



PUBLIC DISCLOSURE

February 7, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Orwell
Charter Number: 228

441 Main Street
Orwell, VT 05760

Office of the Comptroller of the Currency

99 Summer Street
Suite 1400
Boston, MA 02110

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 (LMI) 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 Outstanding.

The lending test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test (LT) rating is based on The First National Bank of Orwell's ('Orwell' or 'the bank') record of performance in meeting the credit needs of the assessment area (AA) during the evaluation period through its lending activities. The evaluation period for the LT is from January 1, 2018 to December 31, 2020.
- Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable.
- A majority of the bank's sampled primary lending products are inside its AA.
- Overall, lending levels reflect excellent responsiveness to AA credit needs.
- The bank was not subject to any CRA or Fair Lending 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 loan-to-deposit (LTD) ratio is more than reasonable. The bank's quarterly LTD ratio averaged approximately 95.08 percent over the 12 quarters correlating to the LT evaluation period, January 1, 2018 to December 31, 2020. During this period, the LTD ratio ranged from a quarterly low of 76.84 percent to a high of 111.04 percent. Orwell's average LTD ratio exceeds the average of peer FDIC-insured institutions of similar size that operate within the bank's AA. Peer institutions selected reported an average quarterly LTD ratio of 82.20 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated 63.3 percent and 58.9 percent, by number and dollar amount respectively, of the sampled primary lending product (home mortgage loans) inside the delineated AA during the evaluation period. This analysis is performed at the bank level, rather than the AA level and does not include extensions of credit by affiliates that may be considered under the other performance criteria. Orwell does not have any affiliate relationships.

The table below details the bank's lending in and outside of the AA during the evaluation period:

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	13	65.0	7	35.0	20	1,236	52.8	1,105	47.2	2,341
2019	11	55.0	9	45.0	20	1,258	57.2	940	42.8	2,198
2020	14	70.0	6	30.0	20	1,431	67.2	697	32.8	2,128
Subtotal	38	63.3	22	36.7	60	3,925	58.9	2,742	41.1	6,667
Total	38	63.3	22	36.7	60	3,925	58.9	2,742	41.1	6,667

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

The First National Bank of Orwell is a nationally chartered community bank headquartered in Orwell, Vermont (VT). The bank is an independently owned institution without a holding company, offering basic loan and deposit banking services, but primarily operates as a residential real estate lender.

In addition to the main office in Orwell, VT the bank also operates a branch situated in Shoreham, VT, with both locations based in middle-income geographies. Business hours are reasonable, as each location is open from 8:30am to 4:00pm Monday through Friday, with extended hours available until 6:00pm on Fridays at both locations. The Shoreham branch also offers Saturday business hours from 8:00am to 11:00am. Both locations operate automated teller machines (ATMs) onsite, and the Shoreham branch offers drive-up window service. Orwell also offers online banking to its customers, and the bank's website, www.fnborwell.com, lists additional information related to products and services. The bank did not open or close any branches during the evaluation period.

The bank reported total assets of approximately \$83.9 million, total deposits of \$76.5 million, and net tier 1 capital of \$7.25 million as of December 31, 2020. The loan portfolio totaled \$59.6 million, or approximately 71 percent of total assets. The loan portfolio mix is displayed in the table below:

Loan Portfolio Summary by Loan Product December 31, 2020	
Loan Category	% of Gross Loans and Leases
1-4 Family Residential Mortgages	68.9
Other Real Estate (Commercial)	8.5
Construction & Development	7.7
Commercial & Industrial	5.2
Farm Loans	4.9
Consumer	3.1
Municipal Loans	1.7
Total	100

Source: Federal Deposit Insurance Corporation Call Report, December 31, 2020. Due to rounding, totals may not equal 100.0%

The bank has no financial or legal impediments in meeting the credit needs of the AA. The bank was rated 'Outstanding' using Small Bank (SB) procedures during the previous CRA performance evaluation dated January 11, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Orwell was evaluated using SB CRA evaluation procedures which includes a Lending Test that evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period for the LT covers the bank's performance from January 1, 2018 through December 31, 2020. Our conclusions as to the bank's lending performance during the evaluation period are based on a single identified primary product type, specifically 1-4 family residential mortgage loans. As indicated by the December 31, 2020, Federal Deposit Insurance Corporation (FDIC) Call Report, residential mortgages accounted for approximately 68.9 percent of the bank's overall loan portfolio.

