco had a 1.03 percent deposit market share in the Orlando-Kissimmee-Sanford, FL MSA 36740, ranking it 15th among 46 FDIC-insured institutions. The MSA deposit market is highly concentrated with three institutions, holding 58.7 percent of the AA's deposit market share. Major competitors are SunTrust Bank, NA (ranked first with a 22.51 percent market share), Bank of America, NA (ranked second with a 21.10 percent market share), and Wells Fargo Bank, NA (ranked third with a 15.09 percent market share).

The 2015 Peer Mortgage data indicates Trustco is ranked 41st out of mortgage lenders in the AA with a market share of 0.54 percent by loan count and 0.60 percent by total dollar amount. These rankings are a good indicator of the bank's volume of HMDA loans in the area. Although the bank's market share in home mortgage lending is below the bank's deposit market share in this AA, Trustco's lending levels are adequate when considering the competition from larger regional and nationwide mortgage lenders. Wells Fargo Bank, NA, FBC Mortgage, and Quicken Loans have the first, second, and third largest home mortgage lending market share in the AA.

Based on the 2015 Peer Small Business Loan Data, Trustco ranked 71st out of 132 lenders in the AA with a market share of 0.01 percent. This performance needs improvement.

For the evaluation period using 2010 U.S. Census data, Trustco originated approximately 0.54 percent of all HMDA home mortgage loans and 0.01 percent of all small loans to businesses in this AA. In the state of Florida, 15.11 percent of total rated area loans were originated in this AA. Of the total loans originated in this AA, 99.1 percent were HMDA home mortgage loans. There were eleven small loans to businesses. Among HMDA home mortgage originations in this AA, 46.63 percent were home purchase loans, 8.99 percent were home improvement loans, 44.30 percent were home refinance loans, and 0.08 percent were multifamily loans.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans reflects adequate penetration throughout the full-scope AA. The overall geographic distribution of HMDA home mortgage loans is adequate. The overall geographic distribution of small loans to businesses is poor although there were only eleven loans originated within the period.

Orlando-Kissimmee-Sanford, FL MSA 36740

The overall geographic distribution of loans reflects adequate penetration throughout the AA. The geographic distribution of HMDA home mortgage loans is adequate, and the geographic distribution of small loans to businesses is poor.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's HMDA home mortgage loan originations/purchases.

Home Purchase Lending

The geographic distribution of home purchase loans reflects adequate penetration throughout the AA. The percentage of home purchase loans to low-income geographies is near to the percentage of aggregate peer lending levels in low-income geographies. The percentage of home purchase loans to moderate-income geographies is somewhat lower than the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of low-income geographies is somewhat lower than the percentage of owner-occupied units in low-income geographies and is lower than moderate-income geographies in the AA.

Home Improvement Lending

The geographic distribution for home improvement loans reflects poor penetration through the AA. The bank had a limited volume of home improvement lending during the evaluation period. While the bank did not originate home improvement loans to low-income borrowers, the aggregate peer lending levels originated was only 0.58 percent. The percentage of home improvement loans to moderate-income geographies is lower than the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of low-income geographies is lower than the percentage of owner-occupied units in low-income geographies and is significantly lower than moderate-income geographies in the AA.

Home Refinance Lending

The geographic distribution of home refinance loans reflects adequate penetration throughout the AA. The percentage of home refinance loans to low-income geographies is somewhat lower than the percentage of aggregate peer lending levels in low-income geographies. The percentage of home refinance loans to moderate-income geographies is somewhat lower than the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of low-income geographies is somewhat lower than the percentage of owner-occupied units in low-income geographies and is significantly lower than moderate-income geographies in the AA.

Small Loans to Businesses

Refer to Table 6 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchases of small loans to businesses.

The geographic distribution of small loans to businesses reflects poor penetration throughout the AA. The bank originated only eleven loans to small businesses in the AA and did not originate any loans in low- or moderate-income geographies during the evaluation period. The aggregate lenders originated 0.59 percent and 21.52 percent in low- and moderate-income geographies, respectively, compared to 0.65 percent and 23.46 percent of small businesses located in these geographies.

Lending Gap Analysis

We evaluated the bank's geographic lending distribution in the bank's AAs to determine if any unexplained, conspicuous gaps existed. We used HMDA and CRA data reports to compare the geographies where loans were made to the geographies in the AAs. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of loans are made in Trustco's AAs. Overall, 97.36 percent of the bank's loan originations were their AAs. For home mortgage loans, 97.80 percent of loan originations were within the bank's AAs and for loans to small businesses, 89.41 percent were within the bank's AAs.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans to borrowers reflects poor distribution among retail customers of different income levels and business customers of different size. The overall distribution of HMDA home mortgage loans to borrowers of different income levels is poor. The overall distribution of small loans to businesses of different sizes is excellent, although there were only eleven loans originated within the period.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Lending

The borrower distribution of home purchase loans is poor. The percentage of home purchase loans to low- and moderate-income borrowers is lower than the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is poor. The bank had a limited volume of home improvement lending during the evaluation period. The percentage of home improvement loans to low-income borrowers is significantly lower than the percentage of aggregate peer lending levels to low-income borrowers. The percentage of home improvement loans to moderate-income borrowers is near to the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is less than the percentage of moderate-income families in the AA.

Home Refinance Lending

The borrower distribution of home refinance loans is adequate. The percentage of home refinance loans to low and moderate-income borrowers is lower than the percentage of aggregate peer lending levels to low and moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA.

Small Loans to Businesses

Refer to Table 11 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is excellent. The percentage of small loans to businesses exceeds the percentage of small businesses throughout the AA.

Community Development Lending

Community development lending had a neutral impact on the lending test for the Orlando-Kissimmee-Sanford, FL MSA 36740 AA. As indicated in Appendix D, Table 1, Lending Volume, Trustco made no qualified community development loans during the evaluation period.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the lending test conclusion for the state of Florida. Trustco uses innovative and flexible lending practices in order to serve AA credit needs.

Orlando-Kissimmee-Sanford, FL MSA 36740

Trustco uses innovative and/or flexible lending practices in order to serve assessment area credit needs in the Orlando-Kissimmee-Sanford, FL MSA 36740 AA. Product innovation and flexibility had a positive impact on the lending test conclusion. Trustco offers the following specialized home mortgage loan program:

- The Hometown First Time Home Buyer Program is a flexible home purchase program targeted to low- and moderate-income individuals. The program allows up to 95 percent financing, reduced application and closing fees, no appraisal fees, no points, and a potential rate discount for borrowers who set up automatic payments from a Trustco checking account. Trustco originated 164 loans during the review period totaling approximately \$27.5 million under the program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the West Palm Beach-Boca Raton-Boynton Beach, FL MSA 48424 AA; Tampa-St. Petersburg-Clearwater, FL MSA 45300 AA and Port St. Lucie, FL MSA 38940 AA is generally not inconsistent with the bank's overall Low Satisfactory performance under the Lending Test in Florida. The bank's performance in the Palm Bay-Melbourne-Titusville, FL MSA 37340 had a positive impact on the overall Lending Test in Florida, but did not change the overall Lending Test rating. The bank's performance in the Punta Gorda, FL MSA 39460 AA; Deltona-Dayton Beach-Ormond Beach, FL MSA 19660 AA; Lakeland-Winter Haven, FL MSA 29460 AA and North Port-Bradenton-Sarasota, FL MSA 35840 AA had a negative impact on the overall Lending Test in Florida, but did not change the overall Lending Test rating.

Refer to the Tables 1 through 13 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated High Satisfactory. Trustco has a good level of qualified investments and grants to meet the identified needs of Florida. The state rating considers performance in limited-scope AAs, which had a neutral impact on the overall Investment Test rating.

Refer to Table 14 in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews**Orlando-Kissimmee-Sanford, FL MSA 36740**

Trustco has a good level of qualified investments and grants and exhibits good responsiveness to meeting the identified needs of the Orlando-Kissimmee-Sanford, FL MSA 36740 AA.

Combined donations and investments made during the prior and current periods in the AA total 16.26 percent of total qualified investments compared to 11.01 percent of total bank deposits in the AA.

During the evaluation period, the bank made 23 investments, grants and donations totaling \$1.37 million. The bank made nine investments that supported affordable housing for low- and moderate-income individuals totaling \$1.35 million and an additional 14 donations totaling \$20 thousand.

Highlights of investment activity include:

- A \$3,000 donation to a non-profit organization that provides affordable housing opportunities to low- and moderate-income families.
- A \$3,000 donation to a non-profit organization that provides professional expertise in assisting on affordable housing opportunities.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Florida is rated as High Satisfactory. Based on a full-scope review, the bank's performance in the Orlando-Kissimmee-Sanford, FL MSA 36740 AA is High Satisfactory.

Retail Banking Services

Refer to Table 15 in the state of Florida section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Orlando – Kissimmee – Sanford, FL MSA 36740

Trustco's delivery systems are reasonably accessible to essentially all portions of geographies and individuals of different income levels in this AA. Trustco operates 35 of its 144 branches in this AA. Of these 35 branches, none were in a low-income geography, five were in a moderate-income geography, 14 were located in a middle-income geography, and 16 were located in a upper-income geography.

The distribution of branches in low- and moderate-income geographies is lower than the percentage residing in such geographies. There are no branches in low-income geographies where 1.09 percent of the population resides. The bank has five branches, or 14.29 percent of the total branches in this AA, in moderate-income geographies. This compares to 26.67 percent of the population residing in moderate-income geographies.

Trustco's services do not vary in a way that inconveniences certain portions of the AA. Retail services are offered equally at every branch. Services consist of traditional retail products such checking, savings, and Certificate of Deposit accounts. Hours are uniform among all branches in this AA. Thirty-four of the thirty-five branches offer drive-up service and all branches offer 24-hour ATM access.

During the evaluation period, Trustco opened three new branches in this AA. Two of the branches are located in upper-income geographies. One of the branches is located in a middle-income geography. Trustco offers alternate delivery systems such as mobile banking and online banking.

Community Development Services

Trustco's performance in providing community development services is adequate in the Orlando-Kissimmee-Sanford, FL MSA 36740.

Orlando-Kissimmee-Sanford, FL MSA 36740

Trustco provides a good level of CD services within the AA. Bank management and employees participated in organizations that promote housing, social, and economic development. These community development services are relatively responsive to community development needs in the AA. The following highlights the major services provided:

- A bank officer is a Board member for an organization that works with local youth to develop skills for work-readiness, entrepreneurship and financial literacy.

- A branch manager volunteered for an organization that provides affordable housing to low- and moderate-income families.
- A bank manager organized a food pantry for an organization that provides services for low- and moderate-income families.

Berkshire, MA Area Rating

Berkshire, MA MSA 38340

CRA Rating for Berkshire, MA:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Lending levels in the Berkshire, MA reflect adequate responsiveness to the community credit needs in the AA;
- The distribution of loans to borrowers reflects adequate distribution among customers of different income levels
- The geographic distribution of loans reflects poor penetration throughout the AA;
- Trustco had an adequate level of qualified investments in Berkshire, MA; and
- Delivery systems are reasonably accessible to essentially all portions of the institution's AA.

Description of Institution's Operations in the Berkshire, MA MSA 38340.

Trustco has one AA within in the state of Massachusetts, Berkshire MSA 38340.

