



**PUBLIC DISCLOSURE**

January 6, 2026

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Champlain National Bank  
Charter Number: 9405

Main and William Streets, 7558 Court Street  
Elizabethtown, NY 12932

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 community development test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on Champlain National Bank’s (CNB or bank) performance in the assessment area (AA) in the state of New York. CNB’s performance demonstrated a reasonable loan-to-deposit (LTD) ratio, a majority of loans were originated inside the AA, a reasonable distribution of loans by income level of the geography, and an excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The Community Development (CD) Test rating is based on performance in the state of New York. CNB’s performance exhibited excellent responsiveness to CD needs through CD loans, qualified investments, and CD services.
- CNB did not receive any Community Reinvestment Act (CRA) related complaints during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AA, the bank’s LTD ratio was reasonable. CNB’s average LTD ratio for the 12-quarter period following the date of the prior evaluation period, December 31, 2021, through the end of the current evaluation period, December 31, 2024, was 74.7 percent. In comparison, the quarterly average LTD ratio of five similarly situated banks was 89.8 percent, ranging from a low of 68.3 percent to a high of 121.4 percent.

### Lending in Assessment Area

A majority of the bank’s loans were inside its AA.

The bank originated and purchased 79.8 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	22	81.5	5	18.5	27	2,707	69.0	1,215	31.0	3,922
Small Business	29	93.6	2	6.5	31	4,782	97.0	150	3.0	4,932
Consumer	40	71.4	16	28.6	56	1,209	73.5	436	26.5	1,645
<b>Total</b>	<b>91</b>	<b>79.8</b>	<b>23</b>	<b>20.2</b>	<b>114</b>	<b>8,698</b>	<b>82.8</b>	<b>1,801</b>	<b>17.2</b>	<b>10,499</b>

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

## Description of Institution

CNB is an intrastate community bank headquartered in Willsboro, New York. As of December 31, 2024, CNB had \$473.7 million in total assets. The bank is wholly owned by Champlain Bank Corporation, a single bank holding company. CNB's 10 branches are located in Clinton, Essex, and Franklin counties. All of Essex County and a majority of Clinton and Franklin counties are covered by the Adirondack Park, a 6-million-acre park consisting of state- and privately-owned lands with tight controls over land usage. The bank did not open or close any branch offices during the evaluation period. The branch and deposit-taking automated teller machine (ATM) located in Saranac Lake, New York, relocated on November 16, 2022, from 622 Lake Flower Avenue, Saranac Lake, New York, to 151 Church Street, Saranac Lake, New York. The relocation of the Saranac Lake branch moved CNB into Franklin County.

CNB's strategy during the evaluation period was to safely grow deposits and loans with a focus on digital products and services. The bank offers traditional and non-complex lending and deposit products and services to customers in its sole AA through its branch network, online banking, and mobile banking application. Each branch is equipped with an ATM, eight of which are deposit-taking. Eight branches have a drive-up window, and one has a walk-up window.

As of December 31, 2024, CNB had \$411.4 million in deposits and \$50.4 million of tier 1 capital. Gross loans totaled \$324.6 million, representing 66 percent of average assets. The bank's loan portfolio mix consisted of 50.7 percent commercial real estate loans, 24.1 percent residential real estate loans, 14.4 percent auto loans, and 6.1 percent commercial and industrial loans.

CNB had no legal, financial, or other impediments hindering its ability to help meet the credit needs in its AA. CNB's prior Performance Evaluation dated January 9, 2023, resulted in an "Outstanding" rating based on a "Satisfactory" Lending Test and an "Outstanding" CD Test rating.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated CNB's performance using intermediate small bank examination procedures, which includes the Lending Test and the CD Test. The Lending Test evaluated the bank's record of meeting the credit needs of its AA through its primary lending products, home mortgage, small business, and consumer loans. The OCC gave more weight to the bank's consumer lending as it represented a significant majority of the bank's lending activities during the evaluation period. Consumer, small business, and home mortgage loans represented 81.5 percent, 10 percent, and 8.4 percent of the total number of loans originated during the evaluation period, respectively. Activities evaluated under the CD Test included CD loans and services, qualified investments, grants, and donations based on the need of the community and the bank's capacities. The evaluation period for both tests was January 1, 2022, through December 31, 2024. The OCC assessed 2022, 2023, and 2024 lending activities against the 2020 U.S. Census data.

