



PUBLIC DISCLOSURE

October 28, 2019

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Evans Bank, National Association
Charter Number 11583

8599 Erie Road
Angola, New York 14006

Office of the Comptroller of the Currency

5000 Brittonfield Parkway
Suite 102B
East Syracuse, New York 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 **Outstanding**.

The lending test is rated: Outstanding

The community development test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on performance in the state of New York which is marked by excellent geographic distribution of home mortgage and small business loans, excellent distribution of loans to borrowers of different incomes and businesses of different sizes, a more than reasonable loan-to-deposit ratio, and a substantial majority of lending within the assessment areas.
- The Community Development (CD) Test rating is based on performance in the state of New York with demonstrated excellent responsiveness to community development needs through community development loans, qualified investments and community development services.
- Evans Bank, National Association (EBNA) offers an affordable mortgage product geared toward low- and moderate-income borrowers with flexible underwriting criteria and up to \$2,500 in credit toward closing costs on home purchase loans and waived application fee on home refinance loans.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area (AA), the bank's loan-to-deposit ratio is more than reasonable.

The ratio was calculated using the average of loan-to-deposit ratios from the quarter following the date of the last evaluation, December 31, 2016, through December 31, 2018. During this period, EBNA's average loan-to-deposit ratio was 95.5 percent. In comparison, the ratio for six similarly situated financial institutions located in the assessment area ranged from 41.7 percent to 92.6 percent with an average of 79.3 percent during the evaluation period for all seven institutions.

Lending in Assessment Area

A substantial majority of the bank's loans are in its AAs.

EBNA originated and purchased 95.7 percent (by number) and 89.0 percent (by dollar) of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of census tract.

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	1,078	97.2	31	2.8	1,109	279,994	89.0	34,522	11.0	314,516
Small Business	1,181	94.3	71	5.7	1,252	199,894	88.8	25,095	11.2	224,989
Small Farm	2	100.0	0	0.0	2	80	100.0	0	0.0	80
Total	2,261	95.7	102	4.3	2,363	479,968	89.0	59,617	11.0	539,585

*Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0*

Description of Institution

EBNA is an intrastate community bank headquartered in Angola, New York with its administrative offices in Hamburg, New York. EBNA is a wholly-owned subsidiary of Evans Bancorp, Inc., a one bank holding company also headquartered in Angola, New York. Evans Bancorp, Inc. has a second subsidiary, Evans National Financial Services, LLC which owns The Evans Agency, LLC, a property and casualty insurance agency. The Evans Agency, LLC owns Frontier Claims Services, Inc. which provides claims adjusting services to insurance companies. EBNA's subsidiaries include Evans National Holding Corp., a real estate investment trust; Evans Capital Trust I, a statutory trust; and ENB Employers Insurance Trust, a trust company formed to hold bank-owned life insurance. This Performance Evaluation does not include or consider any activities performed or conducted by bank affiliates or subsidiaries.

EBNA and its subsidiaries offer traditional banking and services, as well as, insurance products and services. Lending activities are focused on commercial real estate lending, commercial lending and home mortgage lending. As of December 31, 2018, EBNA's assets totaled \$1.37 billion with \$1.16 billion in total loans, \$1.22 billion in deposits and \$133 million in tier 1 equity capital. Total loans consist of \$391 million or 34 percent commercial real estate loans, \$208 million or 18 percent multi-family loans, \$201 million or 18 percent commercial and industrial loans, \$178 million or 15 percent home mortgage loans, \$109 million or 9 percent construction and land development, \$64 million or 5 percent home equity lines of credit, and \$6 million or < 1 percent in other loan types (i. e. retail, municipal, etc.).

