



PUBLIC DISCLOSURE

August 1, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Bank, N.A.
Charter Number: 8531

45-49 Court Street
Canton, NY 13617

Office of the Comptroller of the Currency

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East Syracuse, NY 13057

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of Community Bank, National Association (CBNA) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Community Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the Low Satisfactory rating in the state of New York, the High Satisfactory rating in the states of Massachusetts and Vermont, and the Outstanding rating in the state of Pennsylvania.
- The Investment Test rating is based on the High Satisfactory ratings in the states of Massachusetts, New York, Pennsylvania, and Vermont.
- The Service Test rating is based on the Low Satisfactory ratings in the states of Massachusetts and New York and the High Satisfactory ratings in the states of Pennsylvania and Vermont.

Community Development

In addition to the community development (CD) loans originated in the bank’s assessment areas (AA), the bank originated a \$20.5 million line of credit to a community development financial institution (CDFI) to fund Small Business Administration (SBA) Paycheck Protection Program (PPP) loans. The CD loan helped fund PPP loans in New York and Pennsylvania.

Innovative or Flexible Lending Programs

CBNA offered innovative and flexible lending products for residential and commercial borrowers through federal government sponsored programs in all states. The bank offered affordable lending products for low- and moderate-income borrowers through the U.S. Department of Agriculture (USDA) and small businesses through the USDA, SBA, and Farm Service Agency (FSA). In addition, the bank offered loans to residential borrowers through Fannie Mae and partnered with local affordable housing

grant programs in all states. In the states of New York and Pennsylvania, the bank also offered loans to commercial borrowers through Pursuit Lending, a U.S. Department of the Treasury certified CDFI.

The bank offers a no closing cost (NCC) mortgage to provide affordable loans to all borrowers, although many low- and moderate-income borrowers take advantage of the product. The bank pays all mortgage related costs, with the borrower repaying third-party costs if the loan is paid off within three years but no mortgage related costs if the loan is paid off after three years. The program allows for up to a 97 percent loan-to-value (LTV) and uses established underwriting criteria. Loan terms range from 10 years to 30 years. During the evaluation period, CBNA originated 3,758 NCC mortgages to low- and moderate-income borrowers, or \$266.3 million, across AAs in all states.

In addition, CBNA works with several affordable housing nonprofit organizations to offer a specialized NCC mortgage product specific to low- and moderate-income borrowers called the Affordable Homeownership Grant Program. The program allows nonprofit organizations to provide grants to borrowers to cover down payments while the bank provides mortgage loans at interest rates three-eighths to five-eighths lower than the prevailing NCC mortgage rate. The bank also pays all closing costs without requiring the borrower to repay if the loan is paid off early. During the evaluation period, CBNA originated 84 Affordable Homeownership Grant loans, or \$7 million, across AAs in all states.

The bank uses specialized home lending products in rural areas in participation with the USDA through the Rural Guaranteed program. This program provides affordable lending products to low- and moderate-income borrowers in rural areas where lending opportunities are scarcer. Income restrictions limit eligibility to 115 percent of the median household income dependent on the county. Terms include up to 100 percent LTV and a minimum credit score of 640. During the evaluation period, CBNA originated 51 USDA Rural Guaranteed Program loans, or \$5.6 million, across AAs in all states.

CBNA uses specialized mortgage lending in participation with Fannie Mae's HomeReady Mortgage Program to provide affordable loans to low- and moderate-income borrowers. Eligibility requirements for a borrower to participate in the program include an income of 80 percent or less of the area median income and up to a 97 percent LTV, although loans over 90 percent LTV require private mortgage insurance. Borrowers need a minimum credit score of 620, and borrowers with credit scores over 680 may receive better interest rates. During the evaluation period, CBNA originated six HomeReady Mortgages, or \$519,115, across the AAs in all states.

The bank works with the SBA to provide affordable loans to small businesses through the SBA 7(a) program, which provides loan guarantees on loans up to \$5 million to qualifying businesses under the SBA small business definition. Program terms include guaranteeing 85 percent of loans less than \$150,000 and 75 percent of loans greater than \$150,000. Terms also prohibit certain fees and institute a maximum interest rate. During the evaluation period, the bank originated 52 SBA 7(a) loans, or \$8.4 million, across AAs in all states.

In response to the COVID-19 pandemic, CBNA participated as a lender in the SBA PPP. The PPP was implemented to encourage businesses to keep employees on payrolls during the initial lockdowns of the COVID-19 pandemic. Loans originated under the program carried an interest rate of 1 percent and had a maturity of two years if originated prior to June 5, 2020, and five years if originated after that date. The SBA forgave the loans if a business met certain requirements such as spending at least 60 percent of proceeds on payroll costs and maintaining employee and compensation levels. There were two rounds of the PPP, with the second round having stricter eligibility to target small businesses most affected by the

COVID-19 pandemic's economic impact. CBNA participated in both rounds of the PPP. During the evaluation period, CBNA originated 5,465 PPP loans, or \$674.4 million, across AAs in all states.