CNB was not required to maintain a CRA register for small business data. In addition, consumer loan data is not reported. The OCC determined the bank's performance under the Lending Test using a loan sample from the entire evaluation period for the bank's three primary products. Results were considered

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**

CNB's overall rating is based on performance in the state of New York. The state Rating is based on the full-scope review of the bank's NY Non MSA AA.

### **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<sup>1</sup>: Satisfactory**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Outstanding**

The major factors that support this rating include:

- The distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to individuals of different income levels and to businesses of different sizes is excellent.
- The bank had excellent responsiveness to CD needs through CD loans, qualified investments, and CD services.
- The bank did not receive any CRA related complaints during the evaluation period.

### Description of Institution's Operations in New York

As of December 31, 2024, CNB had one AA in the state of New York, the NY Non MSA AA. The AA encompassed Clinton and Essex counties in their entirety, and two census tracts in Franklin County. The AA met the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income areas.

### New York Non MSA AA

Assessment Area - NY Non MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.00	14.29	71.43	11.90	2.38
Population by Geography	122,478	0.00	12.05	77.40	8.73	1.82
Housing Units by Geography	66,678	0.00	10.88	80.01	9.11	0.00
Owner-Occupied Housing by Geography	35,328	0.00	8.57	83.16	8.27	0.00
Occupied Rental Units by Geography	14,895	0.00	20.37	68.79	10.84	0.00
Vacant Units by Geography	16,455	0.00	7.25	83.40	9.35	0.00
Businesses by Geography	3,967	0.00	14.09	73.00	11.85	1.06
Farms by Geography	221	0.00	8.14	86.88	4.98	0.00
Family Distribution by Income Level	30,464	19.02	16.16	21.83	43.00	0.00
Household Distribution by Income Level	50,223	21.39	15.48	18.64	44.49	0.00
Unemployment rate (%)	4.46	0.00	5.20	3.99	4.19	24.78
Households Below Poverty Level (%)	12.02	0.00	21.17	11.06	8.24	0.00
Median Family Income (Non-MSAs - NY)		\$68,606		Median Housing Value		\$144,950

<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Assessment Area - NY Non MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income (Non-MSAs - NY) for 2024		\$83,800			Median Gross Rent	\$809
					Families Below Poverty Level	7.70
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The AA consisted of 42 contiguous census tracts and included six moderate-income census tracts, 30 middle-income census tracts, five upper-income census tracts, and one census tract without an income classification. There were no low-income census tracts in the AA. According to the Federal Financial Institutions Examination Council's (FFIEC) list of distressed and underserved tracts, there were no middle-income census tracts designated as distressed or underserved in the AA.

CNB offered its full range of products and services through its 10 branch locations in the AA, as well as its online banking and mobile banking application. Nine branches were in middle-income census tracts, and one was in an upper-income census tract.

CNB does not operate in a competitive financial services market. Competition from other financial institutions is low as only eight institutions with 53 offices and \$3.7 billion in total deposits operate in the AA. According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Market Share Report, CNB ranked sixth amongst competitors in its AA with a deposit market share of 10.5 percent.

Economic conditions in the AA remain relatively stable. The OCC considered the poverty level, local industry, and unemployment rate across the AA in the evaluation of lending performance. Households and families living below the poverty level in the AA represented 12.0 percent and 7.7 percent, respectively. Per U.S. Census data, educational services, health care, and social assistance are the most prominent industries in Clinton, Essex, and Franklin counties. The unemployment rate within the AA represented 4.5 percent.

The OCC utilized two community contacts, a community needs assessment, and a housing needs assessment in the bank's AA to determine local economic conditions and community needs. One of the community contacts was an organization focused on alleviating poverty through practical, timely, and innovative programs and services. The other community contact was a public benefit corporation that offers financial benefits that help facilitate the development and improvement of new and local businesses. The community contacts indicated a need for funding to support affordable housing, transportation, workforce development, and childcare.

