



PUBLIC DISCLOSURE

January 26, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Upstate National Bank
Charter Number: 12018

729 Proctor Avenue
Ogdensburg, NY 13669

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite A132
East Syracuse, NY 13057

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on The Upstate National Bank's (UNB or bank) performance in the assessment area (AA) in the state of New York, which demonstrated an overall excellent distribution of loans to geographies of different income levels and an overall reasonable distribution of loans to borrowers of different income levels.
- UNB's average loan-to-deposit ratio (LTD) was more than reasonable based on the bank's size, financial condition, and credit needs of the AAs.
- A majority of home mortgage loans originated during the evaluation period were inside the AAs.
- UNB did not have any complaints regarding its Community Reinvestment Act (CRA) performance during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was more than reasonable. UNB's average LTD ratio for the 20-quarter period following the date of the prior evaluation period, January 1, 2021, through the end of the current evaluation period, December 31, 2025, was 113.8 percent. In comparison, the quarterly average LTD of four similarly situated banks in the surrounding areas was 95.1 percent during the same period, with ratios ranging from a low of 76.9 percent to a high of 118.0 percent.

Lending in Assessment Area

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

The bank originated and purchased 52.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. UNB was not required to maintain data in accordance with the Home Mortgage Disclosure Act (HMDA); therefore, home mortgage performance was assessed based on a loan sample and does not include the entire population of loan originations and purchases. UNB did not submit affiliate lending data for consideration.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	27	52.9	24	47.1	51	13,393	46.0	15,741	54.0	29,134
Total	27	52.9	24	47.1	51	13,393	46.0	15,741	54.0	29,134

Source: 1/1/2023 - 12/31/2025 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

UNB is a \$277 million, single state, community bank headquartered in Rochester, NY. The bank's main office is located in Ogdensburg, NY; however, all administrative and operational activity is handled in Rochester, NY. The bank is privately owned by a majority shareholder. The bank operates three full-service branches in the state of New York: one is located in the city of Rochester, NY, which is part of the Rochester metropolitan statistical area (MSA); one is located in the town of Philadelphia, NY, which is part of the Watertown-Fort Drum NY MSA; and one is located in the town of Ogdensburg, NY, which is part of the non-MSA portion of the state. The bank does not have any automated teller machines.

UNB offers traditional products and services, with a primary focus on commercial banking products. Lending products include real estate loans, business lines of credit, consumer credit services, and other lending products. Real estate loans include permanent loans, construction and bridge loans, subdivision development loans, and real estate lines of credit. The bank is not licensed to originate residential mortgage loans. Rather, home mortgage loans are commercial real estate loans to investors. Business lines of credit include lines of credit on demand basis, lines of credit with maturity dates (revolving and non-revolving), and formula-based lines of credit. Consumer credit services include certificate of deposit secured loans, overdraft lines of credit, personal revolving lines of credit, and personal installment loans (secured and unsecured). Moreover, other lending products include term loans, demand loans, small business administration financing, standby letters of credit, time notes, and bond anticipation for municipalities. Deposit products include personal checking, money market, savings accounts, and certificates of deposit.

As of December 31, 2025, UNB had total deposits of \$190.6 million and tier 1 capital of \$29.5 million. Net loans and leases totaled \$221.1 million. Real estate loans composed the vast majority of loans, accounting for \$215.3 million or 97.4 percent of net loans and leases. Of these, one- to four-family and multifamily loans represented \$102.6 million and \$63.3 million, respectively.