Scope of Evaluation in the Berkshire, MA MSA 38340

We conducted a full-scope review of the Berkshire, MA MSA 38340, which is the bank's only AA within the state of Massachusetts. There are four branches in this AA, representing 0.82 percent of the bank's deposits, 0.62 percent of the bank's home mortgage lending.

The community organization we contacted indicated that banks serving the market area are receptive to providing volunteer assistance on servicing projects. More effort needs to be done by banks on providing affordable housing lending in the area and opportunities exist to work with community groups to bridge the gap.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's lending performance in the Berkshire, MA MSA 38340 is rated Low Satisfactory.

Lending Activity

Trustco's lending levels reflects adequate responsiveness to the overall AA credit needs. Based on the full-scope review, the bank's performance in the Berkshire, MA MSA 38340 is adequate. The institution exhibits an adequate record of serving the credit needs of the most economically disadvantaged area(s)

of its assessment area. The borrower distribution of loans indicates Trustco exhibits an adequate record of serving low-income individuals.

Refer to Table 1. Lending Volume in the Berkshire, MA MSA 38340 section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans reflects poor penetration throughout the full-scope AA.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Berkshire, MA MSA 38340 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.

Home Purchase Lending

The geographic distribution of home purchase loans reflects good penetration throughout the AA. For the evaluation period, the bank did not originate any home purchase loans in low-income geographies, which is lower than the percentage of aggregate peer lending levels of 0.46 percent in low-income geographies. The percentage of home purchase loans to moderate-income geographies significantly exceeds the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of low-income geographies is lower than the percentage of owner-occupied units in low-income geographies and the percentage of moderate income geographies exceeds the percentage moderate-income geographies in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is poor. The bank had a limited volume of home improvement lending (eight loans) during the evaluation period. None of the loans granted were in low- or moderate-income geographies.

Home Refinance Lending

The borrower distribution of home refinance loans is poor. None of the 26 loans granted were in low- or moderate-income geographies.

Small Loans to Businesses

The bank did not originate any small loans to businesses in the AA during the evaluation period.

Lending Gap Analysis

We evaluated the bank's geographic lending distribution in the bank's AA to determine if any unexplained, conspicuous gaps existed. We used HMDA and CRA data reports to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of loans are made in Trustco's AAs. Overall, 97.36 percent of the bank's loan originations were in their AAs. For home mortgage loans, 97.80 percent of loan originations were within the bank's AAs and for loans to small businesses, 89.41 percent were within the bank's AAs.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans to borrowers reflects adequate distribution among retail customers of different income levels and business customers of different size. The overall distribution of HMDA home mortgage loans to borrowers of different income levels is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Berkshire, MA MSA 38340 AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Lending

The borrower distribution of home purchase loans is good. The percentage of home purchase loans to low-income borrowers is lower than the percentage of aggregate peer lending levels to low-income borrowers. The percentage of loans to moderate-income borrowers exceeds the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is adequate. The bank had a limited volume of home improvement lending during the evaluation period. The bank did not make any home improvement loans to low-income borrowers. The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

Home Refinance Lending

The borrower distribution of home refinance loans is adequate. The bank did not make any home improvement loans to low-income borrowers. The percentage of home refinance loans to moderate-income borrowers exceeds the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

Small Loans to Businesses

The bank did not originate any small loans to businesses in the AA during the evaluation period.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Berkshire, MA is rated Low Satisfactory. Trustco has an adequate level of qualified investments and grants to meet the identified needs of the AA.

Refer to Table 14 in the Berkshire, MA MSA 38340 section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Qualified investments, including grants and donations originated during the evaluation period totaled \$7,749.

The grants, donations, and charitable contributions originated during the period include the following:

- Trustco donated \$3,000 to an organization which provides affordable houses for low-income and moderate-income individuals in the AA.
- Trustco donated \$3,750 to an organization which provides programs and services to homeless veterans, including transitional and emergency housing.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the Berkshire, MA MSA 38340 is rated Low Satisfactory.

Retail Banking Services

Refer to Table 15 in the Berkshire, MA MSA 38340 section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Trustco's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Berkshire MA MSA AA. Trustco operates 4 of its 145 branches in this AA. Of these four branches, none were in a low-income geography, none were in a moderate-income geography, three were located in a middle-income geography, and one was located in an upper-income geography. The distribution of branches in low- and moderate-income geographies is lower than the percentage of the population residing in such geographies.

Trustco's services do not vary in a way that inconveniences certain portions of the AA. Retail services are offered equally at every branch. Services consist of traditional retail products such checking, savings, and certificate of deposit accounts. Hours are uniform among all branches in this AA. Three out of the four branches offer drive-through service. All branches offer 24-hour ATM access. The bank offers alternate delivery systems such as mobile banking and online banking.

Community Development Services (CD)

Trustco provides a limited level of CD services within the Berkshire AA. Bank employees participated in organizations that promote housing and social development. These community development services are relatively responsive to community development needs in the AA. The following highlights the major services provided:

- A bank branch Manager serves as a Board of Directors Member for an organization that helps build homes for those in need.

Non-MSA Vermont Area Rating

Bennington County: Non-MSA (Vermont)

CRA Rating for Non-MSA Vermont Bennington: 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:

- Lending levels in the Non-MSA Vermont Bennington reflect good responsiveness to the community credit needs in the AA;
- The distribution of loans to borrowers reflects good distribution among customers of different income levels;
- The geographic distribution of loans reflects excellent penetration throughout the AA;
- Trustco had an good level of qualified investments in the Non-MSA Vermont Bennington; and
- Delivery systems are accessible to essentially all portions of the institution's AA.

Description of Institution's Operations in the Non-MSA Vermont-Bennington.

Trustco has one AA within in the state of Vermont.

Scope of Evaluation in the Non-MSA Vermont-Bennington

We conducted a full-scope review of the Non-MSA Vermont-Bennington. There is one branch in this AA, representing 0.25 percent of the bank's deposits and 0.39 percent of the bank's lending.

The community organization contacted stated that the local economy remains relatively challenged and that social programs for low- and moderate-income individuals are a great need in the community. The contact stated that there is a high level of poverty in the local area, which makes quality affordable housing also a great need in the area for low- and moderate-income individuals. Banks could do more with creating financing options catered not only towards low-income families, but also towards the local workforce that may not have sufficient funds to meet high down payment requirements. The contact also mentioned that lending to small businesses would also help attract and grow new businesses within the local community. The contact indicated that the local financial institutions are supportive of the credit and community development activities and do a very good job at meeting the needs of the community.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on the full-scope review, the bank's lending test performance in the Non-MSA Vermont-Bennington AA is good.

Refer to Table 1 Lending Volume in the Non-MSA Vermont-Bennington AA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans reflects excellent penetration throughout the full-scope AA. There were no aggregate peer lending levels in low-income geographies and no owner-occupied housing units in low-income geographies.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Non-MSA Vermont-Bennington 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.

Home Purchase Lending

The geographic distribution of home purchase loans reflects excellent penetration throughout the AA. The percentage of home purchase loans to moderate-income geographies exceeds the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of loans to moderate-income geographies is near to the percentage of owner-occupied units in moderate-income geographies in the AA.

Home Improvement Lending

The bank only originated two home improvement loans in the AA and none to low- or moderate-income geographies in the AA.

Home Refinance Lending

The geographic distribution of home refinance loans reflects excellent penetration through the AA. The percentage of home refinance loans in moderate-income geographies significantly exceeds the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of loans in moderate-income geographies significantly exceeds the percentage of moderate-income geographies in the AA.

Small Loans to Businesses

The bank originated only one small loan to a business in the AA and none in a low- or moderate-income geography.

Lending Gap Analysis

We evaluated the bank's geographic lending distribution in the bank's AA to determine if any unexplained, conspicuous gaps existed. We used HMDA and CRA data reports to compare the geographies where loans were made to the geographies in the AA. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of loans are made in Trustco's AA. Overall, 97.36 percent of the bank's loan originations were within their AA. For home mortgage loans, 97.80 percent of loan originations were within the bank's AA and for loans to small businesses, 89.41 percent were within the bank's AA.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans to borrowers reflects good distribution among retail customers of different income levels and business customers of different sizes.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Non-MSA Vermont- Bennington section of Appendix D for the facts and data used to evaluation the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Lending

The borrower distribution of home purchase loans is adequate. The bank made no home purchase loans to low-income borrowers, while the aggregate had loans to low-income borrowers of 3.68 percent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

Home Improvement Lending

Trustco only originated two home improvement loans in the AA and none to low- or moderate-income borrowers in the AA.

Home Refinance Lending

The borrower distribution of home refinance loans is excellent. The percentage of home refinance loans to low- and moderate-income borrowers exceeds the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA.

Small Loans to Businesses

Trustco made one small loan to businesses in the AA period to a business with revenue of less than \$1 million.

INVESTMENT TEST

The bank's performance under the Investment Test in the Non-MSA Vermont-Bennington is rated High Satisfactory. The bank exhibits good responsiveness to meeting the identified needs of the AA.

Refer to Table 14 in the Non-MSA Vermont-Bennington AA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Combined donations and investments made during the current period in the AA total 2.3 percent of total qualified investments compared to 0.25 percent of total bank deposits in the AA.

Out of eight total investments, two were mortgage-backed securities totaling \$189,813.

Qualified investments originated during the evaluation period included:

- Trustco donated \$1,000 to a facility that offers long-term care to individuals and is certified to provide care under Medicare and Medicaid programs in a moderate-income area.
- Trustco donated a total of \$3,000 to a Certified Community Development Financial Institution that provides loans for affordable housing development, community facilities, small businesses, agriculture or agri-tourism enterprises, and child care facilities.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the Non-MSA Vermont-Bennington is rated Low Satisfactory.

Refer to Table 15 in the Non-MSA Vermont-Bennington AA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Trustco's delivery systems provide reasonable access to geographies and individuals of different income levels in the non-MSA Vermont-Bennington AA. The bank operates only one branch in the AA and is located in a moderate-income geography.

Trustco's services do not vary in a way that inconveniences certain portions of the AA. Services consist of traditional retail products such checking, savings, and certificate of deposit accounts. The bank offers alternate delivery systems such as mobile banking and online banking.