CBNA provides bridge financing for borrowers that obtain SBA 504 loans through Pursuit Lending. Borrowers are required to obtain a bridge loan prior to obtaining a loan from Pursuit Lending to contribute to their main loan. Pursuit Lending then pays off the bridge loan. Pursuit Lending operates in New York, Pennsylvania, New Jersey, and Connecticut. During the evaluation period, CBNA originated 22 bridge financing loans for Pursuit Lending borrowers, or \$24.7 million, across AAs in the states of New York and Pennsylvania.

CBNA offers family farmers and ranchers loans with government guarantees through the FSA, an agency under the USDA. The FSA provides a guarantee of up to 95 percent of loss of principal and interest on a loan. Farmers and ranchers apply to an authorized lender, which arranges the guarantee. The FSA guarantee permits lenders to make agricultural credit available to farmers who do not meet the lender's normal underwriting criteria. Maximum loan amounts are adjusted annually based on inflation and loans are subject to a maximum interest rate. During the evaluation period, CBNA originated eight FSA loans, or \$1.3 million, across AAs in all states.

Retail Services

CBNA offers traditional retail services that are consistent throughout its AAs. The bank's retail products include a free checking account called Carefree Checking that does not have monthly service charges or minimum balance requirements but requires a \$50 deposit to open. E-statements are free, but the bank charges a monthly \$2 fee for paper statements. CBNA offers a free savings account called Free Savings that does not have a minimum balance but requires a \$50 deposit to open. In addition, the bank offers free online and mobile banking, mobile deposits, bill pay, and return check images. Retail products also include a secured credit card through a relationship with the First National Bank of Omaha that allows customers to build credit.

CBNA offers services to provide access to funds for low-to-moderate income individuals who receive government assistance. All branches will cash government checks for customers and non-customers, although a nominal fee applies to cashing non-federal government or income tax refund checks for non-customers. Fees never apply when cashing a federal government check. In addition, customers and non-customers can withdraw state of New York public assistance through the Electronic Benefits Transfer Program using a CBNA automated teller machine (ATM) free of charge.

Alternative delivery systems included services such as telephone banking in English and Spanish, online banking, and mobile banking with mobile deposit. The bank does not track metrics on the alternative delivery systems to demonstrate the effectiveness in helping meet the needs of low- and moderate-income individuals or communities. As a result, the OCC did not place significant weight on alternative delivery systems when considering performance in the Service Test in any state or AA.

Lending in Assessment Areas

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

The bank originated and purchased 95.8 percent by number and 93.5 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. CBNA did not submit affiliate lending for consideration during this evaluation.

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	17,469	96.2	685	3.8	18,154	2,101,223	94.1	132,222	5.9	2,233,444	
Small Business	9,203	95.1	470	4.9	9,673	1,110,658	92.5	90,565	7.5	1,201,223	
Small Farm	861	94.4	51	5.6	912	62,824	94.0	4,022	6.0	66,846	
Total	27,534	95.8	1,206	4.2	28,739	3,274,705	93.5	226,809	6.5	3,501,513	

*Source: Bank Data during evaluation period 1/1/2019 to 12/31/2021
Due to rounding, totals may not equal 100.0%.*

Description of Institution

CBNA is a full-service interstate bank headquartered in Canton, NY and operates in New York, Pennsylvania, Massachusetts, and Vermont. CBNA executive offices are located in DeWitt, NY, a suburb of Syracuse, NY. CBNA is a wholly owned subsidiary of Community Bank System, Inc. (CBSI), a one-bank holding company. CBSI is also the sole owner of Benefit Plans Administrative Services (BPAS), Inc., a retirement and benefits plan administration and consulting firm with several subsidiaries. In addition, CBSI wholly-owns three unconsolidated subsidiary trusts for issuing mandatorily redeemable preferred securities. CBSI had total assets of \$15.6 billion as of December 31, 2021.

CBNA's operating subsidiaries had no impact on the bank's capacity to lend in the AAs where it operates. The bank's operating subsidiaries include the following: The Carta Group, Inc. (Carta Group), CBNA Preferred Funding Corporation (PFC), CBNA Treasury Management Corporation (TMC), Community Investment Services, Inc. (CISI), Nottingham Advisors, Inc. (Nottingham), OneGroup NY, Inc. (OneGroup), OneGroup Wealth Partners, Inc. (Wealth Partners), and Oneida Preferred Funding II LLC (OPFC II). OneGroup is a full-service insurance agency offering personal and commercial lines of insurance and other risk management products and services. PFC and OPFC II primarily act as investors in residential and commercial real estate activities. TMC provides cash management, investment, and treasury services to the bank. CISI, Carta Group, and Wealth Partners provide broker-dealer and investment advisory services. Nottingham provides asset management services to individuals, corporations, corporate pension and profit-sharing plans, and foundations.