UNB's prior CRA evaluation dated December 6, 2021, resulted in a "Satisfactory" rating based on a "Satisfactory" Lending Test rating. Since the prior evaluation, the bank has experienced legal and financial impediments hindering its ability to meet the credit needs of its AAs. On November 16, 2023, the Office of the Comptroller of the Currency (OCC) entered into a Consent Order (order) with the bank to address unsafe or unsound practices relating to board oversight and corporate governance, strategic and capital planning, interest rate risk management, and liquidity risk management. From the date of the order through its termination on December 18, 2025, the board and management prioritized liquidity and capital preservation while they remediated findings. The OCC considered these impediments during this evaluation of bank performance.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's performance in its AAs under the CRA. The OCC evaluated the bank's performance under the Small Bank CRA procedures, which includes the Lending Test. The Lending Test evaluates the bank's records of meeting the credit needs of its AAs through its primary lending product, home mortgage loans. During the evaluation period, home mortgage loans were 74 percent of the total number loans originated by count and 85 percent of the total loans originated by dollar amount. The evaluation period was January 1, 2023, to December 31, 2025. The

Office and Management and Budget revised the delineation for the Rochester, NY MSA during the evaluation period. As a result, the OCC assessed 2023 lending activities against the 2020 U.S. Census data and 2024 and 2025 lending activities against the 2024 U.S. Census data.

UNB was not required to maintain loan data in accordance with HMDA during the evaluation period. Therefore, the OCC determined the bank's performance under the Lending Test using a random loan sample for home mortgage loans and considered the results in context as they do not represent the bank's total originations and purchases during the evaluation period.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is based on the rating for the state of New York. The State Rating is based on the full-scope review of the bank's Rochester NY MSA AA and the limited-scope reviews of the Watertown-Fort Drum NY MSA AA and the NY Non MSA AA. The OCC placed the most weight on performance of the Rochester NY MSA AA as it represents the largest portion of deposits and lending activity.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- UNB had an excellent distribution of home mortgage loans to geographies of different income levels within the AAs.
- UNB had a reasonable distribution of home mortgage loans to borrowers of different income levels within the AAs.
- UNB did not have any CRA related complaints during the evaluation period.

Description of Institution's Operations in New York

UNB has three AAs within the state of New York consisting of the Rochester NY MSA AA (MSA #40380), the Watertown-Fort Drum NY MSA AA (MSA #48060), and the NY Non MSA AA. The Rochester NY MSA AA consists of Monroe County – one of the five counties located in the MSA. The Watertown-Fort Drum MSA AA consists of a portion of Jefferson County and the NY Non MSA AA consists of a portion St. Lawrence County. The AAs meet the requirements of the CRA and do not arbitrarily exclude any low- or moderate-income census tracts.

UNB's primary lending product in the state of New York during the evaluation period was home mortgage loans originated and purchased within its AAs. UNB offered its full range of traditional loan and deposit products and services through its three branches located in Rochester, Philadelphia, and Ogdensburg, NY. The Rochester branch is located in an unknown-income census tract, the Philadelphia branch is located in a middle-income census tract, and the Ogdensburg branch is located in an upper-income census tract. The bank did not open or close any branches during the evaluation period.

Rochester NY MSA AA

The Rochester NY MSA AA consists of Monroe County in its entirety, which includes the City of Rochester. Per the 2024 U.S. Census data, the AA included 39 low-income, 32 moderate-income, 67 middle-income, and 63 upper-income census tracts. Ten census tracts had no corresponding census-level income available. According to the Federal Financial Institutions Examination Council (FFIEC) list of distressed and undeserved tracts, there were no census tracts designated as distressed or undeserved in the AA.

UNB operates in a competitive financial services market. Competition from other financial institutions is strong as 16 institutions with 132 offices and \$18.2 billion in total deposits operate in the AA. Per the Federal Deposit Insurance Corporation market share data as of June 30, 2025, UNB had a market share of 0.79 percent with \$143.8 million in deposits, ranking 11th among competitors. The top competitors for

deposit market share include M&T Bank with 23.1 percent, JPMorgan Chase Bank, N.A. with 16.9 percent, KeyBank, N.A. with 16.6 percent, and The Canandaigua National Bank and Trust Company with 13.2 percent.