Community Development Services (CD)

There was no evidence of participation in organizations that promote housing, social, and economic development in the AA.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/14 to 12/31/16) Investment and Service Tests and CD Loans: (08/05/13 to 06/12/17)	
Financial Institution	Products Reviewed	
Trustco Bank (Trustco) Glenville, New York	Home mortgage loans, small loans to businesses, CD loans, investments, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
New York-Wayne-White Plains, NY-NJ MD 35614 Albany-Schenectady-Troy MSA 10580 Orlando-Kissimmee-Sanford, FL MSA 36740 Berkshire, MA MSA 38340 Non-MSA Vermont- Bennington Glens Falls MSA 24020 Kingston MSA 28740 Dutchess County-Putnam County NY MD 20524 NY Non MSA Columbia County, Greene County and Montgomery County , Deltona-Dayton Beach Ormond Beach FL MS 19660 Lakeland-Winter Haven FL MSA 29460, North Port-Bradenton-Sarasota, FL MSA 35840 Palm Bay-Melbourne-Titusville, FL MSA 37340 Punta Gordo FL MSA 39460 Tampa-St Petersburg-Clearwater, FL MSA 43530 West Palm Beach- Boca Raton-Boynton Beach, FL MD 48424	Full Scope Full Scope Full Scope Full Scope Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS: Trustco Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Trustco Bank	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
NY-NJ MD	High Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
NEW YORK	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
FLORIDA	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MASSACHUSETTS	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
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: Community Profiles for Full-Scope Areas

State of New York and New Jersey

New York-Wayne-White Plains, NY-NJ Metropolitan District 35614

Demographic Information for Full Scope Area: Trustco Bank – New York –Wayne-White Plains, NY-NJ MD -35614 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	546	2.56	9.89	22.89	63.55	1.10
Population by Geography	2,538,729	2.44	9.76	22.23	65.33	0.24
Owner-Occupied Housing by Geography	599,938	0.48	3.86	17.61	78.05	0.00
Business by Geography	191,061	1.82	9.83	19.88	68.44	0.03
Farms by Geography	4,059	0.37	6.04	17.44	76.15	0.00
Family Distribution by Income Level	639,042	13.92	11.73	15.72	58.63	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	163,915	5.32	19.35	31.12	44.21	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		68,006 72,600 8%	Median Housing Value Unemployment Rate		478,763 4.2%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco’s Multistate New York-New Jersey AA is a portion of the New York-Wayne-White Plains, NY-NJ Metropolitan District (#35614), which is a subset of the larger New York-Newark-Edison, NY-NJ-PA MSA 35620. The New York-Wayne-White Plains, NY-NJ MD includes Bergen County, NJ; Hudson County, NY; Passaic, NJ; Bronx County, NY; Kings County, NY; New York County, NY; Putnam County, NY; Queens County, NY; Richmond County, NY; and Westchester County, NY. Trustco designated all of Rockland County; Westchester County; and Bergen County, NJ as the areas the bank could reasonably service as its AA.

As presented above, the AA is comprised of 546 census tracts. The AA census tracts are spread among 14 low income (2.56 percent), 54 moderate-income (9.89 percent), 125 middle-income (22.89 percent), 347 upper-income (63.55 percent), and 6 NA (1.10 percent) listed as unknown by the 2010 US Census Bureau. Total population within the assessment is 2,538,729. The 2016 median family income is \$68,006 and the adjusted median family income for 2016 is \$72,600. Approximately 8 percent of households live below the poverty level. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The 2010 U.S. Census data reported there are 599,938 owner-occupied housing units in the AA. Of all owner-occupied housing, 0.48 percent is located in low-income geographies, 3.86 percent is located in moderate-income geographies, 17.61 percent is located in middle-income geographies, and 78.05 percent is located in upper-income geographies. Based on the housing value and the 2016 FFIEC Adjusted Median Family Income, there is a lack of affordability for a low-income individual or family to purchase a home. According to the above, the average median housing value is \$478,763 and a low-income individual or family earns less than \$36,293.

The New York-White Plains-Wayne, NY-NJ AA banking market is highly competitive. The deposit market is dominated by large multi-national institutions. In this area, Trustco's major competitors include Morgan Stanley Private Bank, (N.A.), JPMorgan Chase, National Association (N.A.); Bank of America, National Association, TD Bank, Citibank National Association, Sterling National Bank, Wells Fargo Bank, National Association and Capital One, National Association. According to June 2016 FDIC Summary of Deposit Market Share report, Trustco's deposit market share was 0.25 percent, which makes the Bank the 36th largest institution in the area (out of 88).

Based on data from the US Bureau of Labor Statistics, the December 2016 unemployment rate for the New York-White Plains-Wayne, NY-NJ AA was 4.2 percent, compared to the national rate of 4.7 percent. The primary industries in the New York-White Plains-Wayne, NY-NJ AA continue to be colleges and universities, hospitals, state and local government, construction, and professional and business services. Several of the top employers in the area are Northwell Health, JP Morgan Chase & Co., Mount Sinai Medical, Macy's, and Citibank NA.

New York-Jersey City-White Plains NY-NJ AA is slowing down. Job growth fell behind that of the U.S. in the first quarter, just the second time that has happened in a decade. This was driven by soft blue-collar employment, with construction slowing and manufacturing shedding jobs on a year-ago basis. The former owes largely to slower homebuilding following a 2015 surge. Healthcare, however, remains sturdy, accounting for about two in five net new jobs over the past year, more than twice the national figure. The unemployment rate is at an all-time low, compelling more workers to re-enter the labor force. This, in turn, has prevented more impressive earnings gains.

Moody's Analytics reports the strength of the White Plains-Wayne, NY-NJ AA is the financial capital of the world, strong international immigration, high per capita income, and limited exposure to manufacturing. However, among the area's weaknesses are high business costs, especially high office rents and energy, costly housing and high tax burdens, and overreliance on wealthy overseas buyers to support real estate. Sluggish growth in office-using employment will hurt incomes and combine with weak demographics to keep a cap on construction. The AA will remain a positive for young workers and residents, but its higher cost will impede growth.

State of New York

Albany-Schenectady-Troy, NY MSA 10580

Demographic Information for Full Scope Area: Trustco Bank MSA - 10580 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	218	11.01	16.51	50.00	21.56	0.92
Population by Geography	870,716	9.63	14.16	50.96	24.89	0.37
Owner-Occupied Housing by Geography	229,151	4.37	11.32	56.55	27.76	0.00
Business by Geography	49,713	7.50	15.55	50.41	26.50	0.03
Farms by Geography	1,549	1.94	10.39	64.95	22.72	0.00
Family Distribution by Income Level	213,800	20.53	18.05	21.80	39.62	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	82,480	15.02	20.96	49.39	14.64	0.00
Median Family Income		74,739	Median Housing Value		186,839	
FFIEC Adjusted Median Family Income for 2016		82,000	Unemployment Rate		3.9%	
Households Below Poverty Level		10%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

As presented above, Trustco's designated AA is comprised of the five contiguous counties within the Albany-Schenectady-Troy MSA 10580. This includes the entire counties of Albany, Rensselaer, Saratoga, Schenectady, and Schoharie. The Albany-Schenectady-Troy, NY MSA 10580 is comprised of 218 census tracts. The AA census tracts are spread among 24 low-income (11.01 percent), 36 moderate-income (16.51 percent), 109 middle-income (50.00 percent), 47 upper-income (21.56 percent), and two (0.92 percent) listed as unknown by the 2010 U.S. Census Bureau. The AA meets the requirement of the regulation and does not arbitrarily exclude low-or moderate income geographies.

According to the 2010 U.S. Census Data the total population within the assessment is 870,716. The assessment area consists of 213,800 families of which 20.53 percent are low-income, 18.05 percent are moderate-income, 21.80 percent are middle-income, 39.62 percent are upper-income and zero percent listed as unknown. The 2010 median family income is 74,739 and the 2016 FFIEC adjusted median family income for 2016 is 82,000. In the AA, 10 percent of household live below the poverty level.

The 2010 U.S. Census Data reported 229,151 owner-occupied housing units in the AA. Of all owner-occupied housing, 4.37 percent is located in low-income geographies, 11.32 percent is located in moderate-income geographies, 56.55 percent located in middle-income geographies, 26.50 percent located in upper-income geographies, and zero percent located in unknown geographies. The median housing value is \$186,839. According to the above, a low-income individual or household in the assessment area would make under \$40,992 annually.

According to the June 30, 2016 FDIC summary of deposit Market Share report, Trustco ranked second out of 25 institutions in the AA with 10.4 percent market share. In this area, Trustco Bank's primary competitor is KeyBank National Association with a 32.5 percent market share.

Based on data from the US Bureau of Labor Statistics, the December 2016 unemployment rate for the Albany-Schenectady-Troy, NY MSA was 3.9 percent, compared to the national rate of 4.7 percent. The primary industry sectors in Albany-Schenectady-Troy, NY are state and local government, hospitals, colleges, and universities, management of companies and enterprises, and grocery stores. The largest employers are St. Peter's Heath Partners, General Electric Energy, Albany Medical Center, and Golub Corporation.

A more complete count of jobs from the Quarterly Census of Employment and Wages indicates that losses during the first half of 2016 for Albany-Schenectady-Troy, NY will become gains following benchmark revisions. Among the most undercounted is employment in professional services and information, indicating that technology is stronger than it appears. Consumer industries have recently backtracked. The housing market is also failing to gain traction, with permits down from a year ago and annual house price growth lagging that of the state.

Based on Moody's analytics, the Albany-Schenectady-Troy, NY AA strengths consists of strong technical skills from graduates of local universities with global semiconductor production hub and foundries combining with affordable house prices. However, among the area's weaknesses are weak population growth and migration trends, elevated reliance on state government, and persistent foreclosure problem. Moody's Analytics believe that the concerns about slippage in Albany-Schenectady-Troy will recede in short order. Job gains in 2016 will be revised higher, and the increase will be sustained. With state government performing well and private sector anchors investing further, Albany will outperform the state. Longer term, an overreliance on manufacturing and the public sector will prevent more robust gains.

State of Florida

Orlando-Kissimmee-Sanford, FL MSA 36740

Demographic Information for Full Scope Area: Orlando-Kissimmee-Sanford, FL MSA - 36740 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	389	2.06	27.25	39.33	31.11	0.26
Population by Geography	2,134,411	1.09	26.67	41.33	30.90	0.01
Owner-Occupied Housing by Geography	505,982	0.48	20.03	43.77	35.71	0.01
Business by Geography	236,735	0.65	23.46	38.50	37.38	0.01
Farms by Geography	5,948	0.64	19.70	46.49	33.09	0.08
Family Distribution by Income Level	521,311	20.08	18.64	20.77	40.51	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	201,865	1.82	39.02	42.17	16.98	0.01
Median Family Income		58,474	Median Housing Value		224,608	
FFIEC Adjusted Median Family Income for 2016		57,800	Unemployment Rate		4.3%	
Households Below Poverty Level		12%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

The Orlando-Kissimmee-Sanford FL MSA 36740 AA, is comprised of four contiguous counties including Lake County, Orange County, Osceola County, and Seminole County. The AA is comprised of 389 census tracts, of which eight (2.06 percent) are low-income, 106 (27.25 percent) moderate-income, 153 (39.33 percent are middle-income), 121 (31.11 percent are upper-income) and one NA tract. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

According to the 2010 U.S. Census data, the AA had a total population of 2,134,411. The AA contains 521,311 families and 20.08 percent are low income, 18.64 percent are moderate-income, 20.77 percent are middle-income, and 40.51 percent are upper-income. The median family income was \$58,474 and the 2016 FFIEC adjusted median family income is \$57,800. Twelve percent of households are below the poverty level.

The 2010 U.S. Census data reported 505,982 owner-occupied housing units in the AA. Approximately 0.48 percent of households are located in low-income geographies, 20.03 percent are in moderate-income geographies, 43.77 percent are located in middle-income geographies, and 35.71 percent are located in upper-income geographies.

The Orlando-Kissimmee-Sanford AA banking market is highly competitive. The deposit market is dominated by large multi-national institutions. In this area, Trustco's major competitors include SunTrust Bank (22.51 percent of deposit market share), Bank of America (21.10 percent of deposit market share), and Wells Fargo Bank (15.09 percent of deposit market share). According to the June 30, 2016 FDIC Summary of Deposit Market Share report, Trustco was ranked 15 out of 46 institutions (1.03 percent of deposit market share).