CBNA is one of the largest community banks headquartered in Upstate New York. As of December 31, 2021, CBNA had 206 full-service branches and 12 standalone drive-up locations serving 61 counties spanning Upstate New York, Northeastern Pennsylvania, Vermont, and Western Massachusetts. CBNA has 12 AAs in New York, three AAs in Pennsylvania, two AAs in Vermont, and one AA in Massachusetts. The bank operates principally in smaller rural towns, villages, and cities within its market area. CBNA's primary business focus and strategy is consistent across all states and includes growing the retail line of business, mainly home mortgage lending and retail deposit products and services, as well as expanding the commercial line of business through small business and small farm lending and commercial deposit products and services.

Since the prior CRA evaluation in July 2019, CBNA continued to expand its operations in Upstate New York through acquisitions. In July 2019, CBNA acquired The Union National Bank of Kinderhook with \$642.8 million in total assets, \$568.2 million in total deposits, and 11 branches in five counties in the Capital Region of Upstate New York. In June 2020, CBNA acquired Steuben Trust Company with \$607.8 million in total assets, \$516.3 million in total deposits, and 11 branches in six counties in the Southern Tier Region of Upstate New York.

As of December 31, 2021, CBNA had \$15.3 billion in total assets that included \$7.4 billion in total loans, representing 48 percent of total assets. The bank's loan mix consisted of 42 percent residential real estate loans, 29 percent commercial real estate loans, 18 percent consumer loans, 8 percent commercial loans, 2 percent political/other loans and 1 percent agricultural loans. As of December 31, 2021, CBNA reported tier 1 capital of \$1.1 billion.

CBNA is not subject to any known financial, legal, or regulatory restrictions that would impede its ability to help meet the credit needs of its AAs.

CBNA's prior performance evaluation dated July 22, 2019, resulted in a Satisfactory rating based on a High Satisfactory rating for the Lending Test, Investment Test, and Service Test.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's performance was assessed using home mortgage, small business, and small farm loans originated and purchased during the evaluation period, which was January 1, 2019, through December 31, 2021. Performance also included an assessment of CD activities over the same period, including CD loans and services and qualified investments, grants, and donations.

Lending performance was assessed based on the bank's primary loan products. For this review, primary loan products were products in which the bank originated at least 20 loans within an AA during the evaluation period. CBNA had a sufficient volume of home mortgage and small business loans in all AAs to conduct a meaningful analysis. Small farm loans were evaluated only in the state of New York because CBNA did not originate or purchase a sufficient volume of small farm loans in any AAs in Massachusetts, Pennsylvania, or Vermont to conduct a meaningful analysis. Home Mortgage Disclosure Act (HMDA) and small business and small farm aggregate lending as well as market share percentages consider only lenders that submit HMDA and small business and small farm data. Lenders that collect but do not submit data are not considered in the percentages.

Management provided home mortgage information for 2019, 2020, and 2021 as required by HMDA. Management provided small business and small farm information for 2019, 2020, and 2021 as required by the CRA. Management did not collect or submit any consumer loan data for consideration. Examiners determined the data submitted as required by HMDA and CRA was reliable and accurate. In addition, examiners verified the management submitted CD activity data.

Selection of Areas for Full-Scope Review

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

CBNA operated in four states, Massachusetts, New York, Pennsylvania, and Vermont. New York received the most weight in the performance assessment because it represented 75.9 percent of total deposits, 78.8 percent of loan volume (by number of home mortgages, small business, and small farm loans), 73.9 percent of branches, 74.8 percent of AA census tracts, 75.1 percent of the AA population, and 70.5 percent of AA businesses. In addition, 12 of the 18 AAs are in the state of New York. Pennsylvania and Vermont carried the next most weight, with both receiving similar weighting. Pennsylvania had three AAs and represented 11 percent of total deposits, 12.9 percent of loans by number, 11.9 percent of branches, 11 percent of AA census tracts, 10 percent of AA population, and 11.1 percent of AA businesses. Vermont had 12.4 percent of total deposits, 7.9 percent of loans by number, 13.8 percent of branches, 8.9 percent of AA census tracts, 8.3 percent of AA population, and 12.8 percent of AA businesses. Massachusetts received the least weight considering the limited physical presence, deposit market share, and number of loans.

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

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans in the AA is excellent.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses of different sizes is adequate.
- The use of innovative and flexible loan products contributed positively to the bank's performance.
- The bank has an excellent level of qualified investments but through passive investments and small grants.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.
- The bank provides a significant level of CD services.

Description of Institution's Operations in Massachusetts

CBNA had one AA within the state of Massachusetts consisting of the Springfield, MA. MSA (MSA #44140) AA (Springfield MA MSA AA). The AA consisted of 95 contiguous tracks in a portion of Hampden County centered in the city of Springfield. As of December 31, 2021, CBNA operated one full-service branch equipped with an ATM. The single branch, in a low-income census tract, represented 0.5 percent of the bank's total branch network.

CBNA's strategy during the evaluation period emphasized organic loan and deposit growth as well as brand awareness due to the bank's small presence in the market and state overall. CBNA's business activities include commercial banking, retail banking, and wealth management services. Small business loans accounted for 74.5 percent of loans (based on home mortgage and small business loans) originated or purchased in Massachusetts.