Economic Data

Economic conditions in the AA remain relatively stable. According to the U.S. Bureau of Labor Statistics’ December 2025 data, the unemployment rate (not seasonally adjusted) in Monroe County was 3.7 percent, which was better than the state unemployment rate of 4.2 percent. During the evaluation period, the unemployment rate for Monroe County ranged from a low of 2.7 percent in April 2023 to a high of 4.3 percent in both February 2024 and February 2025. According to Moody’s Analytics, education and health services, government, and professional and business services are the most prominent industries in the Rochester, NY MSA. Major employers include University of Rochester, Rochester Regional Health, Wegmans Food Markets Inc., Paychex, and Rochester Institute of Technology.

Community Contacts

During the evaluation period, the OCC and other financial regulators met with local government offices and nonprofit organizations that provide homeownership services and promote local economic development within the AA. Contacts from these organizations identified a need for affordable housing, homeownership assistance, and housing renovation improvements. Contacts noted the quality of affordable housing is poor and rising input costs present challenges for low- and moderate-income individuals and landlords to make required repairs and renovations. In addition, there is a strong demand for down payment assistance programs and interest rate buy downs to assist with overall housing affordability.

Assessment Area – Rochester NY MSA AA – 2023						
						2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	211	18.48	16.11	31.28	29.38	4.74
Population by Geography	759,443	13.30	15.45	35.33	34.76	1.16
Housing Units by Geography	329,105	13.28	17.39	36.70	31.69	0.94
Owner-Occupied Housing by Geography	193,319	5.91	13.15	39.32	41.39	0.23
Occupied Rental Units by Geography	111,891	23.01	23.72	33.71	17.59	1.96
Vacant Units by Geography	23,895	27.33	21.99	29.50	19.28	1.91
Businesses by Geography	27,062	8.46	13.83	37.59	36.41	3.71
Farms by Geography	728	3.98	11.68	36.95	46.02	1.37
Family Distribution by Income Level	183,050	21.93	16.50	19.58	42.00	0.00
Household Distribution by Income Level	305,210	25.53	15.04	17.07	42.36	0.00
Unemployment rate (%)	5.29	11.99	6.93	4.45	3.30	11.93
Households Below Poverty Level (%)	13.18	37.40	16.85	9.74	5.41	41.40
Median Family Income (40380 - Rochester, NY MSA)		\$80,423		Median Housing Value		\$135,300
Median Family Income (40380 - Rochester, NY MSA) for 2023		\$97,300		Median Gross Rent		\$933
				Families Below Poverty Level		9.72
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area – Rochester NY MSA AA – 2024-2025						
						2024 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	211	18.48	15.17	31.75	29.86	4.74
Population by Geography	759,443	13.30	14.51	35.61	35.43	1.16
Housing Units by Geography	329,105	13.28	16.47	36.92	32.39	0.94
Owner-Occupied Housing by Geography	193,319	5.91	12.09	39.51	42.26	0.23
Occupied Rental Units by Geography	111,891	23.01	23.00	34.13	17.90	1.96
Vacant Units by Geography	23,895	27.33	21.39	29.06	20.31	1.91
Businesses by Geography	25,960	8.86	13.67	37.40	36.60	3.47
Farms by Geography	769	6.50	12.61	38.10	41.61	1.17
Family Distribution by Income Level	183,050	21.60	16.27	19.45	42.68	0.00
Household Distribution by Income Level	305,210	25.60	15.06	17.11	42.24	0.00
Unemployment rate (%)	5.29	11.99	7.12	4.42	3.34	11.93
Households Below Poverty Level (%)	13.18	37.40	17.36	9.79	5.38	41.40
Median Family Income (40380 - Rochester, NY MSA)		\$79,424		Median Housing Value		\$135,300
Median Family Income (40380 - Rochester, NY MSA) for 2025		\$103,900		Median Gross Rent		\$933
				Families Below Poverty Level		9.72
FFIEC File - 2024 Census						
2025 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in New York