Based on data from the US Bureau of Labor Statistics, the December 2016 unemployment rate for the Orlando-Kissimmee-Sanford MSA was 4.3 percent, which is below the national rate of 4.7 percent. The primary industry sectors in this AA are state and local government, restaurants, amusement parks and arcades, and traveler accommodations. The largest employers are Walt Disney World, Co., Universal Orlando (Comcast), Adventist Health System/Florida Hospital, Publix Supermarkets, and Orlando International Airport.

The flourishing economy in Orlando-Kissimmee-Sanford has started to decline. After falling through the first three quarters of 2016, the unemployment rate began climbing in the final quarter of last year and has now returned to year-ago levels, though it remains below the statewide and national marks. This AA is sensitive to national and international economic conditions. Average wages have fallen in seven of the last 12 months. The AA contains ample land for development, house price gains over the last year have been healthy, however values remain 25 percent below their pre-recession peak, thus, and high foreclosures remain an issue.

Based on Moody's analytics, the Orlando-Kissimmee-Sanford MSA strengths consist of natural and historical advantages for tourism, strong demographics due to ample job opportunities in services, and plentiful land for development. On the other hand, the AA's weaknesses are sensitive to national and international economic conditions, higher foreclosures and low employment diversity, high volatility. Current employment trends point to construction and other services in the Orlando-Kissimmee-Sanford FL MSA. In 2015, The Florida Department of Transportation began two highway improvement construction projects which is expected to be completed by 2021. In addition to employment in construction and bringing relief for commuters, the new expanded road network adds positive risk to transportation warehousing. Moody's Analytics believes Orlando-Kissimmee-Sanford FL AA will build on its vast population of young adults and create job opportunities for skilled and unskilled labor. Theme park expansions will drive growth. Moderate costs, robust in-migration, and new infrastructure will propel growth over the next decade.

State of Massachusetts

Berkshire, MA MSA 38340 AA

Demographic Information for Full Scope Area: Trustco Bank – Berkshire, MA MSA 38340 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	39	2.56	10.26	66.67	20.51	0.00
Population by Geography	131,219	2.58	10.63	66.83	19.95	0.00
Owner-Occupied Housing by Geography	38,332	0.63	6.91	69.52	22.94	0.00
Business by Geography	9,509	8.09	7.67	62.91	21.34	0.00
Farms by Geography	348	1.15	5.75	68.68	24.43	0.00
Family Distribution by Income Level	33,202	21.78	17.02	22.60	38.61	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,882	3.70	16.88	67.44	11.99	0.00
Median Family Income		64,783	Median Housing Value		227,331	
FFIEC Adjusted Median Family Income for 2016		68,400	Unemployment Rate		3.5%	
Households Below Poverty Level		12%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

As presented above, Trustco’s Berkshire, MA, MSA 38340 AA consist of all census tracts in Berkshire County. The Bank designated all of Berkshire County, which is the only county in the Berkshire, MA MSA 38340, as its AA. The Berkshire, MA MSA 38340 is comprised of 39 census tracts in the Berkshire County. The AA census tracts are spread among one low income (2.56 percent), four moderate-income (10.26 percent), 26 middle-income (66.67 percent), eight upper-income (20.51 percent), and zero percent listed as unknown by the 2010 U.S. Census Bureau. The AA meets the requirement of the regulation and does not arbitrarily exclude low-or moderate income geographies.

According to the 2010 U.S. Census Data total population within the assessment is 131,219. The assessment area consists of 33,202 families of which 21.78 percent are low-income, 17.02 percent are moderate-income, 22.60 percent are middle-income, 38.61 are upper-income and zero percent listed as unknown. The 2010 median family income is \$64,783 and the 2016 FFIEC adjusted median family income is \$64,400. In the AA, 12 percent of household call below the poverty level.

The 2010 U.S. Census Data reported 38,332 owner-occupied housing units in the AA. Of all owner-occupied housing, 0.63 percent is located in low-income geographies, 6.91 percent is located in moderate-income geographies, 69.52 percent located in middle-income geographies, 22.94 percent located in upper-income geographies, and zero percent located in unknown geographies. The median housing value is \$227,331. A low-income individual or household in the assessment area would make under \$34,193 annually.

According to the June 30, 2016 FDIC summary of deposit Market Share report. Trustco ranked last out of 10 institutions in the AA with 0.85 percent market share. In this area, Trustco’s Bank major competitors include Berkshire Bank; TD Bank, National Association; Adams County Bank; Mountain One Bank; and Lee Bank.

Based on data from the US Bureau of Labor Statistics, the December 2016 unemployment rate for Berkshire, MA was 3.5 percent, compared to the national rate of 4.7 percent. The primary industry sectors in Berkshire, MA are hospitals, colleges, universities, restaurants, resorts, state parks, state and local government, and grocery stores. Top employers included B Mango and Bird, Berkshire Medical Center, BMC Hillcrest Campus, Canyon Ranch in Lenox and Jimmy Peak Mountain Resort.

The Berkshire, MA economy has improved over the last few years, but the labor market appears fatigued. Job growth last year was the same as it was in 2015, but monthly figures show payroll employment ended the year where it began. Steady population loss is weighing on consumer industries such as retail and leisure/ hospitality, while office-using industries employ the fewest workers in more than a decade as a result of weakening in professional/business services. Thanks to a consistently declining labor force, the unemployment rate is down sharply and approaching 3 percent, a level last breached in 2000. Meanwhile, while there have been hints of a pickup in residential construction, housing permits ended last year on a downbeat note.

Based on Moody's Analytics, Berkshire, MA AA strengths are stable employment base due to a strong healthcare presence, and stable housing market. However, among the area's weaknesses are persistent migration out of the area and a declining natural population. Relatively high energy and unit labor costs and poor track record at retaining skilled labor. Moody's Analytics believe that the Berkshire, MA AA will have a subpar 2017. The pivotal healthcare industry will grow, but growth will lag state and U.S. averages. Tourism holds the most promise longer term because structural deficiencies, including a declining population and unfavorable age structure, along with high business costs, will result in lower performance levels than at the state and national level in income and job growth over the forecast horizon.

State of Vermont

Non MSA – Vermont AA

Demographic Information for Full Scope Area: Trustco Bank - NON MSA - Vermont Bennington AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.00	25.00	58.33	16.67	0.00
Population by Geography	37,125	0.00	22.78	59.92	17.30	0.00
Owner-Occupied Housing by Geography	11,291	0.00	17.85	61.43	20.72	0.00
Business by Geography	3,059	0.00	25.73	45.80	28.47	0.00
Farms by Geography	155	0.00	18.06	58.71	23.23	0.00
Family Distribution by Income Level	10,060	18.77	19.57	21.53	40.13	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,857	0.00	34.46	53.25	12.29	0.00
Median Family Income		60,519				
FFIEC Adjusted Median Family Income for 2016		64,400	Median Housing Value		242,709	
Households Below Poverty Level		11%	Unemployment Rate		3.5%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco's Bennington County AA is a Non-MSA in Vermont, consisting of all census tracts in Bennington County. Bennington County is the only county in Vermont in which Trustco conducts business. The non-MSA AA is comprised of 12 census tracts, of which three (25 percent) are moderate-income, seven (58.33 percent are middle-income), and two (16.67 percent are upper-income). There are no low-income census tracts in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

According to the 2010 U.S. Census data, the AA had a total population of 37,125. The AA contains 10,060 families, and 18.77 percent are low-income, 19.57 percent are moderate-income, 21.53 percent are middle-income, and 40.13 percent are upper-income. The 2010 median family income was \$60,519 and the FFIEC adjusted median family income is \$64,400. Approximately 11 percent of households live below the poverty level.

The 2010 U.S. Census reported 11,291 owner-occupied housing units in the non-MSA AA. Of all owner-occupied housing, 17.85 percent is located in moderate-income geographies, 61.43 percent is located in middle-income geographies, and 20.72 percent is located in upper-income geographies. The median housing cost was \$242,709 in 2010. According to the 2010 U.S. Census data, the median housing cost was \$242,709. Shown above, a low-income individual or family earns less than \$32,194, indicating a lack of affordability for a low-income individual or family to purchase a home.

According to the June 30, 2016 FDIC Summary of Deposit Market Share report, Trustco ranked last out of seven institutions with 1.22 percent of the deposit market share. According to the same deposit data, Trustco's major competitors in the Bennington County non-MSA are The Bank of Bennington, Berkshire Bank, TD Bank, People's United Bank, and Merchants Bank.

According to the Bureau of Labor Statistics, as of December 2016, unemployment rate for the county was 3.5 percent. This is slightly lower than the national unemployment rate of 4.7 percent. The primary industries in Vermont are colleges, universities, hospitals and medical centers, state and local government, grocery stores, and food and beverage stores. Some of the major employers include University of Vermont Medical Center, Global Foundries, University of Vermont, Keurig Green Mountain, Inc., and Shaw's Supermarkets, Inc.

Vermont's expansion is steady, however, the state's job growth slightly lags behind that of the Northeast region and U.S. A solid tourism season has spurred aggressive job gains in leisure/hospitality over the past year; the pace slowed in the first quarter but was still second best in the Northeast. The low-paying nature of jobs in tourism is biting into growth in average hourly earnings, which falls well short of the U.S. average. A negative mix of job creation is another hurdle for the housing market, which is already heaving under the weight of poor demographics. In 2016, Vermont's population minimized at the fastest rate in 60 years.

Based on Moody's Analytics, Vermont's strengths are a highly educated population, solid drive-in tourism served by locally owned establishments, low crime and high social capital and highly diverse industrial structure while their weaknesses are Land-use laws that hinder development, very high business costs, slow population growth and an aging labor force. Expansion will be favorable in the coming quarters, however, if the population remains stunted, the state will struggle to match the national rate of expansion. Although, the uptick in activity at Global Foundries Essex Junction will not lead to any significant hiring, strong demand supports a favorable outlook for healthcare. Nonetheless, Vermont will remain a below-average long-term performer because of subpar demographics and above-average business costs.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. 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 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 1. Other Products - This table is not applicable and not included.

Table 2. Geographic Distribution of Home Purchase Loans - 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 market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - This table is not applicable and not included.