The bank faces strong competition for deposits and loans in the AA. As of June 30, 2021, CBNA's total dollar volume of deposits in Massachusetts was \$46 million and represented 0.4 percent of total bank deposits. According to the FDIC Deposit Market Share Report as of June 30, 2021, the bank ranked 18th out of 18 institutions operating in Hampden County with a 0.2 percent market share of deposits. Major competitors include Bank of America, N. A., TD Bank,

N. A., Peoples Bank, Westfield Bank, and People's United Bank, N. A. During the evaluation period, CBNA originated and purchased 0.2 percent of its total home mortgage and 1.3 percent of its small business loans in the Springfield MA MSA AA.

Economic Data

According to May 2022 Moody's Analytics data, the Springfield MA MSA was in the recovery stage of the business cycle following the recession stemming from the COVID-19 pandemic. The economic recovery will most likely be longer and slower than the state and nation because of the heavy reliance on healthcare and higher education sectors. Still, the healthcare industry is expected to increase hiring in an effort to bring staffing back to pre-pandemic levels. Population growth is expected to be minimal as the Springfield MA MSA continues to suffer from out-migration of skilled youth, especially as remote work options increase.

According to the U.S. Bureau of Labor Statistics (BLS) December 2021 data, the unemployment rate (not seasonally adjusted) in the Springfield MA MSA was 4.8 percent, which was in line with the state unemployment rate of 4.6 percent. During the evaluation period, unemployment ranged from a low 3.1 percent in November 2019 to a high of 15.4 percent in April 2020 during the COVID-19 pandemic. Generally, the unemployment rate did not differ materially from the state's unemployment rate throughout the evaluation period. Per Moody's Analytics, top employers in the Springfield MA MSA were Baystate Health, MassMutual Financial Group, and Smith & Wesson. Education and health services, government and retail trade compose the top employment industries.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts conducted during the evaluation period within the Springfield MA MSA AA to determine local economic conditions and community needs. Community contacts cited opportunities for investing in and providing financial education to small businesses as the priority in the AA. In addition, housing affordability and decreasing real wages were secondary issues. The contacts noted the economic expansion before and after the COVID-19 pandemic resulted in rapidly increasing home prices but declining wages, especially in lower paying industries.

Springfield MA MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield MA MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	25.3	22.1	25.3	27.4	0.0
Population by Geography	431,749	20.9	21.5	27.4	30.3	0.0
Housing Units by Geography	175,531	20.5	22.2	28.7	28.6	0.0
Owner-Occupied Units by Geography	97,505	7.1	18.0	32.0	42.8	0.0
Occupied Rental Units by Geography	65,013	38.3	27.3	24.7	9.7	0.0
Vacant Units by Geography	13,013	31.2	28.4	23.6	16.9	0.0
Businesses by Geography	30,102	21.6	22.1	22.4	33.9	0.0
Farms by Geography	707	6.2	11.0	28.0	54.7	0.0
Family Distribution by Income Level	105,965	28.3	16.5	17.3	37.9	0.0
Household Distribution by Income Level	162,518	29.5	14.9	15.4	40.1	0.0
2015 Median Family Income (MFI) MSA – 44140 Springfield, Mass. MSA		\$67,203	Median Housing Value			\$186,473
2021 Updated MFI MSA – 44140 Springfield, Mass. MSA		\$81,300	Median Gross Rent			\$820
					Families Below Poverty Level	14.5%
<i>Source: 2015 ACS and 2021 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 Massachusetts

The OCC conducted a full-scope review of the Springfield MA MSA AA, CBNA’s only AA located in the state of Massachusetts. Small loans to businesses, which accounted for 74.5 percent of loans made in the AA during the evaluation period, were given more weight than home mortgage loans. CBNA did not originate or purchase any small farms loans in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

The bank’s performance under the Lending Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Springfield MA MSA AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Springfield MA MSA AA	40	117	0	0	158	99.4	100.0
Statewide	0	0	0	1	1	0.6	0.0

Dollar Volume (000s) of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Springfield MA MSA AA	9,083	22,714	0	0	32,617	97.5	100.0
Statewide	0	0	0	820	820	2.5	0.0

Lending levels reflect excellent responsiveness to Springfield MA MSA AA credit needs. The bank's percentile rank for both loan products is stronger than the bank's deposit percentile rank. Market share for the bank's primary product in the AA, loans to small businesses, significantly exceeded the bank's deposit market share in the AA.

Per the FDIC Deposit Market Share Report as of June 30, 2021, the bank ranked 18th out of 18 depository institutions, or the 0th percentile, with a 0.2 percent deposit market share. CBNA reported \$46.1 million in deposits in the AA.