## Scope of Evaluation in New York

The OCC conducted a full-scope review of the NY Non MSA AA. The evaluation period covered January 1, 2022, to December 31, 2024, and considered both consumer and small business lending.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN New York**

### **LENDING TEST**

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

#### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's lending performance in the state of New York was reasonable.

#### **Distribution of Loans by Income Level of the Geography**

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

##### ***Home Mortgage Loans***

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

The geographic distribution of home mortgage loans was excellent. The bank's level of home mortgage lending in moderate-income census tracts exceeded the percentage of owner-occupied housing units and aggregate lending in the AA. There were no low-income geographies in the AA.

##### ***Small Loans to Businesses***

Refer to Table 9 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was poor. The geographic distribution of small loans to businesses in moderate-income census tracts was below aggregate lending in the AA and well below the percentage of small businesses in moderate-income census tracts. There were no low-income geographies in the AA.

##### ***Consumer Loans***

Refer to Table 13 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 consumer loan originations and purchases.

The geographic distribution of consumer loans was reasonable. The bank's level of consumer loans in moderate-income census tracts was near to the percentage of moderate-income households in the AA. There were no low-income geographies in the AA.

##### ***Lending Gap Analysis***

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

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans to individuals of different income levels and businesses of different sizes, 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 home mortgage loans to borrowers of different income levels was reasonable. The bank's lending to low-income borrowers was well below the number of low-income families in the AA but was near to the percentage of aggregate lending to low-income borrowers in the AA. The bank's lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and aggregate lending to moderate-income borrowers in the AA.

### ***Small Loans to Businesses***

Refer to Table 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 originations and purchases of small loans to businesses.

The distribution of small loans to businesses of different sizes is excellent. The distribution of small loans to businesses with less than \$1 million in revenue is below the percentage of businesses with less than \$1 million in revenue but exceeds aggregate lending in the AA.

### ***Consumer Loans***

Refer to Table 14 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 consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels was excellent. The bank's lending to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income households in the AA.

## **Responses to Complaints**

There were no CRA-related complaints during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the CD Test in the state of New York is rated Outstanding.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank exhibited excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

## Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
NY Non MSA	3	100.0	2,022	100.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>2,022</b>	<b>100.0</b>

CNB demonstrated adequate responsiveness to CD needs through CD loans. CNB originated three qualified CD loans during the evaluation period totaling \$2 million. The loans were to organizations focused on providing affordable housing to low- and moderate-income individuals and families in the AA. Affordable housing remains a significant need in the AA.

## Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NY Non MSA	25	4,313	5	2,759	30	100.0	7,072	100.0	0	0
<b>Total</b>	<b>25</b>	<b>4,313</b>	<b>5</b>	<b>2,759</b>	<b>30</b>	<b>100.0</b>	<b>7,072</b>	<b>100.0</b>	<b>0</b>	<b>0</b>

CNB demonstrated excellent responsiveness to CD needs through qualified investments and grants. During the evaluation period, CNB made two investments totaling \$2.8 million and three grants totaling \$8,500 in the AA. In addition, the AA benefitted from the ongoing impact of 25 prior period CD investments totaling \$4.3 million. Total qualified CD investments and grants were equivalent to 14 percent of tier 1 capital as of December 31, 2024. The bank did not have any qualified investments located in the broader regional area.

The following are examples of qualified investments and grants in the AA:

- Several investments were bonds issued by local school districts for their respective portions of funding capital improvements to the Clinton-Essex-Warren-Washington Board of Cooperative Educational Services campus. The purpose was to enhance the campus for better educational and job training opportunities.
- One of the grants was to support the construction of four single family homes for low- and moderate-income families.

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

**Extent to Which the Bank Provides Community Development Services**

CNB demonstrated an excellent responsiveness to CD needs in the AA, given the asset size, branch presence, and number of employees of the bank. CNB employees and members of senior management served as board members, ambassadors, treasurers, or members for 10 CD organizations during the evaluation period. The organizations collectively covered a wide range of CD activities such as providing community services targeted to low- and moderate-income individuals, supporting affordable housing for low- and moderate-income individuals, and supporting economic development by financing small businesses that are creating and retaining jobs for low- and moderate-income individuals. CNB employees and members of senior management also provided financial education to low- and moderate-income individuals at eight qualifying events during the evaluation period. For example, one bank employee provided training on how to prevent becoming a victim of fraud and how to identify and avoid scams.