Table 6. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - This table is not applicable and not included.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - This table is not applicable and not included.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - This table is not applicable and not included.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

New York-Wayne-White Plains, NY-NJ Multistate Metropolitan District (MD) 35614

Table 1. Lending Volume

LENDING VOLUME												
Geography: TRUSTCO BANK												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Trustco Bank - MD 35614 AA	5.62	434	137,586	17	3,687	0	0	0	0	451	141,273	9.56

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: TRUSTCO BANK Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - MD 35614 AA	280	6.81	0.48	2.86	3.86	1.79	17.61	15.36	78.05	80.00	1.36	3.85	16.78	78.02

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT														Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Trustco Bank - MD 35614 AA	38	5.93	0.48	0.00	3.86	7.89	17.61	13.16	78.05	78.95	0.67	3.05	15.92	80.36							

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: TRUSTCO BANK Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - MD 35614 AA	115	4.06	0.48	0.87	3.86	4.35	17.61	17.39	78.05	77.39	0.74	3.28	14.70	81.27

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: TRUSTCO BANK		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*								
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Trustco Bank - MD 35614 AA	17	4.07	1.82	0.00	9.83	17.65	19.88	29.41	68.44	52.94	5.45	8.93	20.48	65.14					

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TRUSTCO BANK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate Lending Data*			
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****				
Full Review:														
Trustco Bank - MD 35614 AA	280	6.81	13.92	0.72	11.73	3.96	15.72	11.15	58.63	84.17	0.95	6.70	18.53	73.82

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate Lending Data*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total*	% Families**	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****				
Full Review:														
Trustco Bank - MD 35614 AA	38	5.93	13.92	0.00	11.73	0.00	15.72	13.51	58.63	86.49	2.30	6.90	13.86	76.93

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families* **	% BANK Loans****	% Families 5	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - MD 35614 AA	115	4.06	13.92	0.00	11.73	5.22	15.72	12.17	58.63	82.61	1.80	4.96	14.01	79.23

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by BANK.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: TRUSTCO BANK			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Trustco Bank - MD 35614 AA	17	4.07	85.18	70.59	64.71	5.88	29.41	78,342	38,337

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

State of New York

Table 1. Lending Volume

LENDING VOLUME		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Trustco Bank MSA - 10580 AA	52.49	3,859	766,019	351	66,458	0	0	12	5,840	4,222	838,317	63.06
Limited Review:												
Trustco Bank - NY Non MSA AA	3.07	230	35,577	16	1,571	0	0	0	0	246	37,148	3.29
Trustco Bank MSA- 24020 AA	5.11	394	65,519	16	2,616	0	0	0	0	410	68,135	3.36
Trustco Bank MSA - 20524 AA	1.82	145	34,075	1	29	0	0	0	0	146	34,104	1.51
Trustco Bank MSA - 28740 AA	0.40	31	5,824	1	600	0	0	0	0	32	6,424	0.22

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TRUSTCO BANK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans				
Full Review:														
Trustco Bank MSA - 10580 AA	1,993	48.49	4.37	2.56	11.32	7.38	56.55	55.19	27.76	34.87	3.20	9.23	56.27	31.29
Limited Review:														
Trustco Bank - NY Non MSA AA	99	2.41	0.66	0.00	12.46	16.16	48.12	48.48	38.76	35.35	0.17	11.35	48.60	39.87
Trustco Bank - MSA 24020 AA	202	4.91	0.00	0.00	1.69	2.97	84.43	70.30	13.88	26.73	0.00	3.27	81.33	15.40
Trustco Bank MSA - 20524 AA	77	1.87	2.24	2.60	13.88	11.69	64.81	61.04	19.08	24.68	1.87	14.14	65.38	18.60
Trustco Bank MSA - 28740 AA	19	0.46	0.00	0.00	10.41	10.53	74.43	89.47	15.16	0.00	0.00	10.53	75.45	14.02

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT														Geography: TRUSTCO BANK		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*								
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Trustco Bank MSA - 10580 AA	323	50.39	4.37	1.55	11.32	5.88	56.55	56.04	27.76	36.53	2.96	9.64	61.80	25.60					
Limited Review:																			
Trustco Bank - NY Non MSA AA	33	5.15	0.66	0.00	12.46	21.21	48.12	36.36	38.76	42.42	0.67	15.38	51.51	32.44					
Trustco Bank - MSA 24020 AA	32	4.99	0.00	0.00	1.69	0.00	84.43	71.88	13.88	28.13	0.00	0.78	83.94	15.28					
Trustco Bank MSA - 20524 AA	15	2.34	2.24	0.00	13.88	0.00	64.81	66.67	19.08	33.33	2.79	14.63	64.46	18.12					
Trustco Bank MSA - 28740 AA	2	0.31	0.00	0.00	10.41	0.00	74.43	100.00	15.16	0.00	0.00	9.56	80.20	10.24					

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: TRUSTCO BANK E valuation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank MSA - 10580 AA	1,527	53.96	4.37	1.31	11.32	6.88	56.55	55.34	27.76	36.48	2.71	9.24	57.47	30.58
Limited Review:														
Trustco Bank - NY Non MSA AA	98	3.46	0.66	0.00	12.46	10.20	48.12	39.80	38.76	50.00	0.12	8.96	44.32	46.59
Trustco Bank - MSA 24020 AA	157	5.55	0.00	0.00	1.69	1.27	84.43	75.16	13.88	23.57	0.00	2.38	81.43	16.19
Trustco Bank MSA - 20524 AA	53	1.87	2.24	0.00	13.88	5.66	64.81	66.04	19.08	28.30	1.44	11.88	64.53	22.15
Trustco Bank MSA - 28740 AA	10	0.35	0.00	0.00	10.41	0.00	74.43	90.00	15.16	10.00	0.00	8.57	73.63	17.79

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY														Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% of MF Units***	% BANK Loans**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Trustco Bank MSA - 10580 AA	16	76.19	13.50	37.50	22.87	12.50	40.10	50.00	23.53	0.00	19.42	17.27	45.32	17.99							
Limited Review:																					
Trustco Bank - NY Non MSA AA	0	0.00	2.65	0.00	17.07	0.00	66.57	0.00	13.71	0.00	0.00	16.67	66.67	16.67							
Trustco Bank - MSA 24020 AA	3	14.29	0.00	0.00	11.90	0.00	73.10	100.00	15.00	0.00	0.00	0.00	78.57	21.43							
Trustco Bank MSA - 20524 AA	0	0.00	19.11	0.00	30.59	0.00	44.20	0.00	6.10	0.00	20.00	40.00	40.00	0.00							
Trustco Bank MSA - 28740 AA	0	0.00	0.00	0.00	24.67	0.00	65.42	0.00	9.91	0.00	0.00	27.27	68.18	4.55							

* Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: TRUSTCO BANK Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businessses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank MSA - 10580 AA	351	83.97	7.50	7.69	15.55	15.67	50.41	60.97	26.50	15.67	7.13	12.78	51.45	28.65
Limited Review:														
Trustco Bank - NY Non MSA AA	16	3.83	0.83	0.00	12.36	12.50	52.34	62.50	34.32	25.00	0.33	10.75	51.94	36.97
Trustco Bank - MSA 24020 AA	16	3.83	0.00	0.00	6.42	0.00	79.76	93.75	13.82	6.25	0.00	6.47	78.57	14.96
Trustco Bank MSA - 20524 AA	1	0.24	7.32	0.00	18.63	100.00	59.40	0.00	14.61	0.00	6.38	16.66	61.84	15.12
Trustco Bank MSA - 28740 AA	1	0.24	0.00	0.00	13.43	0.00	69.59	100.00	16.98	0.00	0.00	12.29	70.28	17.43

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TRUSTCO BANK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁶	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank MSA - 10580 AA	1,993	48.49	20.53	4.93	18.05	15.85	21.80	25.50	39.62	53.73	10.31	28.61	27.81	33.27
Limited Review:														
Trustco Bank - NY Non MSA AA	99	2.41	17.42	0.00	17.28	14.29	20.07	24.49	45.23	61.22	4.08	17.68	28.76	49.49
Trustco Bank - MSA 24020 AA	202	4.91	18.07	2.99	19.24	14.93	23.61	32.34	39.09	49.75	6.22	26.34	28.96	38.48
Trustco Bank MSA - 20524 AA	77	1.87	20.89	7.89	18.74	21.05	23.52	32.89	36.85	38.16	7.76	28.17	29.19	34.88
Trustco Bank MSA - 28740 AA	19	0.46	19.57	0.00	17.81	36.84	23.03	15.79	39.59	47.37	5.35	21.18	28.99	44.48

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: TRUSTCO BANK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families** *	% BANK Loans****	% Families 7	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank MSA - 10580 AA	323	50.39	20.53	5.33	18.05	13.79	21.80	28.84	39.62	52.04	11.51	20.83	25.35	42.32
Limited Review:														
Trustco Bank - NY Non MSA AA	33	5.15	17.42	6.06	17.28	9.09	20.07	21.21	45.23	63.64	10.38	19.03	22.15	48.44
Trustco Bank - MSA 24020 AA	32	4.99	18.07	6.25	19.24	18.75	23.61	15.63	39.09	59.38	9.86	18.63	25.48	46.03
Trustco Bank MSA - 20524 AA	15	2.34	20.89	0.00	18.74	20.00	23.52	40.00	36.85	40.00	13.72	25.99	29.24	31.05
Trustco Bank MSA - 28740 AA	2	0.31	19.57	0.00	17.81	0.00	23.03	0.00	39.59	100.00	12.90	22.22	25.81	39.07

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

7 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total*	% Families**	% BANK Loans****	% Families ₈	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank MSA - 10580 AA	1,527	53.96	20.53	5.35	18.05	18.47	21.80	28.78	39.62	47.39	8.21	22.72	28.75	40.32
Limited Review:														
Trustco Bank - NY Non MSA AA	98	3.46	17.42	3.09	17.28	11.34	20.07	21.65	45.23	63.92	3.06	17.06	21.43	58.45
Trustco Bank - MSA 24020 AA	157	5.55	18.07	3.90	19.24	5.84	23.61	29.22	39.09	61.04	7.39	17.43	23.63	51.55
Trustco Bank MSA - 20524 AA	53	1.87	20.89	3.77	18.74	26.42	23.52	28.30	36.85	41.51	11.10	20.97	29.10	38.82
Trustco Bank MSA - 28740 AA	10	0.35	19.57	0.00	17.81	10.00	23.03	50.00	39.59	40.00	5.70	19.95	26.17	48.19

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by BANK.

8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: TRUSTCO BANK			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Trustco Bank MSA - 10580 AA	351	83.97	79.50	42.74	52.71	24.22	23.08	12,502	5,859
Limited Review:									
Trustco Bank - NY Non MSA AA	16	3.83	81.66	37.50	75.00	12.50	12.50	2,508	1,237
Trustco Bank - MSA 24020 AA	16	3.83	81.21	81.25	62.50	18.75	18.75	2,089	847
Trustco Bank MSA - 20524 AA	1	0.24	84.88	100.00	100.00	0.00	0.00	4,943	2,361
Trustco Bank MSA - 28740 AA	1	0.24	85.74	0.00	0.00	0.00	100.00	3,154	1,425

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Trustco Bank MSA - 28740 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 28740 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	47	0.00	14.89	70.21	14.89	0.00
Population by Geography	182,493	0.00	12.30	72.27	15.43	0.00
Owner-Occupied Housing by Geography	49,203	0.00	10.41	74.43	15.16	0.00
Business by Geography	11,393	0.00	13.43	69.59	16.98	0.00
Farms by Geography	523	0.00	6.50	67.30	26.20	0.00
Family Distribution by Income Level	45,201	19.57	17.81	23.03	39.59	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,897	0.00	18.57	71.54	9.89	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		70,513 75,900 10%	Median Housing Value Unemployment Rate		247,069 4.3%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank MSA - 20524 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 20524 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	79	6.33	15.19	62.03	13.92	2.53
Population by Geography	297,488	6.97	16.87	58.87	16.59	0.70
Owner-Occupied Housing by Geography	75,478	2.24	13.88	64.81	19.08	0.00
Business by Geography	16,824	7.32	18.63	59.40	14.61	0.04
Farms by Geography	695	1.29	10.22	71.80	16.69	0.00
Family Distribution by Income Level	73,644	20.89	18.74	23.52	36.85	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	29,183	11.54	23.54	54.21	10.70	0.00
Median Family Income	86,488	Median Housing Value		312,279		
FFIEC Adjusted Median Family Income for 2016	94,600	Unemployment Rate		4.0%		
Households Below Poverty Level	8%					