Based on the 2021 HMDA market share data, CBNA ranked 98th out of 348 lending institutions, or the 72nd percentile, with a 0.1 percent market share, demonstrating adequate responsiveness to credit needs. The top five home mortgage lenders in the market, Rocket Mortgage, Citizens Bank, N.A., PennyMac Loan Services, LLC, Freedom Mortgage Corporation, and Polish National Credit Union, had a combined market share of 21.8 percent. Market share for the top five lenders ranged from 3.3 percent to 7.1 percent.

Based on the 2020 CRA small business loan data, the bank ranked 26th out of 99 lending institutions, or the 74th percentile, with a 0.5 percent market share, demonstrating excellent responsiveness to credit needs. The top five lenders in the market, Westfield Bank, American Express National Bank, Bank of America, N.A., Peoples United Bank, N.A., and TD Bank, N.A., had a combined market share of 44.8 percent. Market share of the top five lenders ranged from 5.5 percent to 14.6 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in both low- and moderate-income census tracts significantly exceeded both the percentage of owner-occupied housing and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Massachusetts 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 is excellent. The geographic distribution of small loans to businesses in low-income census tracts was near to both the percentage of businesses located in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income tracts significantly exceeded both the percentage of businesses located in moderate-income census tracts and aggregate lending in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CBNA's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Massachusetts 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 to individuals of different income levels is poor. The bank made no home mortgage loans to low-income individuals in the AA. Home mortgage lending to moderate-income borrowers was well below the number of moderate-income families and significantly below the aggregate lending to moderate-income families in the AA.

Small Loans to Businesses

Refer to Table R in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes is adequate. The distribution to small loans to businesses with less than \$1 million in revenue was significantly below the number of businesses with less than \$1 million in revenue and was well below aggregate lending in the AA. The conclusions considered the impact of PPP loans, which represented a significant portion of the loans originated during the evaluation period.

The assessment of the performance of small loans to businesses of different sizes was impacted by a lack of revenue information as only 53.8 percent of loans reported revenue information, which can be attributed to the bank's lending under the PPP. Management reported 55 PPP loans for \$9.2 million originated in the AA, although not all necessarily reported in CRA data. Management did not collect revenue information on PPP loans, and as a result, the bank reported a higher percentage of loans without revenue information in 2020 and 2021 (69.6 percent and 53.6 percent, respectively).

The assessment of performance also leveraged the distribution of small loans to businesses of different sizes in 2019 when all loans reported revenue information. Performance in 2019 was good.

Since management generally collects revenue information on all loans except PPP loans, the assessment of performance considered the distribution of small loans to businesses of different sizes excluding loans without reported revenue information for the evaluation period. Using this consideration, the distribution of small loans to businesses of different sizes is adequate. The distribution to small loans to businesses with less than \$1 million in revenue is well below the number of businesses with less than \$1 million in revenue and is near to aggregate lending in the AA.

In addition, the assessment of the performance also considered the size of loans. During the evaluation period, 47 percent of small loans to businesses of different sizes in the AA were less than \$100,000.

Community Development Lending

The bank made an adequate level of CD loans. The bank made no CD loans in the AA during the evaluation period. CBNA originated one loan for \$820,000 to a statewide, nonprofit quasi-public affordable housing organization outside the AA but whose mission benefits the AA. The organization finances affordable housing and helps low- and moderate-income borrowers purchase their first homes in the AA and around the state.

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.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices during the evaluation period that were responsive to AA credit needs. During the evaluation period, the bank made PPP loans to support local small businesses negatively impacted by the COVID-19 pandemic.

COVID-19 Pandemic Activities

CBNA worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic.

- CBNA provided COVID-19-related deferrals on two home mortgage loans. Management did not provide deferral information for other loan types.
- CBNA participated in the SBA PPP to support businesses impacted by the COVID-19 pandemic. During the evaluation period, CBNA originated 55 loans, or 1 percent of the bank's total PPP loans, totaling \$9.2 million in the AA.

INVESTMENT TEST

The bank's performance under the Investment Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield MA MSA AA is good.

The bank has an excellent level of qualified CD investment and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Springfield MSA AA	41	9,115	132	49,026	173	100.0	58,141	100.0	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 bank's financial reporting system.

During the evaluation period, the bank purchased 121 mortgage-backed securities (MBS) totaling \$49 million where underlying mortgage borrowers were low- or moderate-income individuals located in the AA. As of December 31, 2021, the remaining balance of 41 prior period investments, which were also MBSs, totaled \$9.1 million. The bank made grants of \$31,700 to community organizations focused on providing services in the AA to low- and moderate-income individuals.

SERVICE TEST

The bank's performance under the Service Test in Massachusetts is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield MA MSA AA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Springfield MA MSA AA	100.0	1	100.0	100.0	0.0	0.0	0.0	20.9	21.5	27.4	30.3

As of December 31, 2021, CBNA operated one branch in the Springfield MA MSA AA. The bank operated the sole branch in a low-income census tract bordering four other low-income census tracts and two moderate-income census tracts. The branch was a full-service branch with a deposit-taking ATM. The bank did not open or close any branches in the AA during the evaluation period.