EBNA designated two assessment areas, the Buffalo MSA AA and the non-MSA AA. The Buffalo MSA AA includes the entire Buffalo-Cheektowaga-Niagara Falls, New York metropolitan statistical area (MSA) (MSA #15380) which consists of Niagara and Erie Counties in Western New York State. The Buffalo MSA AA includes 14 of the bank's 15 branches. The non-MSA AA consists of two census tracts in Cattaraugus County and four census tracts in Chautauqua County. The non-MSA AA is contiguous to the bank's Buffalo MSA AA. The non-MSA AA contains one EBNA branch. The AAs do not arbitrarily exclude any low- or moderate-income geographies.

EBNA operates in a competitive financial services market. Competitors include credit card companies, on-line mortgage lenders, large banks, credit unions, community banks and thrifts. EBNA does not have any legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

EBNA's prior Performance Evaluation dated November 14, 2016, resulted in a Satisfactory rating based on a Satisfactory Lending Test rating and an Outstanding Community Development Test rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covered January 1, 2016, through December 31, 2018, for home mortgage, small business and small farm loans. Home mortgage loans include home purchase, home improvement, home mortgage refinance loans, and multi-family loans as reported on the Loan Application Register (LAR) required by the Home Mortgage Disclosure Act (HMDA). The evaluation period for CD loans, investments and services is November 14, 2016, through December 31, 2018.

The market share and peer comparisons are based on the information contained in the aggregate HMDA information and Small Business/Farm Registers, which are available for public review. The aggregate HMDA and Small Business/Farm Registers for 2016 are used for the 2016 evaluation period comparison, the 2017 registers are used for the 2017 evaluation period comparison, and the 2018 registers are used for the 2018 evaluation period comparison. The peer comparisons in this evaluation include only lenders who were required to file HMDA data and a Small Business/Farm Register in 2016, 2017 and 2018.

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 assessment areas located within the same 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.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

EBNA's rating is based on its performance within the state of New York which consists of two assessment areas, the Buffalo MSA AA and the non-MSA AA. The Buffalo MSA AA received the heaviest weighting in the performance assessment as the AA represented more than 90 percent of the bank's branches, geographies, deposits, lending, population, housing, families and businesses. Refer to the table on the following page for more information.

	Branches	Geographies	Deposits	Lending	Population	Housing	Families	Business
Buffalo MSA AA	93%	98%	94%	99%	98%	98%	98%	99%
Non MSA AA	7%	2%	6%	1%	2%	2%	2%	1%

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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 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 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 New York

CRA rating for the State of New York: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- An excellent geographic distribution of home mortgage and small business loans.
- An excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- Excellent responsiveness to CD needs in the state of New York through CD loans, qualified investments, and CD service.

Description of Institution's Operations in New York

EBNA has two AAs within the state of New York, the Buffalo MSA AA and the non-MSA AA. The Buffalo MSA AA includes the entire Buffalo-Cheektowaga-Niagara Falls, NY MSA (MSA #15380), which consists of Niagara and Erie Counties in Western New York state. The Buffalo MSA AA includes 14 of the bank's 15 branches. The AA includes the cities of Buffalo and Niagara Falls and the surrounding suburbs.

The non-MSA AA contains one EBNA branch located in Forestville, New York in Chautauqua County. The non-MSA AA, which is mainly rural, consists of two census tracts in Cattaraugus County and four census tracts in Chautauqua County. The non-MSA AA is contiguous to the bank's Buffalo MSA AA. The four census tracts in Chautauqua County represent the following Legislative Districts in their entirety - Arkwright, Charlotte, Cherry Creek, Hanover, Sheridan, and Villenova. The two census tracts in Cattaraugus County represent a portion of Cattaraugus Territory of the Seneca Nation of Indians, the Town of Perrysburg and portions of the Towns of Dayton and Persia. The census tract boundaries do not overlap with the town boundaries reflecting the rural nature of Cattaraugus County which makes it difficult to take full political subdivisions. Management adjusted the eastern boundary of its non-MSA AA to include only the portion of the political subdivision that it could reasonably expect to serve as permitted under the regulation. The adjustment did not arbitrarily exclude any low- or moderate-income geographies.