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank - MSA 24020 AA

Demographic Information for Limited Scope Area: Trustco Bank - MSA 24020 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	0.00	5.56	83.33	11.11	0.00
Population by Geography	128,923	0.00	3.47	83.45	13.08	0.00
Owner-Occupied Housing by Geography	37,761	0.00	1.69	84.43	13.88	0.00
Business by Geography	7,669	0.00	6.42	79.76	13.82	0.00
Farms by Geography	454	0.00	0.66	93.39	5.95	0.00
Family Distribution by Income Level	35,107	18.07	19.24	23.61	39.09	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	13,097	0.00	4.48	87.08	8.44	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		60,649 64,800 11%	Median Housing Value Unemployment Rate: • Warren County • Washington County		171,097 6.0% 4.9%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank - NY Non MSA AA

Demographic Information for Limited Scope Area: Trustco Bank - NY Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	52	1.92	15.38	48.08	32.69	1.92
Population by Geography	162,536	1.34	14.65	48.01	34.29	1.71
Owner-Occupied Housing by Geography	46,464	0.66	12.46	48.12	38.76	0.00
Business by Geography	8,921	0.83	12.36	52.34	34.32	0.15
Farms by Geography	665	0.00	9.77	48.87	41.35	0.00
Family Distribution by Income Level	41,424	17.42	17.28	20.07	45.23	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,374	2.49	21.75	49.19	26.57	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		54,386 58,900 11%	Median Housing Value Unemployment Rate: • Columbia County • Greene County • Montgomery County		175,924 3.6% 5.0% 5.7%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

State of Florida

Table 1. Lending Volume

LENDING VOLUME		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Trustco Bank MSA - 36740 AA	15.11	1,201	274,023	11	2,330	0	0	0	0	1,212	276,353	11.06
Limited Review:												
Trustco Bank MSA - 45300 AA	2.97	237	30,231	1	5	0	0	0	0	238	30,236	1.15
Trustco Bank MD - 48424 AA	0.87	70	16,241	0	0	0	0	0	0	70	16,241	0.25
Trustco Bank MSA - 19660 AA	2.53	201	34,951	2	860	0	0	0	0	203	35,811	1.55
Trustco Bank MSA - 29460 AA	0.80	64	8,846	0	0	0	0	0	0	64	8,846	0.40
Trustco Bank MSA - 35840 AA	5.65	453	88,922	0	0	0	0	0	0	453	88,922	2.98
Trustco Bank MSA - 37340 AA	1.13	90	17,294	1	10	0	0	0	0	91	17,304	0.38
Trustco Bank MSA - 38940 AA	0.46	37	7,958	0	0	0	0	0	0	37	7,958	0.15
Trustco Bank MSA - 39460 AA	0.95	76	14,977	0	0	0	0	0	0	76	14,977	0.50

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TRUSTCO BANK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank MSA - 36740 AA	560	13.63	0.48	0.18	20.03	10.89	43.78	32.32	35.71	56.61	0.26	15.27	44.45	40.01
Limited Review:														
Trustco Bank MSA - 45300 AA	185	4.50	3.23	0.00	18.89	30.27	36.80	55.68	41.09	14.05	1.88	13.77	35.99	48.36
Trustco Bank MD - 48424 AA	46	1.12	2.96	0.00	22.08	8.70	36.12	39.13	38.83	52.17	1.44	16.61	38.55	43.40
Trustco Bank MSA - 19660 AA	115	2.80	1.29	0.00	14.90	5.22	54.72	40.00	29.09	54.78	0.41	10.16	53.50	35.93
Trustco Bank MSA - 29460 AA	40	0.97	1.27	2.50	19.20	5.00	54.65	72.50	24.88	20.00	0.45	12.16	56.85	30.53
Trustco Bank MSA - 35840 AA	323	7.86	1.26	0.00	20.07	4.02	48.99	66.56	29.68	29.41	0.37	12.16	51.16	36.30
Trustco Bank MSA - 37340 AA	55	1.34	1.18	0.00	18.83	14.55	46.92	43.64	33.06	41.82	0.45	14.48	47.71	37.37
Trustco Bank MSA - 38940 AA	20	0.49	0.00	0.00	9.60	5.00	30.93	45.00	59.46	50.00	0.00	4.36	29.55	66.09
Trustco Bank MSA - 39460 AA	67	1.63	0.00	0.00	6.26	2.99	76.48	91.04	17.26	5.97	0.00	4.76	78.61	16.62

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT														Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Trustco Bank MSA - 36740 AA	108	16.85	0.48	0.00	20.03	9.26	43.78	30.56	35.71	60.19	0.58	16.57	41.25	41.60							
Limited Review:																					
Trustco Bank MSA - 45300 AA	4	0.62	3.23	25.00	18.89	0.00	36.80	50.00	41.09	25.00	3.07	14.58	32.67	49.68							
Trustco Bank MD - 48424 AA	5	0.78	2.96	0.00	22.08	0.00	36.12	40.00	38.83	60.00	1.35	14.38	36.47	47.80							
Trustco Bank MSA - 19660 AA	23	3.59	1.29	0.00	14.90	4.35	54.72	69.57	29.09	26.09	1.56	16.67	49.69	32.09							
Trustco Bank MSA - 29460 AA	5	0.78	1.27	0.00	19.20	0.00	54.65	40.00	24.88	60.00	1.14	17.97	51.78	29.10							
Trustco Bank MSA - 35840 AA	32	4.99	1.26	0.00	20.07	6.25	48.99	46.88	29.68	46.88	0.79	17.46	52.61	29.14							
Trustco Bank MSA - 37340 AA	7	1.09	1.18	0.00	18.83	0.00	46.92	14.29	33.06	85.71	1.73	16.38	41.89	40.00							
Trustco Bank MSA - 38940 AA	3	0.47	0.00	0.00	9.60	0.00	30.93	33.33	59.46	66.67	0.00	5.98	30.98	63.04							
Trustco Bank MSA - 39460 AA	1	0.16	0.00	0.00	6.26	0.00	76.48	100.00	17.26	0.00	0.00	4.52	79.90	15.58							

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans				
Full Review:														
Trustco Bank MSA - 36740 AA	532	18.80	0.48	0.19	20.03	9.96	43.78	32.14	35.71	57.71	0.38	13.13	41.29	45.20
Limited Review:														
Trustco Bank MSA - 45300 AA	48	1.70	3.23	0.00	18.89	8.33	36.80	52.08	41.09	39.58	1.83	11.53	33.01	53.63
Trustco Bank MD - 48424 AA	19	0.67	2.96	0.00	22.08	15.79	36.12	42.11	38.83	42.11	0.90	13.37	34.92	50.82
Trustco Bank MSA - 19660 AA	63	2.23	1.29	0.00	14.90	6.35	54.72	53.97	29.09	39.68	0.39	10.56	52.37	36.68
Trustco Bank MSA - 29460 AA	19	0.67	1.27	0.00	19.20	5.26	54.65	78.95	24.88	15.79	0.24	11.11	52.49	36.16
Trustco Bank MSA - 35840 AA	98	3.46	1.26	0.00	20.07	6.12	48.99	63.27	29.68	30.61	0.39	11.77	50.09	37.74
Trustco Bank MSA - 37340 AA	28	0.99	1.18	0.00	18.83	0.00	46.92	50.00	33.06	50.00	0.48	13.22	45.04	41.25
Trustco Bank MSA - 38940 AA	14	0.49	0.00	0.00	9.60	0.00	30.93	50.00	59.46	50.00	0.00	4.57	29.62	65.81
Trustco Bank MSA - 39460 AA	8	0.28	0.00	0.00	6.26	0.00	76.48	75.00	17.26	25.00	0.00	3.07	76.98	19.95

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: TRUSTCO BANK		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*								
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Trustco Bank MSA - 36740 AA	11	2.63	0.65	0.00	23.46	0.00	38.50	27.27	37.38	72.73	0.59	21.52	37.25	40.63					
Limited Review:																			
Trustco Bank MSA - 45300 AA	1	0.24	4.70	0.00	20.39	0.00	32.72	100.00	41.89	0.00	5.23	18.82	32.98	42.97					
Trustco Bank MD - 48424 AA	0	0.00	3.67	0.00	18.64	0.00	31.67	0.00	45.75	0.00	3.53	16.83	31.25	48.40					
Trustco Bank MSA - 19660 AA	2	0.48	3.41	0.00	20.25	100.00	45.75	0.00	30.59	0.00	4.19	17.83	42.91	35.07					
Trustco Bank MSA - 29460 AA	0	0.00	4.84	0.00	19.54	0.00	49.71	0.00	25.91	0.00	4.56	19.76	51.13	24.55					
Trustco Bank MSA - 35840 AA	0	0.00	1.48	0.00	20.48	0.00	42.50	0.00	35.54	0.00	1.49	19.40	39.94	39.17					
Trustco Bank MSA - 37340 AA	1	0.24	1.88	0.00	22.32	100.00	41.89	0.00	33.87	0.00	1.50	23.71	40.24	34.55					
Trustco Bank MSA - 38940 AA	0	0.00	0.00	0.00	15.69	0.00	32.96	0.00	51.35	0.00	0.00	17.64	29.55	52.81					
Trustco Bank MSA - 39460 AA	0	0.00	0.00	0.00	6.71	0.00	79.12	0.00	14.17	0.00	0.00	5.77	79.92	14.31					

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TRUSTCO BANK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate Lending Data*			
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****				
Full Review:														
Trustco Bank MSA - 36740 AA	560	13.63	20.08	1.98	18.64	10.79	20.77	16.37	40.51	70.86	4.77	18.16	24.27	52.79
Limited Review:														
Trustco Bank MSA - 45300 AA	185	4.50	20.82	3.78	17.28	14.05	18.46	21.62	43.44	60.54	4.57	18.26	23.38	53.78
Trustco Bank MD - 48424 AA	46	1.12	21.50	2.17	17.84	6.52	18.93	17.39	41.73	73.91	3.83	16.22	22.06	57.90
Trustco Bank MSA - 19660 AA	115	2.80	19.96	1.75	17.98	9.65	21.73	13.16	40.34	75.44	4.25	20.53	24.04	51.19
Trustco Bank MSA - 29460 AA	40	0.97	20.25	0.00	18.65	10.00	20.75	20.00	40.35	70.00	3.92	19.53	29.45	47.10
Trustco Bank MSA - 35840 AA	323	7.86	19.55	1.24	19.05	8.98	20.92	21.98	40.47	67.80	4.82	15.51	22.09	57.57
Trustco Bank MSA - 37340 AA	55	1.34	19.36	3.64	18.76	21.82	21.46	21.82	40.42	52.73	7.72	20.97	24.13	47.18
Trustco Bank MSA - 38940 AA	20	0.49	14.22	0.00	16.55	15.00	17.19	10.00	52.05	75.00	1.57	9.50	16.60	72.34
Trustco Bank MSA - 39460 AA	67	1.63	16.43	2.99	19.62	2.99	25.30	22.39	38.65	71.64	7.70	19.47	23.99	48.84