Services, including business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The branch is open from 9:00 a.m. until 4:30 p.m., Monday through Thursday, with extended lobby hours on Friday until 5:00 p.m. While there are no Saturday hours, business hours are longer than most other banks in the general vicinity of the branch. In addition, the branch is in the downtown business district, which has little activity on the weekends to justify opening the branch.

Community Development Services

The bank provided a significant level of CD services. The assessment of performance considered the bank's small presence in the AA. The bank had two employees volunteer a total of 233 hours during the evaluation period to four organizations. The organizations provide CD service by providing community service activities targeted to people with low- and moderate-income, specifically disadvantaged children; activities that help to revitalize and stabilize low- and moderate-income geographic areas; and promote economic development by providing financial expertise to small businesses.

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AAs.
- The geographic distribution of loans in the AAs is adequate.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses and farms of different sizes is excellent.
- The use of innovative loan products contributed positively to the bank's performance.
- The bank has an adequate level of qualified investments but through passive investments and small grants.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.
- Services and business hours do not vary in a way that inconveniences low- and moderate-income individuals or geographies.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in New York

CBNA has 12 AAs within the state of New York consisting of the New York Non MSA AA (NY Non MSA AA), the Albany-Schenectady-Troy, NY MSA AA (Albany-Schenectady-Troy NY MSA AA) (MSA #10580), Binghamton, NY MSA AA (Binghamton NY MSA AA) (MSA #13780), Buffalo-Cheektowaga, NY MSA AA (Buffalo-Cheektowaga NY MSA AA) (MSA #15380), Elmira, NY MSA AA (Elmira NY MSA AA) (MSA #21300), Glens Falls, NY MSA AA (Glens Falls NY MSA AA) (MSA #24020), Ithaca, NY MSA AA (Ithaca NY MSA AA) (MSA #27060), Kingston, NY MSA AA (Kingston NY MSA AA) (MSA #28740), Rochester, NY MSA AA (Rochester NY MSA AA) (MSA #40380), Syracuse, NY MSA AA (Syracuse NY MSA AA) (MSA #45060), Utica-Rome, NY MSA AA (Utica-Rome NY MSA AA) (MSA #46540), and Watertown-Fort Drum, NY MSA AA (Watertown-Fort Drum NY MSA AA) (MSA #48060). The 12 AAs are contiguous and cover most of Upstate New York.

The Albany-Schenectady-Troy NY MSA AA consists of three of the five counties in the MSA—Albany, Rensselaer, and Schoharie counties. The bank excluded the other two counties in the MSA from its AA as the bank does not have a physical presence in either county. The

Binghamton NY MSA AA consists of the whole of Tioga County and part of Broome County, the two counties making up the MSA. The bank takes the 40 central and westernmost census tracts of the 55 census tracts in Broome County as the bank's physical presence does not extend to the easternmost portion of the county. The Binghamton NY MSA AA consists of entire townships in Broome County. The Buffalo-Cheektowaga NY MSA AA consists of Erie County, one of the two counties composing the MSA. The bank excludes Niagara County from its AA as the bank does not have a physical presence in the county.

The Elmira NY MSA AA consists of the whole of Chemung County, the only county in the MSA. The Glens Falls NY MSA AA consists of parts of the two counties in the MSA, Warren and Washington. Warren County consists of six of the 19 census tracts in the county, with the six census tracts located in the northern part of the county where the bank's branch is located. Washington County consists of three of 17 census tracts in the county. The three census tracts are the town where the bank's branch is located as well as two bordering towns in the northern part of the county. The Ithaca NY MSA AA consists of Tompkins County, the only county in the MSA. The Kingston NY MSA AA consists of part of Ulster County, the only county in the MSA. The three census tracts of the 47 in the county consist of the town where the bank's branch is located as well as two bordering towns in the central northwest portion of the county.

For analytical purposes, the OCC combined the 20 counties not located in MSAs within the state of New York to form the NY Non MSA AA. The counties in the NY Non MSA AA include the 18 whole counties of Allegany, Cattaraugus, Cayuga, Chautauqua, Chenango, Clinton, Columbia, Delaware, Essex, Franklin, Fulton, Lewis, Montgomery, Otsego, Schuyler, Seneca, Steuben, and St. Lawrence, and partial counties of Hamilton and Wyoming. In Cayuga and Chautauqua, the OCC included two census tracts the bank excluded from its AA for ease of analytical purposes because both census tracts were portions of Lake Ontario and Lake Erie, respectively, and were classified as not available income census tracts as they had no population, businesses, or houses. Hamilton County excludes the two southernmost census tracts as the bank's physical presence is in the northern part of the county. The three census tracts in Wyoming County are the town where the bank's branch is as well as two bordering towns in the northeast portion of the county.

The Rochester NY MSA AA consists of five of the six counties located in the MSA—Livingston, Monroe, Ontario, Wayne, and Yates counties. In Wayne County, the OCC included one census tract the bank excluded from its AA for ease of analytical purposes because the census tract was a portion of Lake Ontario and was classified as a not available income census tract as the census tract had no population, businesses, or houses. The bank excluded Orleans County from its AA as the bank does not have a physical presence in the county. The Syracuse NY MSA AA consists of the three counties in the MSA—Madison, Onondaga, and Oswego.