## Appendix A: Scope of Examination

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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 MSA(s) and non-MSA(s) 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”.

<b>Time Period Reviewed:</b>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and consumer loans Community development loans, qualified investments, and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not applicable	Not applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>New York</b>		
NY Non MSA AA	Full-scope	Clinton and Essex counties in their entirety and two census tracts in Franklin County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Champlain National Bank	Satisfactory	Outstanding	Satisfactory
State:			
New York	Satisfactory	Outstanding	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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/assessment area.

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

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

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

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

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

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

**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

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### 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 30<sup>th</sup> 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 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

**Table 13. Assessment Area Distribution of Consumer 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 households in those geographies.

**Table 14. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/AA.

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
NY Non MSA	22	2,707	0.00	5,178	--	--	--	8.57	13.64	9.10	83.16	72.73	82.43	8.27	13.64	8.48	--	--	--
<b>Total</b>	<b>22</b>	<b>2,707</b>	<b>0.00</b>	<b>5,178</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>8.57</b>	<b>13.64</b>	<b>9.10</b>	<b>83.16</b>	<b>72.73</b>	<b>82.43</b>	<b>8.27</b>	<b>13.64</b>	<b>8.48</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
NY Non MSA	22	2,707	0.00	5,178	19.02	4.55	4.75	16.16	18.18	17.15	21.83	45.45	23.17	43.00	27.27	42.76	--	4.55	12.17
<b>Total</b>	<b>22</b>	<b>2,707</b>	<b>0.00</b>	<b>5,178</b>	<b>19.02</b>	<b>4.55</b>	<b>4.75</b>	<b>16.16</b>	<b>18.18</b>	<b>17.15</b>	<b>21.83</b>	<b>45.45</b>	<b>23.17</b>	<b>43.00</b>	<b>27.27</b>	<b>42.76</b>	<b>--</b>	<b>4.55</b>	<b>12.17</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
NY Non MSA	29	4,782	100.00	4,243	--	--	--	14.09	6.90	10.49	73.00	75.86	80.41	11.85	13.79	9.05	1.06	3.45	0.05
<b>Total</b>	<b>29</b>	<b>4,782</b>	<b>100.00</b>	<b>4,243</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>14.09</b>	<b>6.90</b>	<b>10.49</b>	<b>73.00</b>	<b>75.86</b>	<b>80.41</b>	<b>11.85</b>	<b>13.79</b>	<b>9.05</b>	<b>1.06</b>	<b>3.45</b>	<b>0.05</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY Non MSA	29	4,782	100.00	4,243	80.29	62.07	51.64	5.62	37.93	14.09	--
<b>Total</b>	<b>29</b>	<b>4,782</b>	<b>100.00</b>	<b>4,243</b>	<b>80.29</b>	<b>62.07</b>	<b>51.64</b>	<b>5.62</b>	<b>37.93</b>	<b>14.09</b>	<b>--</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
NY Non MSA	40	1,209	100.00	--	--	12.07	10.00	78.90	80.00	9.04	10.00	--	--
<b>Total</b>	<b>40</b>	<b>1,209</b>	<b>100.00</b>	<b>--</b>	<b>--</b>	<b>12.07</b>	<b>10.00</b>	<b>78.90</b>	<b>80.00</b>	<b>9.04</b>	<b>10.00</b>	<b>--</b>	<b>--</b>

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

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
NY Non MSA	40	1,209	100.00	21.39	32.50	15.48	35.00	18.64	10.00	44.49	22.50	--	--
<b>Total</b>	<b>40</b>	<b>1,209</b>	<b>100.00</b>	<b>21.39</b>	<b>32.50</b>	<b>15.48</b>	<b>35.00</b>	<b>18.64</b>	<b>10.00</b>	<b>44.49</b>	<b>22.50</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%