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

⁹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate Lending Data*			
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families 10	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****				
Full Review:														
Trustco Bank MSA - 36740 AA	108	16.85	20.08	1.85	18.64	11.11	20.77	16.67	40.51	70.37	11.97	15.20	19.51	53.32
Limited Review:														
Trustco Bank MSA - 45300 AA	4	0.62	20.82	25.00	17.28	25.00	18.46	25.00	43.44	25.00	9.62	14.79	17.22	58.37
Trustco Bank MD - 48424 AA	5	0.78	21.50	0.00	17.84	0.00	18.93	20.00	41.73	80.00	6.55	13.92	21.59	57.93
Trustco Bank MSA - 19660 AA	23	3.59	19.96	13.04	17.98	13.04	21.73	39.13	40.34	34.78	11.49	20.20	19.87	48.44
Trustco Bank MSA - 29460 AA	5	0.78	20.25	20.00	18.65	0.00	20.75	20.00	40.35	60.00	9.65	19.16	21.27	49.92
Trustco Bank MSA - 35840 AA	32	4.99	19.55	3.13	19.05	9.38	20.92	15.63	40.47	71.88	8.93	18.57	25.36	47.14
Trustco Bank MSA - 37340 AA	7	1.09	19.36	0.00	18.76	14.29	21.46	0.00	40.42	85.71	12.31	18.97	21.20	47.52
Trustco Bank MSA - 38940 AA	3	0.47	14.22	0.00	16.55	0.00	17.19	0.00	52.05	100.00	3.87	11.05	18.23	66.85
Trustco Bank MSA - 39460 AA	1	0.16	16.43	0.00	19.62	0.00	25.30	100.00	38.65	0.00	11.34	22.68	28.87	37.11

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

10 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10.. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: TRUSTCO BANK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate Lending Data*			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families* **	% BANK Loans****	% Families 11	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****				
Full Review:														
Trustco Bank MSA - 36740 AA	532	18.80	20.08	3.44	18.64	8.97	20.77	20.42	40.51	67.18	6.64	14.33	21.91	57.12
Limited Review:														
Trustco Bank MSA - 45300 AA	48	1.70	20.82	4.17	17.28	16.67	18.46	27.08	43.44	52.08	5.69	12.32	20.52	61.47
Trustco Bank MD - 48424 AA	19	0.67	21.50	0.00	17.84	0.00	18.93	15.79	41.73	84.21	5.54	12.79	21.88	59.79
Trustco Bank MSA - 19660 AA	63	2.23	19.96	3.28	17.98	9.84	21.73	22.95	40.34	63.93	6.15	18.11	22.14	53.59
Trustco Bank MSA - 29460 AA	19	0.67	20.25	0.00	18.65	10.53	20.75	21.05	40.35	68.42	5.95	14.67	23.91	55.47
Trustco Bank MSA - 35840 AA	98	3.46	19.55	4.08	19.05	14.29	20.92	32.65	40.47	48.98	7.22	14.86	23.81	54.11
Trustco Bank MSA - 37340 AA	28	0.99	19.36	7.14	18.76	14.29	21.46	17.86	40.42	60.71	8.95	18.50	22.44	50.11
Trustco Bank MSA - 38940 AA	14	0.49	14.22	0.00	16.55	0.00	17.19	7.14	52.05	92.86	4.53	8.25	16.49	70.74
Trustco Bank MSA - 39460 AA	8	0.28	16.43	12.50	19.62	0.00	25.30	25.00	38.65	62.50	8.79	19.83	26.44	44.94

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by BANK.

11 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: TRUSTCO BANK			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Trustco Bank MSA - 36740 AA	11	2.63	89.25	90.91	63.64	18.18	18.18	51,214	27,967
Limited Review:									
Trustco Bank MSA - 45300 AA	1	0.24	88.42	100.00	100.00	0.00	0.00	28,197	15,135
Trustco Bank MD - 48424 AA	0	0.00	90.64	0.00	0.00	0.00	0.00	47,865	26,952
Trustco Bank MSA - 19660 AA	2	0.48	90.36	100.00	0.00	0.00	100.00	9,709	5,470
Trustco Bank MSA - 29460 AA	0	0.00	88.63	0.00	0.00	0.00	0.00	8,809	4,534
Trustco Bank MSA - 35840 AA	0	0.00	90.35	0.00	0.00	0.00	0.00	19,746	10,904
Trustco Bank MSA - 37340 AA	1	0.24	88.80	100.00	100.00	0.00	0.00	9,617	5,122
Trustco Bank MSA - 38940 AA	0	0.00	89.67	0.00	0.00	0.00	0.00	4,925	2,623
Trustco Bank MSA - 39460 AA	0	0.00	91.44	0.00	0.00	0.00	0.00	3,497	1,975

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Trustco Bank MSA - 39460 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 39460 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	38	0.00	7.89	71.05	21.05	0.00
Population by Geography	159,978	0.00	7.06	76.70	16.23	0.00
Owner-Occupied Housing by Geography	58,377	0.00	6.26	76.48	17.26	0.00
Business by Geography	17,104	0.00	6.71	79.12	14.17	0.00
Farms by Geography	570	0.00	6.49	75.61	17.89	0.00
Family Distribution by Income Level	48,044	16.43	19.62	25.30	38.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	17,321	0.00	9.36	79.93	10.70	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		52,533 52,400 10%	Median Housing Value Unemployment Rate (209,325 5.0%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank MSA - 38940 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 38940 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	35	0.00	17.14	31.43	48.57	2.86
Population by Geography	146,318	0.00	15.85	29.10	55.04	0.00
Owner-Occupied Housing by Geography	47,063	0.00	9.60	30.93	59.46	0.00
Business by Geography	19,616	0.00	15.69	32.96	51.35	0.00
Farms by Geography	680	0.00	21.91	21.32	56.76	0.00
Family Distribution by Income Level	37,254	14.22	16.55	17.19	52.05	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	11,460	0.00	19.84	33.19	46.96	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		56,832 56,300 9%	Median Housing Value Unemployment Rate		271,296 4.6%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank MSA - 37340 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 37340 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	113	3.54	22.12	46.02	26.55	1.77
Population by Geography	543,376	2.39	20.42	47.51	29.68	0.00
Owner-Occupied Housing by Geography	168,706	1.18	18.83	46.92	33.06	0.00
Business by Geography	50,611	1.88	22.32	41.89	33.87	0.05
Farms by Geography	1,599	1.56	22.33	45.03	31.08	0.00
Family Distribution by Income Level	145,109	19.36	18.76	21.46	40.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	55,313	4.34	27.88	47.61	20.16	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		60,842 58,300 10%	Median Housing Value Unemployment Rate		197,498 4.9%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank MSA - 35840 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 35840 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	172	2.33	24.42	45.35	27.91	0.00
Population by Geography	702,281	2.67	23.45	46.77	27.11	0.00
Owner-Occupied Housing by Geography	228,050	1.26	20.07	48.99	29.68	0.00
Business by Geography	82,910	1.48	20.48	42.50	35.54	0.00
Farms by Geography	2,402	1.67	17.90	46.67	33.76	0.00
Family Distribution by Income Level	188,229	19.55	19.05	20.92	40.47	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	72,663	4.42	32.53	46.69	16.36	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		60,626 61,900 10%	Median Housing Value Unemployment Rate: • Manatee County • Sarasota County		266,801 4.4% 4.3%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank MSA - 29460 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 29460 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	154	3.25	23.38	49.35	23.38	0.65
Population by Geography	602,095	2.08	23.27	52.70	21.96	0.00
Owner-Occupied Housing by Geography	161,208	1.27	19.20	54.65	24.88	0.00
Business by Geography	44,257	4.84	19.54	49.71	25.91	0.00
Farms by Geography	1,845	2.28	20.49	51.98	25.26	0.00
Family Distribution by Income Level	157,222	20.25	18.65	20.75	40.35	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	61,160	3.25	33.03	50.65	13.07	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		51,395 51,800 14%	Median Housing Value Unemployment Rate		138,997 5.4%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank MSA - 19660 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 19660 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	113	4.42	19.47	53.10	23.01	0.00
Population by Geography	494,593	3.15	19.18	53.02	24.65	0.00
Owner-Occupied Housing by Geography	152,160	1.29	14.90	54.72	29.09	0.00
Business by Geography	48,699	3.41	20.25	45.75	30.59	0.00
Farms by Geography	1,825	1.64	15.84	52.82	29.70	0.00
Family Distribution by Income Level	126,653	19.96	17.98	21.73	40.34	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	48,049	4.45	26.43	52.29	16.83	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		55,217 51,700 13%	Median Housing Value Unemployment Rate		199,687 5.1%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank MD - 48424 AA

Demographic Information for Limited Scope Area: Trustco Bank MD - 48424 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	337	6.23	24.93	31.45	35.01	2.37
Population by Geography	1,320,134	4.88	26.01	33.30	35.59	0.22
Owner-Occupied Housing by Geography	384,995	2.96	22.08	36.12	38.83	0.00
Business by Geography	187,345	3.67	18.64	31.67	45.75	0.28
Farms by Geography	4,215	3.58	21.04	30.15	45.15	0.07
Family Distribution by Income Level	324,849	21.50	17.84	18.93	41.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	127,797	8.13	36.53	34.23	21.11	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		64,445 65,400 11%	Median Housing Value Unemployment Rate		288,519 4.6%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

Trustco Bank MSA - 45300 AA

Demographic Information for Limited Scope Area: Trustco Bank MSA - 45300 AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	320	7.81	22.50	36.25	30.94	2.50
Population by Geography	1,229,226	6.12	23.79	34.78	34.89	0.42
Owner-Occupied Housing by Geography	292,728	3.23	18.89	36.80	41.09	0.00
Business by Geography	131,280	4.70	20.39	32.72	41.89	0.30
Farms by Geography	3,191	3.04	18.96	37.98	40.02	0.00
Family Distribution by Income Level	295,936	20.82	17.28	18.46	43.44	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	112,751	10.88	35.45	34.85	18.82	0.00
Median Family Income		57,333	Median Housing Value Unemployment Rate		209,998	
FFIEC Adjusted Median Family Income for 2016		59,200			4.3%	
Households Below Poverty Level		13%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

State of Massachusetts

Table 1. Lending Volume

LENDING VOLUME		Geography: TRUSTCO BANK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Trustco Bank - MSA 38340 AA	0.62	50	8,348	0	0	0	0	0	0	50	8,348	0.82

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans				
Full Review:														
Trustco Bank - MSA 38340 AA	16	0.39	0.63	0.00	6.91	25.00	69.52	62.50	22.94	12.50	0.46	7.09	68.66	23.80

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: TRUSTCO BANK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - MSA 38340 AA	8	1.25	0.63	0.00	6.91	0.00	69.52	75.00	22.94	25.00	0.39	8.84	70.14	20.63

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Trustco Bank - MSA 38340 AA	26	0.92	0.63	0.00	6.91	0.00	69.52	73.08	22.94	26.92	0.41	6.12	70.44	23.03	

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: TRUSTCO BANK Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Business es***	% BANK Loans	% of Businesses**	% BANK Loans	% of Business es***	% BANK Loans	% of Business es**	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - MSA 38340 AA	0	0.00	8.09	0.00	7.67	0.00	62.91	0.00	21.34	0.00	6.86	7.69	63.43	22.01

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE														Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*										
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹²	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp							
Full Review:																					
Trustco Bank - MSA 38340 AA	16	0.39	21.78	6.25	17.02	25.00	22.60	43.75	38.61	25.00	10.17	24.16	23.09	42.58							

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

¹² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families 13	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - MSA 38340 AA	8	1.25	21.78	0.00	17.02	25.00	22.60	12.50	38.61	62.50	10.61	24.69	26.53	38.16

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

13 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families* **	% BANK Loans****	% Families 14	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - MSA 38340 AA	26	0.92	21.78	0.00	17.02	23.08	22.60	30.77	38.61	46.15	6.56	18.54	20.55	54.35

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by BANK.