The Utica-Rome NY MSA consists of the Oneida County and part of Herkimer County, the two counties composing the MSA. The two census tracts in Herkimer County are in the southernmost portion of the county, where the bank has its physical presence. The AA in Herkimer County consists of entire townships. The Watertown-Fort Drum NY MSA AA consists of Jefferson County. The OCC included one census tract the bank excluded from its AA for ease of analytical purposes because the census tract was a portion of Lake Ontario and was classified as a not available income census tract as the census tract had no population, businesses, or houses.

CBNA's strategy during the evaluation period emphasized organic loan and deposit growth, but the bank's strategy included acquisitions to supplement organic growth, particularly in the NY

Non MSA AA. During the evaluation period, the bank acquired two banks with significant footprints in the NY Non MSA AA as well as the Buffalo-Cheektowaga NY MSA AA, Rochester NY MSA AA, and Albany-Schenectady-Troy NY MSA AA.

As of December 31, 2021, CBNA operated 161 branches, including 10 standalone drive-up windows, in the state of New York, which represents 73.3 percent of the bank's total branch network. The bank also operated 164 ATMs, 127 of which were deposit-taking. As of June 30, 2021, CBNA's total dollar volume of deposits in the state of New York was \$9.5 billion.

CBNA originated and purchased 82.3 percent of its total home mortgages, 70.1 percent of its small business loans, and 96.2 percent of its total small farm loans in the state of New York AAs during the evaluation period.

Buffalo-Cheektowaga NY MSA AA

As of December 31, 2021, CBNA operated five branches equipped with deposit-taking ATMs in the Buffalo-Cheektowaga NY MSA AA. None of the branches were in low- or moderate-income census tracts. The five branches accounted for 2.4 percent of the bank-wide branch network and 3.3 percent of the bank's branches in New York.

The bank faced strong competition for deposits in the Buffalo-Cheektowaga NY MSA AA. CBNA reported \$216.9 million in deposits, which represented 2.3 percent of deposits in the state of New York and 1.7 percent of the bank's total deposits, in the AA. According to the FDIC Deposit Market Share Report as of June 30, 2021, CBNA ranked 12th out of 18 depository institutions with a deposit market share of 0.3 percent. The bank's top competitors for deposit market share include M&T Bank with 63 percent, KeyBank, N.A. with 14.4 percent, HSBC Bank USA, N.A., with 5.4 percent, and Bank of America, N.A. with 4.7 percent.

Home loans accounted for 65.5 percent of loans (based on home mortgage loans, small business loans, and small farm loans) originated in the AA. Small business loans accounted for 31.3 percent of loans, and small farm loans accounted for 3.2 percent of loans in the AA.

Economic Data

According to the May 2022 Moody's Analytics report, the Buffalo-Cheektowaga, NY MSA was in the recovery phase of the business cycle but was the worst-performing large metropolitan area in New York. With the MSA's economy heavily reliant on the education and health services sectors, the COVID-19 pandemic disproportionately affected the MSA's economy. In addition, the retail sector has experienced a slow recovery in part from a slow uptake in cross-border shopping from Canadians. However, the MSA does benefit from a strong financial and insurance sector.

According to the U.S. BLS December 2021 data, the unemployment rate (not seasonally adjusted) in the Buffalo-Cheektowaga, NY MSA was 3.5 percent, which outperformed the state unemployment rate of 4.5 percent. During the evaluation period, unemployment ranged from a low of 3.5 percent in December 2021 to a high of 21.6 percent in April 2020 during the COVID-19 pandemic. Prior to the COVID-19 pandemic, the unemployment rate in the Buffalo-Cheektowaga, NY. MSA did not differ materially from the state's unemployment rate, but during the recovery following the pandemic, the MSA recovered more quickly and outperformed the state's unemployment rate. Per Moody's Analytics, the key sectors

of the economy include education and health services, government, professional and business services, and retail trade. Top employers in the Buffalo-Cheektowaga, NY MSA were Kaleida Health, M&T Bank, Catholic Health, and the University at Buffalo.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one listening session conducted with several community organizations during the evaluation period within the Buffalo-Cheektowaga NY MSA AA to determine local economic conditions and community needs. The listening session indicated the need for technical assistance for small businesses, rehabilitation of some housing stock, financing opportunities for community development projects, financial literacy training, and job training.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Buffalo-Cheektowaga NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	237	16.0	17.3	38.0	25.3	3.4
Population by Geography	921,584	13.6	13.3	37.7	33.7	1.7
Housing Units by Geography	420,782	15.1	14.8	38.7	31.2	0.2
Owner-Occupied Units by Geography	248,889	7.4	11.2	41.8	39.6	0.0
Occupied Rental Units by Geography	133,957	24.8	19.3	35.8	19.7	0.5
Vacant Units by Geography	37,936	31.7	22.7	28.4	16.6	0.6
Businesses by Geography	77,237	10.9	11.3	33.4	39.6	4.8
Farms by Geography	1,817	4.4	5.1	42.1	46.7	1.7
Family Distribution by Income Level	229,957	22.1	16.5	19.9	41.6	0.0
Household Distribution by Income Level	382,846	25.9	15.0	16.4	42.6	0.0
Median Family Income MSA - 15380 Buffalo-Cheektowaga, N.Y. MSA		\$67,108	Median Housing Value			\$130,261
2021 Updated MFI MSA – 15380 Buffalo-Cheektowaga, N.Y. MSA		\$47,800	Median Gross Rent			\$742
			Families Below Poverty Level			10.9%
<i>Source: 2015 ACS and 2021 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>						