EBNA reported \$1.19 billion in deposits as of June 30, 2018, with \$1.11 billion in the Buffalo MSA AA and \$77 million in the non-MSA AA. Competition from other financial institutions operating in the AAs and from on-line providers is strong. In the Buffalo MSA AA, EBNA competes against 15 other institutions with 241 offices and \$41.4 billion in deposits. In the Buffalo MSA AA, EBNA ranked sixth in deposits with 2.61 percent market share behind M&T Bank with 62.77 percent, KeyBank with 16.69 percent, Bank of America with 5.76 percent, Citizens Bank with 4.43 percent, and Northwest Bank with 4.30 percent. Within the non-MSA AA, EBNA competes against four institutions. However, in the larger area covering all of Cattaraugus and Chautauqua Counties, EBNA competes against 10

institutions operating 67 branches with \$2.5 billion in deposits. In Cattaraugus and Chautauqua Counties, EBNA ranked eighth in deposits with 2.96 percent market share behind Community Bank, N.A. with 30.88 percent, KeyBank with 13.69 percent, M&T Bank with 13.40 percent, Five Star Bank with 11.79 percent and Northwest Bank with 10.20 percent. Market share data for June 30, 2019, is consistent with June 30, 2018 data.

The economic climate in Erie and Niagara counties has steadily improved since the Great Recession of 2008 regaining most of the jobs lost in the aftermath of the economic decline. Unemployment (seasonally adjusted) is low at 4.0 percent as of October 2019 and consistent with the state unemployment rate of 4.0 percent. Economic recovery in the Buffalo MSA AA was somewhat spurred by New York State Governor Andrew Cuomo's \$1 billion commitment to the region initiated in 2012 which continues today. The largest industries in Erie County are health care, education and retail. The largest industries in Niagara County are health care, manufacturing and retail. Major private sector employers in the Buffalo MSA AA include health care providers Kaleida Health, Catholic Health System and Roswell Park Cancer Institute, supermarket chains Wegman's Food Markets and Tops Markets, and M&T Bank which is headquartered in Buffalo.

The economic climate in rural Cattaraugus and Chautauqua counties is improving but has not experienced the level of reinvestment noted in the Buffalo MSA AA. October 2019 unemployment rates in Chautauqua and Cattaraugus Counties are 4.2 percent and 4.4 percent, respectively, which lags the state unemployment rates. The largest industries in Cattaraugus County are health care, manufacturing and retail. The largest industries in Chautauqua County are manufacturing, health care, and education.

In June 2019, the OCC and other financial regulators attended a banking summit hosted by numerous community development organizations in the Buffalo MSA AA. The city of Buffalo is benefitting from state and local economic development initiatives. However, participants indicated rising rents and home prices and difficulty obtaining home improvement loans are making it difficult for residents to stay in the city leading to gentrification. Additionally, small businesses are having difficulty obtaining loans. The organizations indicated the need for small business and affordable home mortgage loans especially within the city of Buffalo.

During the evaluation period, an OCC representative met with a community development financial institution located in Chautauqua County that works with affordable housing organizations and organizations providing community services targeting low- and moderate-income persons. The contact noted the economic development occurring in the Buffalo MSA has had a minimal positive impact on the community. The contact noted a need for affordable housing as the current housing stock is old and costly to repair.

Buffalo MSA AA

Table A – Demographic Information of the Assessment Area							2016
Assessment Area: Buffalo MSA AA 2010 Census							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	297	12.5	20.2	41.4	23.9	2.0	
Population by Geography	1,135,509	9.6	17.0	39.0	33.2	1.2	
Housing Units by Geography	519,118	12.0	19.4	38.9	29.7	0.0	
Owner-Occupied Units by Geography	312,759	5.0	14.2	43.1	37.7	0.0	
Occupied Rental Units by Geography	153,473	20.1	26.7	35.0	18.3	0.0	
Vacant Units by Geography	52,886	29.8	28.7	25.7	15.8	0.0	
Businesses by Geography	62,374	8.0	14.5	41.0	36.0	0.4	
Farms by Geography	1,704	2.6	5.5	50.2	41.6	0.0	
Family Distribution by Income Level	287,669	21.6	17.4	20.9	40.1	0.0	
Household Distribution by Income Level	466,232	25.2	15.6	17.0	42.2	0.0	
Median Family Income MSA - 15380 Buffalo-Cheektowaga-Niagara Falls, New York MSA		\$62,530	Median Housing Value			\$113,014	
			Median Gross Rent			\$670	
			Families Below Poverty Level			10.0%	
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>							