As Orwell does not maintain any branch locations within Metropolitan Statistical Areas, the bank is not subject to the reporting requirements of the Home Mortgage Disclosure Act (HMDA). A random sample of residential mortgage loans that were originated and/or purchased during the evaluation period were selected to assess the bank's lending performance according to the CRA. Specifically, sampled loans were first used to assess the comparison of credit extended inside and outside of the AA at the bank level, and then additional loans were sampled as necessary to meet minimum sampling requirements. This resulted in a total of 79 residential mortgage loans which served as the basis for assessing the bank's distribution of credit within the AA and among borrowers of different income levels. All sampled loans were verified to source documents to ensure the accuracy and integrity of our analysis.

We compared the bank's 2018-2020 lending performance to 2015 American Community Survey (ACS) and 2020 Dun and Bradstreet (D&B) data. Peer 2020 mortgage data was used as supporting performance context, as applicable. HMDA aggregate lending and market share percentages consider only lenders that submit HMDA data. Lenders that collect, but do not submit data, are not considered in the percentages; however, we compared the bank's reported lending activity to aggregate data as part of the performance context and when conducting market share analysis, as needed. Peer 2020 deposit market share data is as of June 30, 2020 and based on information from the FDIC.

Selection of Areas for Full-Scope Review

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

The CRA requires an institution to define its AA in which it will be evaluated. Orwell has delineated a single AA, comprised of a single full-scope rating area, that meets the requirements of the regulation by

consisting of wholly-contiguous political subdivisions, contains the entirety of the customer deposit base, and does not arbitrarily exclude any low- or moderate-income census tracts. This full-scope rating area, Orwell AA, is comprised entirely of nonMSA (#99999) geographies and contains portions of the Addison (#001) and Rutland (#021) Vermont Counties, specifically the following cities/towns: Benson, Bridport, Castleton, Cornwall, Fair Haven, Hubbardton, Middlebury, Orwell, Shoreham, Sudbury, West Haven, and Whiting. As this full-scope rating area does not contain any low- or moderate-income census tracts, an assessment of the bank's geographic distribution of loans amongst low- and moderate-income geographies was not performed as such an assessment would not be considered significant.

Ratings

The bank's overall rating is based on the state of VT rating.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Vermont

CRA rating for the state of Vermont: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- Based on a full-scope review, the bank's performance in the delineated AA is considered excellent.
- The bank exhibits an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.
- There were no CRA or fair lending related complaints received by the bank or the agency during the evaluation period of January 1, 2018 through December 31, 2020.

Description of Institution's Operations in Vermont

As previously discussed, Orwell's full-scope AA is limited solely to portions of the adjacent VT Counties of Addison and Rutland, specifically containing the following six census tracts: 9607, 9608, 9609, 9623, 9636, and 9637. This full-scope AA is one contiguous region bordering New York State to the west, contains both bank branches and the entirety of the customer deposit base, and consists of wholly-contiguous political subdivisions, namely the following cities/towns: Benson, Bridport, Castleton, Cornwall, Fair Haven, Hubbardton, Middlebury, Orwell, Shoreham, Sudbury, West Haven, and Whiting. We noted that this rating area does not contain any low- or moderate-income geographies as of the 2015 ACS Census update, with five of the six geographies categorized as middle-income with the remaining census tract categorized as upper-income.

The bank operates in a competitive VT market area that includes large regional banks and national home mortgage lenders. The FDIC Deposit Market Share Report, as of June 30, 2020, indicates that 23 institutions operate within VT, with Orwell ranking 20th with less than one percent of the deposit market share. People's United Bank, NA (25.62 percent); TD Bank, NA (21.72 percent); and Community Bank, NA (7.85 percent) are ranked as the top three in deposit market share, holding approximately 55.2 percent of deposits in the state. When considering just Addison and Rutland Counties, Orwell ranks ninth among 11 reporting institutions with 4.15 percent deposit market share, with the top three, People's United Bank, NA (19.94 percent); The National Bank of Middlebury (19.65 percent); and TD Bank, NA (14.78 percent) collectively holding approximately 54.4 percent of deposits in just the two counties.

Additionally, we leveraged data obtained from two community contacts in the state of VT to gain a better understanding of the local economic conditions and credit needs. Both community organizations serve affordable housing needs while also providing ancillary community needs to populations within VT, including low- and moderate-income families in Addison and Rutland Counties. Contacts noted that affordable housing, particularly for low- and moderate-income groups, is an emerging need within the area. The contacts discussed several opportunities and programs related to affordable housing and community services.