The OCC conducted a full-scope review of the Rochester NY MSA AA and limited-scope reviews of the Watertown-Fort Drum NY MSA AA and NY Non MSA AA for the evaluation period of January 1, 2023, to December 31, 2025. The Rochester NY MSA AA accounted for 83.1 percent of total bank deposits. During the evaluation period, UNB did not originate or purchase a statistically significant number of loans in the Watertown-Fort Drum NY MSA AA or NY Non MSA AA to perform a meaningful full-scope analysis. Home mortgage lending was the only primary product considered.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Rochester NY MSA AA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state of New York.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent. During the evaluation period, the geographic distribution of home mortgage loans exceeded the percentage of households and aggregate lending in low- and moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The distribution of loans to individuals of different incomes is reasonable. During the evaluation period, the bank did not originate or purchase any loans to natural people. As previously discussed, the bank is not licensed to originate residential mortgages in-house. Rather, the bank originates commercial real estate loans to investors that are secured by one- to four-family or multifamily units. During the evaluation period, the bank originated 26 commercial real estate loans to investors to purchase, refinance, or renovate 74 properties with 180 rental units within the AA. Assuming a 30 percent standard for housing affordability, a low-income borrower making \$51,950 per year (or less than 50 percent of the 2025 FFIEC adjusted median family income in the AA) could afford a rental payment of \$1,299 per month. Similarly, a moderate-income borrower making \$83,120 per year (or less than 80 percent of the 2025 FFIEC adjusted median family income in the AA) could afford a rental payment of \$2,078 per month. Low-income individuals could afford to rent 112 or 62 percent of the units and moderate-income borrowers could afford to rent 152 or 84 percent of the units. The rental rate for 18 of the properties was not available.

Responses to Complaints

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

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Watertown-Fort Drum NY MSA AA and NY Non MSA AA was weaker than the bank's overall performance under the Lending Test in the full-scope AA. The limited-scope areas had an overall neutral impact on overall performance given limited bank deposit and lending activity.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2023 – 12/31/2025	
Bank Products Reviewed:	Home mortgage loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
Rochester NY MSA AA	Full-Scope	Monroe County
Watertown-Fort Drum NY MSA AA	Limited-Scope	Jefferson County (partial)
NY Non MSA AA	Limited-Scope	St. Lawrence County (partial)

Appendix B: Summary of State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
The Upstate National Bank	Satisfactory
State:	
New York	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Rochester NY MSA AA	17	4,585	100	17,954	5.91	29.41	7.73	13.15	17.65	14.48	39.32	35.29	39.28	41.39	17.65	38.14	0.23	0	0.36
Total	17	4,585	100	17,954	5.91	29.41	7.73	13.15	17.65	14.48	39.32	35.29	39.28	41.39	17.65	38.14	0.23	0	0.36

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2024 - 2025**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Rochester NY MSA AA	9	8,172	100	17,598	5.91	22.22	8.54	12.09	66.67	13.69	39.51	0	39.06	42.26	11.11	38.35	0.23	0	0.35
Total	9	8,172	100	17,598	5.91	22.22	8.54	12.09	66.67	13.69	39.51	0	39.06	42.26	11.11	38.35	0.23	0	0.35

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Rochester NY MSA AA	17	4,585	100	17,954	21.93	0	10.16	16.50	0	21.31	19.58	0	21.67	42.00	0	30.38	0	100	16.48
Total	17	4,585	100	17,954	21.93	0	10.16	16.50	0	21.31	19.58	0	21.67	42.00	0	30.38	0	100	16.48

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024 - 2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Rochester NY MSA AA	9	8,172	100	17,598	21.60	0	9.81	16.27	0	20.91	19.45	0	22.23	42.68	0	32.78	0	100	14.27
Total	9	8,172	100	17,598	21.60	0	9.81	16.27	0	20.91	19.45	0	22.23	42.68	0	32.78	0	100	14.27

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%