Table A – Demographic Information of the Assessment Area						2017-2018
Assessment Area: Buffalo MSA AA 2015 ACS Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	297	15.5	18.2	40.1	23.6	2.7
Population by Geography	1,135,734	12.7	13.5	40.0	32.5	1.3
Housing Units by Geography	519,952	14.3	15.0	40.6	29.9	0.2
Owner-Occupied Units by Geography	311,183	6.9	11.4	43.8	37.9	0.0
Occupied Rental Units by Geography	159,470	23.9	19.7	37.1	18.9	0.4
Vacant Units by Geography	49,299	29.7	22.7	32.0	15.1	0.5
Businesses by Geography	63,037	9.1	12.2	37.9	37.2	3.6
Farms by Geography	1,812	3.3	4.0	49.2	42.7	0.9
Family Distribution by Income Level	284,789	22.2	16.6	20.3	40.9	0.0
Household Distribution by Income Level	470,653	25.9	15.3	16.5	42.3	0.0
Median Family Income MSA - 15380 Buffalo-Cheektowaga-Niagara Falls, New York MSA		\$67,108	Median Housing Value			\$125,586
			Median Gross Rent			\$726
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Non-MSA AA

Table A – Demographic Information of the Assessment Area						2016
Assessment Area: Non MSA AA 2010 Census						
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	19,572	0.0	0.0	86.3	13.7	0.0
Housing Units by Geography	9,034	0.0	0.0	85.9	14.1	0.0
Owner-Occupied Units by Geography	6,401	0.0	0.0	84.6	15.4	0.0
Occupied Rental Units by Geography	1,434	0.0	0.0	91.5	8.5	0.0
Vacant Units by Geography	1,199	0.0	0.0	86.2	13.8	0.0
Businesses by Geography	852	0.0	0.0	86.2	13.8	0.0
Farms by Geography	137	0.0	0.0	81.8	18.2	0.0
Family Distribution by Income Level	5,377	17.8	18.7	21.6	41.9	0.0
Household Distribution by Income Level	7,835	20.2	16.3	20.2	43.3	0.0
Median Family Income Non-MSAs – New York		\$54,386	Median Housing Value			\$86,251
			Median Gross Rent			\$646
			Families Below Poverty Level			8.9%

Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						2017-2018
Assessment Area: Non MSA AA 2015 ACS Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	16.7	0.0	83.3	0.0	0.0
Population by Geography	18,969	1.8	0.0	98.2	0.0	0.0
Housing Units by Geography	9,115	1.2	0.0	98.8	0.0	0.0
Owner-Occupied Units by Geography	6,039	1.0	0.0	99.0	0.0	0.0
Occupied Rental Units by Geography	1,535	2.0	0.0	98.0	0.0	0.0
Vacant Units by Geography	1,541	1.2	0.0	98.8	0.0	0.0
Businesses by Geography	771	0.8	0.0	99.2	0.0	0.0
Farms by Geography	109	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	5,027	20.0	19.9	22.4	37.7	0.0
Household Distribution by Income Level	7,574	21.9	16.3	19.0	42.8	0.0
Median Family Income Non-MSAs – New York		\$59,570	Median Housing Value			\$89,606
			Median Gross Rent			\$673
			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in New York

Both the Buffalo MSA AA and the non-MSA AA received a full-scope review with the performance in the Buffalo MSA AA receiving the heaviest weighting given the significant percent of branches, geographies, population, deposits, lending, and businesses located in the AA. Refer to the table in appendix A for more information.