According to January 2021 Moody’s Analytics Inc data, VT’s economy has still been recovering from the past recession but had stalled during the end of 2020 because of a shrinking labor market and underperforming tourist economy. The economic recovery was also negatively impacted by the COVID-19 pandemic. VT’s economic recovery is anticipated to accelerate as populations become vaccinated; however, overall gains in the state are projected to lag both the greater New England region and the nation. Within the state, the top employers include The University of Vermont Medical Center and the University of Vermont with more than 5,500 and 3,700 employees, respectively. Other top employers include Vermont Wood Manufacturers Association, GlobalFoundries, Rutland Regional Medical Center, and Shaw’s Supermarkets Inc with total employees per employer greater than 1,600 but less than 3,700.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Orwell AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	0.0	83.3	16.7	0.0
Population by Geography	23,497	0.0	0.0	80.2	19.8	0.0
Housing Units by Geography	10,875	0.0	0.0	80.8	19.2	0.0
Owner-Occupied Units by Geography	5,921	0.0	0.0	83.1	16.9	0.0
Occupied Rental Units by Geography	2,661	0.0	0.0	81.2	18.8	0.0
Vacant Units by Geography	2,293	0.0	0.0	74.5	25.5	0.0
Businesses by Geography	2,347	0.0	0.0	88.3	11.7	0.0
Farms by Geography	244	0.0	0.0	93.0	7.0	0.0
Family Distribution by Income Level	5,360	18.5	17.7	20.2	43.6	0.0
Household Distribution by Income Level	8,582	25.3	12.9	17.2	44.6	0.0
Median Family Income Non-MSAs - VT		\$64,849	Median Housing Value			\$214,854
			Median Gross Rent			\$868
			Families Below Poverty Level			7.9%

Source: 2015 ACS and 2020 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Vermont

The OCC conducted a full-scope review of the delineated AA, which consists of six census tracts and comprises the institution's entire LT rating area.

LENDING TEST

The bank's performance under the LT in VT is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Orwell AA is considered excellent.

Distribution of Loans by Income Level of the Geography

As previously discussed, an assessment of the bank's geographic distribution of loans was not performed as the bank does not have any low- or moderate-income census tracts within the AA and such an assessment would not be considered meaningful.

Home Mortgage Loans

Refer to Table O in the state of VT 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.

Due to the lack of low- or moderate-income geographies within the AA, no assessment of the bank's geographic distribution of home mortgage loans was performed as such an assessment would not be considered meaningful.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of VT 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 borrower distribution of home mortgage loans is considered excellent.

The percentage of home mortgage loans to low-income borrowers significantly exceeded both the percentage of low-income families and aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers significantly exceeded both the percentage of moderate-income families and aggregate lending in the AA.

Responses to Complaints

There were no CRA or fair lending related complaints received by the bank or the agency during the evaluation period of January 1, 2018 through December 31, 2020.

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:	Lending Test – (01/01/2018 to 12/31/2020)	
Bank Products Reviewed:	Sampled home mortgage loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None reviewed.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Multistate Metropolitan Statistical Areas		
Orwell AA	Full-scope	<ul style="list-style-type: none"> • VT nonMSA (#99999) <ul style="list-style-type: none"> • Portions of Addison County (#001) <ul style="list-style-type: none"> • Bridport, Cornwall, Middlebury, Orwell, Shoreham, and Whiting • Portions of Rutland County (#021) <ul style="list-style-type: none"> • Benson, Castleton, Fair Haven, Hubbardton, Sudbury, and West Haven

Appendix B: Summary of State Ratings

RATINGS – The First National Bank of Orwell	
Overall Bank:	Lending Test Rating
The First National Bank of Orwell	Outstanding
State Areas:	
Vermont	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 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 investments, and branch distribution).

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

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

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

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

Metropolitan Division (MD): 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 (MSA): 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.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Orwell AA	79	8,939	100.0	696	0.0	0.0	0.0	0.0	0.0	0.0	83.1	91.1	84.3	16.9	8.9	15.7	0.0	0.0	0.0
Total	79	8,939	100.0	696	0.0	0.0	0.0	0.0	0.0	0.0	83.1	91.1	84.3	16.9	8.9	15.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Orwell AA	79	8,939	100.0	696	18.5	24.1	3.0	17.7	24.1	16.2	20.2	25.3	21.8	43.6	24.1	47.8	0.0	3.8	11.1
Total	79	8,939	100.0	696	18.5	24.1	3.0	17.7	24.1	16.2	20.2	25.3	21.8	43.6	24.1	47.8	0.0	3.8	11.1

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%