14 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Trustco Bank - MSA 38340 AA	0	0.00	81.70	0.00	0.00	0.00	0.00	2,300	1,156

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Vermont

Table 1. Lending Volume

LENDING VOLUME		Geography: TRUSTCO BANK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Trustco Bank - NON MSA - Vermont AA	0.39	30	4,873	1	98	0	0	0	0	31	4,971	0.25

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans				
Full Review:														
Trustco Bank - NON MSA - Vermont AA	13	0.32	0.00	0.00	17.85	15.38	61.43	84.62	20.72	0.00	0.00	9.66	68.91	21.43

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: TRUSTCO BANK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - NON MSA - Vermont AA	2	0.31	0.00	0.00	17.85	0.00	61.43	100.00	20.72	0.00	0.00	25.71	51.43	22.86

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: TRUSTCO BANK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Trustco Bank - NON MSA - Vermont AA	15	0.53	0.00	0.00	17.85	33.33	61.43	60.00	20.72	6.67	0.00	12.40	65.20	22.40

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*										
	#	% of Total**	% of Business***	% BANK Loans	% of Businesses**	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Trustco Bank - NON MSA - Vermont AA	1	0.24	0.00	0.00	25.73	0.00	45.80	100.00	28.47	0.00	0.00	22.10	41.75	36.15							

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TRUSTCO BANK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate Lending Data*			
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹⁵	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****				
Full Review:														
Trustco Bank - NON MSA - Vermont AA	13	0.32	18.77	0.00	19.57	23.08	21.53	15.38	40.13	61.54	3.68	14.74	21.58	60.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

¹⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT														Geography: TRUSTCO BANK				E valuation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*										
	#	% of Total*	% Families**	% BANK Loans****	% Families 16	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp							
Full Review:																					
Trustco Bank - NON MSA - Vermont AA	2	0.31	18.77	0.00	19.57	0.00	21.53	100.00	40.13	0.00	8.82	23.53	29.41	38.24							

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

16 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														Geography: TRUSTCO BANK		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*								
	#	% of Total*	% Families***	% BANK Loans****	% Families 17	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp					
Full Review:																			
Trustco Bank - NON MSA - Vermont AA	15	0.53	18.77	6.67	19.57	20.00	21.53	20.00	40.13	53.33	4.02	10.05	30.15	55.78					

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by BANK.

17 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: TRUSTCO BANK			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Trustco Bank - NON MSA - Vermont AA	1	0.24	82.31	100.00	100.00	0.00	0.00	800	473

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Institution ID: Trustco Bank

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Trustco Bank - NON MSA - Vermont AA	0	0	8	194	8	194	2.30	0	0
Trustco Bank - MD 35614 AA	0	0	36	936	36	936	11.10	0	0
Trustco Bank - MSA 38340 AA	0	0	9	8	9	8	.09	0	0
Trustco Bank MSA - 10580 AA	0	0	188	1190	189	1190	14.12	0	0
Trustco Bank MSA - 36740 AA	0	0	23	1370	23	1370	16.26	0	0
Limited Review:									
Trustco Bank MSA - 45300 AA	0	0	13	1091	13	1091	12.94	0	0
Trustco Bank - NY Non MSA AA	0	0	5	4	5	4	.05	0	0
Trustco Bank - MSA 24020 AA	0	0	2	303	2	303	3.59	0	0
Trustco Bank MD - 48424 AA	0	0	4	465	4	465	5.52	0	0
Trustco Bank MSA - 19660 AA	0	0	4	532	4	532	6.31	0	0
Trustco Bank MSA - 20524 AA	0	0	2	223	2	223	2.65	0	0
Trustco Bank MSA - 28740 AA	0	0	0	0	0	0	0.00	0	0
Trustco Bank MSA - 29460 AA	0	0	7	223	7	223	2.64	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Limited Review:									
Trustco Bank MSA - 35840 AA	0	0	6	62	6	62	.74	0	0
Trustco Bank MSA - 37340 AA	0	0	9	1154	9	1154	13.69	0	0
Trustco Bank MSA - 38940 AA	0	0	1	140	1	140	1.66	0	0
Trustco Bank MSA - 39460 AA	0	0	5	533	5	533	6.33	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: TRUSTCO BANK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Trustco Bank - NON MSA - Vermont AA	100.00	1	0.00	0.00	100.0%	0.00	0.00	0	0	0	0	0	0	0.00	22.78	59.92	17.30
Trustco Bank - MD 35614 AA	0.00	17	0.00	0.00	0.00	29.41%	70.59%	0	0	0	0	0	0	2.44	9.76	22.23	65.33
Trustco Bank - MSA 38340 AA	0.00	4	0.00	0.00	0.00	75.0%	25.0%	0	0	0	0	0	0	2.58	10.63	66.83	19.95
Trustco Bank MSA - 10580 AA	0.00	54	0.00	9.26%	9.26%	51.85%	29.63%	0	0	0	0	0	0	9.63	14.16	50.96	24.89
Trustco Bank MSA - 36740 AA	0.00	35	0.00	0.00	14.3%	40.0%	45.7%	3	0	0	0	1	2	1.09	26.67	41.33	30.90
Limited Review:																	
Trustco Bank MSA - 45300 AA	0.00	2	0.00	0.00	0.00	100.0%	0.00	0	0	0	0	0	0	6.12	23.79	34.78	34.89
Trustco Bank - NY Non MSA AA	0.00	6	0.00	0.00	0.00	66.7%	33.3%	1	0	0	0	1	0	1.34	14.65	48.01	34.29
Trustco Bank - MSA 24020 AA	0.00	6	0.00	0.00	0.00	100.0%	0.00	1	0	0	0	1	0	0.00	3.47	83.45	13.08
Trustco Bank MD - 48424 AA	0.00	1	0.00	0.00	100.0%	0.00	0.00	0	0	0	0	0	0	4.88	26.01	33.30	35.59
Trustco Bank MSA - 19660 AA	0.00	3	0.00	0.00	33.3%	0.00	66.7%	0	0	0	0	0	0	3.15	19.18	53.02	24.65
Trustco Bank MSA - 20524 AA	0.00	4	0.00	0.00	25.0%	50.0%	25.0%	0	0	0	0	0	0	6.97	16.87	58.87	16.59
Trustco Bank MSA - 28740 AA	0.00	2	0.00	0.00	50.0%	50.0%	0.00	0	0	0	0	0	0	0.00	12.30	72.27	15.43
Trustco Bank MSA - 29460 AA	0.00	2	0.00	0.00	0.00	50.0%	50.0%	0	0	0	0	0	0	2.08	23.27	52.70	21.96

Institution ID: Trustco Bank

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: TRUSTCO BANK Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Limited Review:																	
Trustco Bank MSA - 35840 AA	0.00	5	0.00	0.00	20.0%	60.0%	20.0%	1	0	0	0	1	0	2.67	23.45	46.77	27.11
Trustco Bank MSA - 37340 AA	0.00	1	0.00	0.00	0.00	100.0%	0.00	0	0	0	0	0	0	2.39	20.42	47.51	29.68
Trustco Bank MSA - 38940 AA	0.00	1	0.00	0.00	100.0%	0.00	0.00	1	0	0	1	0	0	0.00	15.85	29.10	55.04
Trustco Bank MSA - 39460 AA	0.00	1	0.00	0.00	0.00	100.0%	0.00	0	0	0	0	0	0	0.00	7.06	76.70	16.23

Institution ID: Trustco Bank

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM																	
Geography: TRUSTCO BANK																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016																	
Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Trustco Bank - NON MSA - Vermont AA	100.00	1	0.69%	0.00	100.0%	0.00	0.00	2	153	0	50.0%	50.0%	0	0.00	22.78	59.92	17.30
Trustco Bank - MD 35614 AA	0.00	17	11.72%	0.00	0.00	29.41%	70.59%	17	153	0	0	29.41%	70.59%	2.44	9.76	22.23	65.33
Trustco Bank - MSA 38340 AA	0.00	4	2.76%	0.00	0.00	75.0%	25.0%	4	153	0	0	75.0%	25.0%	2.58	10.63	66.83	19.95
Trustco Bank MSA - 10580 AA	0.00	54	37.24%	9.26%	9.26%	51.85%	29.63%	61	153	8.19%	8.19%	47.54%	26.23%	9.63	14.16	50.96	24.89
Trustco Bank MSA - 36740 AA	0.00	35	24.14%	0.00	14.3%	40.0%	45.7%	35	153	0	14.3%	40.0%	45.7%	1.09	26.67	41.33	30.90
Limited Review:																	
Trustco Bank MSA - 45300 AA	0.00	2	1.38%	0.00	0.00	100.0%	0.00	2	153	0.00	0.00	100.0%	0.00	6.12	23.79	34.78	34.89
Trustco Bank - NY Non MSA AA	0.00	6	4.14%	0.00	0.00	66.7%	33.3%	6	153	0.00	0.00	66.7%	33.3%	1.34	14.65	48.01	34.29
Trustco Bank - MSA 24020 AA	0.00	6	4.14%	0.00	0.00	100.0%	0.00	6	153	0.00	0.00	100.0%	0.00	0.00	3.47	83.45	13.08
Trustco Bank MD - 48424 AA	0.00	1	0.69%	0.00	100.0%	0.00	0.00	1	153	0.00	100.0%	0.00	0.00	4.88	26.01	33.30	35.59
Trustco Bank MSA - 19660 AA	0.00	3	2.07%	0.00	33.3%	0.00	66.7%	3	153	0.00	33.3%	0.00	66.7%	3.15	19.18	53.02	24.65
Trustco Bank MSA - 20524 AA	0.00	4	2.76%	0.00	25.0%	50.0%	25.0%	4	153	0.00	25.0%	50.0%	25.0%	6.97	16.87	58.87	16.59
Trustco Bank MSA - 28740 AA	0.00	2	1.38%	0.00	50.0%	50.0%	0.00	2	153	0.00	50.0%	50.0%	0.00	0.00	12.30	72.27	15.43
Trustco Bank MSA - 29460 AA	0.00	2	1.38%	0.00	0.00	50.0%	50.0%	2	153	0.00	0.00	50.0%	50.0%	2.08	23.27	52.70	21.96

Institution ID: Trustco Bank

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM																		
Geography: TRUSTCO BANK																		
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016																		
Assessment Area:	Deposits	Branches						ATMs						Population				
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Limited Review:																		
Trustco Bank MSA - 35840 AA	0.00	5	3.45%	0.00	20.0%	60.0%	20.0%	5	153	0.00	20.0%	60.0%	20.0%	2.67	23.45	46.77	27.11	
Trustco Bank MSA - 37340 AA	0.00	1	0.69%	0.00	0.00	100.0%	0.00	1	153	0.00	0.00	100.0%	0.00	2.39	20.42	47.51	29.68	
Trustco Bank MSA - 38940 AA	0.00	1	0.69%	0.00	100.0%	0.00	0.00	1	153	0.00	100.0%	0.00	0.00	0.00	15.85	29.10	55.04	
Trustco Bank MSA - 39460 AA	0.00	1	0.69%	0.00	0.00	100.0%	0.00	1	153	0.00	0.00	100.0%	0.00	0.00	7.06	76.70	16.23	