Home mortgage lending received a slightly heavier weighting over small business lending. During the evaluation period, EBNA originated two small farm loans which is an insufficient number of loans to conduct a meaningful analysis. Lending activity in the non-MSA AA is a small component of the bank's overall lending and the volume activity on an annual basis would ordinarily be too small to conduct a meaningful analysis. However, an analysis of the area is included as it was not included as a full-scope area in the prior Performance Evaluation.

In 2016, the non-MSA AA did not contain any low- or moderate-income census tracts. Additionally, in 2017 and 2018, the non-MSA AA did not contain any moderate-income census tracts. Therefore, an analysis of geographic distribution in the non-MSA AA in 2016 would not be meaningful, and the analysis of 2017 and 2018 geographic distribution focused on the one low-income tract in the AA.

The 2018 small business peer lending data was unavailable. Therefore, examiners used 2017 peer data results as a proxy to assess bank performance against aggregate peer data.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Based on a full-scope review, the bank's performance in New York is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state. The geographic distribution of loans in the Buffalo MSA AA is excellent. The geographic distribution of loans in the non-MSA AA is reasonable.

Home Mortgage Loans

Refer to Table O in the 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 geographic distribution of home mortgage loans in the Buffalo MSA AA was excellent. In 2016, 2017, and 2018, the portion of home mortgage loans made in low-income census tracts exceeded the portion of owner-occupied housing and exceeded the average for peer lenders. In 2016, 2017, and 2018, the portion of home mortgage loans made in moderate-income census tracts exceeded the portion of owner-occupied housing and exceeded the average for peer lenders.

The geographic distribution of home mortgage in the non-MSA AA was reasonable. In 2017 and 2018, EBNA did not originate or purchase any home mortgage loans in the low-income census tract. Examiners noted only 1 percent of all owner-occupied housing, or 64 units, are in the low-income tract. Additionally, all other lenders originated/purchased only one home mortgage loan in 2017 and one home mortgage loan in 2018. The low-income census tract represents a portion of Cattaraugus Territory of the Seneca Nation of Indians.

Small Loans to Businesses

Refer to Table Q in the 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 excellent.

The geographic distribution of small loans to businesses in the Buffalo MSA AA was excellent. In 2016 and 2017, the percentage of small loans to businesses made in low-income census tracts exceeded the percentage of businesses located in the census tracts and exceeded the average for peer lenders. In 2018, the percentage of small loans to businesses made in low-income census tracts was reasonable in comparison to the percentage of businesses located in the census tracts and exceeded the average for peer lenders.

In 2016, the percentage of small loans to businesses made in moderate-income census tracts exceeded the percentage of businesses located in the census tracts and exceeded the average for peer lenders. In 2017 and 2018, the percentage of small loans to businesses made in the moderate-income census tracts was reasonable in comparison to the percentage of businesses located in the census tracts and exceeded the average for peer lenders.

The geographic distribution of small loans to businesses in the non-MSA AA was reasonable. In 2017 and 2018, EBNA did not originate or purchase any small loans to businesses in the low-income census tract. Examiners noted less than one percent of all businesses, a total of six businesses, are in the low-income tract. Additionally, no other lenders originated/purchased a small loan to a business in the low-income census tract in 2017 or 2018.

Lending Gap Analysis

OCC examiners reviewed summary reports and AA maps detailing EBNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank. The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes in the Buffalo MSA AA. The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes in the non-MSA AA.

Home Mortgage Loans

Refer to Table P in the 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 borrower distribution of home mortgage loans was excellent.

The borrower distribution of home mortgage loans was excellent in the Buffalo MSA AA. In 2016 and 2017, the portion of home mortgage loans to low-income borrowers was reasonable compared to the percentage of low-income families and exceeded the average for peer lenders. In 2018, the portion of home mortgage loans to low-income borrowers exceeded the percentage of low-income families and exceeded the average for peer lenders. In 2016, 2017 and 2018, the portion of home mortgage loans to moderate-income borrowers exceeded the percentage of low-income families and exceeded the average for peer lenders.

With respect to low-income borrowers in the Buffalo MSA AA, although the bank did not meet the demographic, the peer lending data is a better indicator of loan demand from low-income borrowers. Additionally, in 2016, 2017, and 2018, EBNA's market share for loans to low-income borrowers exceeded the bank's overall market share. In 2016, EBNA ranked 16th for all home mortgage lending in the Buffalo MSA AA with 1.35 percent market share but ranked 11th for home mortgage lending to low-income borrowers in the Buffalo MSA AA with 2.39 percent market share. In 2017, EBNA ranked 17th for all home mortgage lending in the Buffalo MSA AA with 1.52 percent market share but ranked 9th for

home mortgage lending to low-income borrowers in the Buffalo MSA AA with 2.98 percent market share. In 2018, EBNA ranked 16th for all home mortgage lending in the Buffalo MSA AA with 1.35 percent market share but ranked 12th for home mortgage lending to low-income borrowers in the Buffalo MSA AA with 2.54 percent market share.

The borrower distribution of home mortgage loans was reasonable in the non-MSA AA. In 2016, 2017, and 2018, EBNA did not originate/purchase any loans to low-income borrowers. Given the median family housing value during the evaluation period which ranged from \$86,251 in 2016 to \$89,606 in 2017-2018, it would be difficult for a low-income borrower, who would earn less than \$29,450 in 2016, \$31,250 in 2017 and \$32,150 in 2018, to qualify for a home mortgage loan. In 2016, 2017 and 2018, the portion of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the average for peer lenders.

Small Loans to Businesses

Refer to Table R in the 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 was reasonable.

The borrower distribution of small loans to businesses was reasonable in the Buffalo MSA AA. In 2016, 2017, and 2018, the portion of loans to businesses with revenues of \$1 million or less was reasonable compared to the percentage of businesses in the AA and exceeded the average for peer lenders.

The borrower distribution of small loans to businesses was reasonable in the non-MSA AA. In 2016, 2017, and 2018, the portion of loans to businesses with revenues of \$1 million or less was reasonable compared to the percentage of businesses in the AA and exceeded the average for peer lenders.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

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

Number and Amount of Community Development Loans

Community Development Loans				
Assessment Area	#	%	\$ (000's)	%
Buffalo MSA AA	32*	100.00	\$76,985*	100.00
Non-MSA AA	0	0.00	\$0	0.00

*One loan for \$350 thousand was to an economic development corporation located in the Buffalo MSA AA but whose organizational activities benefits the non-MSA AA as well.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

EBNA demonstrated excellent responsiveness to community development needs through community development loans. Community development lending includes three loans totaling \$19.8 million for affordable housing, 15 loans totaling \$22.2 million to organizations providing community services targeting low- and moderate-income persons, nine loans totaling \$29.3 million to revitalize and stabilize low- and moderate-income areas and five loans totaling \$5.6 million for economic development.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Buffalo MSA AA	3	\$991	31***	\$1,491***	34	97.14	\$2,482	87.33	0	\$0
Non-MSA AA	1	\$400	0	\$0	1	2.86	\$400	12.67	0	\$0

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

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

***Three donations totaling \$26 thousand were to community development organizations located in the Buffalo MSA AA but whose organizational activities benefit the non-MSA AA as well.

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

EBNA demonstrated adequate responsiveness to community development needs through qualified investments, donations and grants. Qualified investments include a \$641 thousand investment in a company renovating a historic property in a moderate-income geography which will revitalize and stabilize, a \$547 thousand investment in a company renovating an historic property to be used as a homeless shelter, a \$200 thousand grant to two schools operating in low- and moderate-income census tracts and several donations to organizations providing community services targeting low- and moderate-income persons and/or providing affordable housing. Prior period investments include \$821 thousand in balances outstanding on mortgage-backed securities with underlying loans to low- or moderate-income borrowers in the Buffalo MSA AA and a \$400 thousand investment in a small business investment corporation with an operating area covering both AAs.

Extent to Which the Bank Provides Community Development Services

EBNA demonstrated excellent responsiveness to community development needs through community development services. In 2017 and 2018, four members of senior management, four vice presidents and three bank staff served as a director or provided financial expertise to 18 community development organizations in the Buffalo MSA AA including 10 organizations providing community services targeting low- and moderate-income persons, six affordable housing organizations and two economic development organizations.

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 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”.

Time Period Reviewed:	Lending Test: 01/01/2016 to 12/31/2018 Community Development Test: 11/14/2016 to 12/31/2018	
Bank Products Reviewed:	Home mortgage, small business and small farm Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>None</i>		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
Buffalo MSA AA	Full-scope	Erie and Niagara Counties
Non-MSA AA	Full-scope	Portions of Cattaraugus and Chautauqua Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS Evans Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Evans Bank, N. A.	Outstanding	Outstanding	Outstanding
MMSA or State:			
New York	Outstanding	Outstanding	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 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: 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.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

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
Buffalo MSA AA	324	95,883	98.8	23,954	5.0	9.3	2.5	14.3	18.5	11.0	43.1	38.6	43.8	37.7	33.6	42.7	0.0	0.0	0.0
Non-MSA AA	4	195	1.2	330	0.0	0.0	0.0	0.0	0.0	0.0	84.6	100.0	88.2	15.4	0.0	11.8	0.0	0.0	0.0
Total	328	96,078	100.0	24,284	4.9	9.1	2.4	14.0	18.3	10.9	43.9	39.3	44.4	37.2	33.2	42.3	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

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
Buffalo MSA AA	324	95,883	98.8	23,954	21.6	13.3	7.5	17.4	25.9	20.4	20.9	15.4	23.1	40.1	28.1	31.9	0.0	17.3	17.1
Non-MSA AA	4	195	1.2	330	17.8	0.0	9.4	18.7	75.0	18.8	21.6	0.0	27.6	41.9	25.0	31.2	0.0	0.0	13.0
Total	328	96,078	100.0	24,284	21.6	13.1	7.5	17.5	26.5	20.4	20.9	15.2	23.1	40.1	28.0	31.9	0.0	17.1	17.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Buffalo MSA AA	359	63,154	97.6	14,981	8.0	8.4	7.0	14.5	15.6	13.8	41.0	40.4	38.6	36.0	35.7	40.5	0.4	0.0	0.1
Non-MSA AA	9	1,011	2.4	172	0.0	0.0	0.0	0.0	0.0	0.0	86.2	77.8	78.5	13.9	22.2	21.5	0.0	0.0	0.0
Total	368	64,165	100.0	15,153	7.9	8.2	6.9	14.3	15.2	13.6	41.6	41.3	39.0	35.7	35.3	40.3	0.4	0.0	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Buffalo MSA AA	359	63,154	97.6	14,981	80.2	61.8	46.4	7.4	38.2	12.4	0.0
Non-MSA AA	9	1,011	2.4	172	80.0	66.7	43.6	5.6	33.3	14.3	0.0
Total	368	64,165	100.0	15,153	80.2	62.0	46.3	7.3	38.0	12.4	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

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
Buffalo MSA AA	351	73,020	98.3	23,152	6.9	12.3	4.5	11.4	22.2	10.2	43.8	42.5	46.2	37.9	22.8	39.0	0.0	0.3	0.0
Non-MSA AA	6	487	1.7	335	1.0	0.0	0.3	0.0	0.0	0.0	99.0	100.0	99.7	0.0	0.0	0.0	0.0	0.0	0.0
Total	357	73,507	100.0	23,487	6.7	12.0	4.4	11.2	21.8	10.1	44.9	43.4	47.0	37.2	22.4	38.5	0.0	0.3	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

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
Buffalo MSA AA	351	73,020	98.3	23,152	22.2	15.7	8.0	16.6	38.2	20.6	20.3	13.1	22.3	40.9	21.4	32.0	0.0	11.7	17.1
Non-MSA AA	6	487	1.7	335	20.0	0.0	13.4	19.9	33.3	25.1	22.4	50.0	26.9	37.7	16.7	24.5	0.0	0.0	10.1
Total	357	73,507	100.0	23,487	22.1	15.4	8.1	16.7	38.1	20.7	20.3	13.7	22.4	40.8	21.3	31.9	0.0	11.5	17.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Buffalo MSA AA	425	72,304	97.9	15,301	9.2	14.8	8.8	12.3	11.5	11.4	38.0	36.9	36.3	36.9	33.2	41.1	3.6	3.5	2.4
Non-MSA AA	9	868	2.1	180	0.6	0.0	0.0	0.0	0.0	0.0	99.4	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	434	73,172	100.0	15,481	9.1	14.5	8.7	12.2	11.3	11.3	38.8	38.2	37.0	36.4	32.5	40.7	3.5	3.5	2.3

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Buffalo MSA AA	425	72,304	97.9	15,301	80.0	59.3	49.5	7.5	40.7	12.6	0.0
Non-MSA AA	9	868	2.1	180	78.4	66.7	45.6	5.9	33.3	15.7	0.0
Total	434	73,172	100.0	15,481	79.9	59.4	49.4	7.5	40.6	12.6	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

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
Buffalo MSA AA	390	110,162	99.2	28,852	6.9	12.6	4.4	11.4	19.0	9.5	43.8	44.6	44.4	37.9	23.8	41.6	0.0	0.0	0.0
Non-MSA AA	3	247	0.8	346	1.0	0.0	0.3	0.0	0.0	0.0	99.0	100.0	99.7	0.0	0.0	0.0	0.0	0.0	0.0
Total	393	110,409	100.0	29,198	6.7	12.5	4.4	11.2	18.8	9.4	44.9	45.0	45.1	37.2	23.7	41.2	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

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
Buffalo MSA AA	390	110,162	99.2	28,852	22.2	18.2	9.7	16.6	42.6	22.7	20.3	13.3	23.5	40.9	14.1	32.3	0.0	11.8	11.8
Non-MSA AA	3	247	0.8	346	20.0	0.0	8.7	19.9	66.7	25.7	22.4	33.3	28.3	37.7	0.0	29.2	0.0	0.0	8.1
Total	393	110,409	100.0	29,198	22.1	18.1	9.7	16.7	42.7	22.7	20.3	13.5	23.6	40.8	14.0	32.3	0.0	11.7	11.7

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Buffalo MSA AA	373	62,037	98.4	--	9.1	8.6	8.8	12.2	11.5	11.4	37.9	43.7	36.3	37.2	32.4	41.1	3.6	3.8	2.4
Non-MSA AA	6	520	1.6	--	0.8	0.0	0.0	0.0	0.0	0.0	99.2	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	379	62,557	100.0	--	9.0	8.4	8.7	12.1	11.3	11.3	38.7	44.6	37.0	36.8	31.9	40.7	3.5	3.7	2.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; "--" data not available.

Due to rounding, totals may not equal 100.0

Note: Examiners used 2017 aggregate data as a proxy for 2018 aggregate data.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Buffalo MSA AA	373	62,037	98.4	--	80.1	56.6	49.5	7.4	43.4	12.5	0.0
Non-MSA AA	6	520	1.6	--	78.5	50.0	45.6	6.1	50.0	15.4	0.0
Total	379	62,557	100.0	--	80.1	56.5	49.4	7.4	43.5	12.6	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; "--" data not available.

Due to rounding, totals may not equal 100.0

Note: Examiners used 2017 aggregate data as a proxy for 2018 aggregate data.