NY Non MSA AA

CBNA operated 95 branches, including seven standalone drive-ups, in the NY Non MSA AA. In addition, the bank operated 92 ATMs in the AA, including two standalone deposit-taking ATMs and eight standalone non-deposit-taking ATMs. The NY Non MSA AA spans 20 counties covering most of Upstate New York outside of MSAs. Two of the branches are in low-income census tracts with one in Clinton County and the other in Chautauqua County. Six of the branches are in moderate-income census tracts with two in Cattaraugus County and one in each of Allegany, Delaware, Franklin, and St. Lawrence counties.

The bank faced moderate competition in the NY Non MSA AA. CBNA reported \$5.8 billion in deposits in the AA. According to the FDIC Deposit Market Share Report as of June 30, 2021, CBNA ranked first out of 41 depository institutions with a deposit market share of 24.6 percent in the AA. The bank's top competitors for deposit market share include NBT Bank, N.A. with 15.9 percent, KeyBank, N.A. with 14.8 percent, and Five Star Bank with 10.8 percent.

Home loans accounted for 68.9 percent of loans (based on home mortgage loans, small business loans, and small farm loans) originated in the AA. Small business loans accounted for 27.2 percent of loans, and small farm loans accounted for 3.9 percent of loans in the AA.

Economic Data

The NY Non MSA AA includes whole or parts of counties in parts of the Capital, Central, Finger Lakes, Mohawk Valley, North Country, Southern Tier, and Western regions of the state of New York. Parts of the Capital, Mohawk, and North Country regions make up Adirondack Park, which spans six million acres consisting of state- and privately-owned lands that have tight controls on land usage. Key economic drivers of the Adirondack Park include forestry, agriculture, hospitality, healthcare, and education. CBNA has a presence in all but one county that make up the Adirondack Park.

The other regions are primarily rural with small towns and a few more heavily populated areas spread throughout each county. Throughout the other regions key economic drivers are consistent and include forestry, agriculture, hospitality, recreation, healthcare, and education.

According to December 2021 U.S. BLS data, unemployment rates (not seasonally adjusted) in the AA ranged from a low of 2.3 percent in Columbia County to a high of 4.1 percent in Hamilton County. As of the same report, all counties in the AA had lower unemployment rates than the state of New York's 4.5 percent.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from four community contacts conducted during the evaluation period within the NY Non MSA AA to determine local economic conditions and community needs. The community contacts were several different community organizations that served nearly every part of the NY Non MSA AA footprint. One community contact reviewed was a CDFI focused on serving small businesses in the Adirondack Park. The community contact noted a need for financing for start-ups and existing businesses owned by historically disadvantaged groups. Another community contact was an organization that provides affordable housing solutions to low- and moderate-income individuals in Clinton County. The contact noted the primary needs are affordable housing, specifically the number of units and financing of affordable housing, throughout the county and infrastructure supporting housing in rural parts of the county. The third and fourth community contacts both supported several counties in the Southern Tier and Mohawk Valley regions of Upstate New York, particularly Otsego County. The third community contact noted a need for affordable housing as well as assistance and financial counseling for first-time home buyers and low- and moderate-income borrowers. The fourth community contact noted a need for financing community development projects that support low- and moderate-income individuals.

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	314	2.5	9.6	71.7	13.7	2.5
Population by Geography	1,140,221	1.7	9.6	74.8	12.7	1.2
Housing Units by Geography	580,890	1.7	9.2	76.5	12.6	0.0
Owner-Occupied Units by Geography	321,395	0.7	7.5	78.7	13.0	0.0
Occupied Rental Units by Geography	128,972	4.5	16.4	67.1	11.9	0.1
Vacant Units by Geography	130,523	1.1	6.3	80.4	12.1	0.1
Businesses by Geography	71,753	2.8	10.3	70.2	16.5	0.2
Farms by Geography	5,217	0.2	4.3	82.1	13.4	0.0
Family Distribution by Income Level	286,493	21.4	17.9	21.6	39.1	0.0
Household Distribution by Income Level	450,367	24.8	16.1	18.1	41.0	0.0
Median Family Income NY Non MSAs		\$59,570	Median Housing Value			\$113,782
2021 Updated MFI NY Non MSAs		\$69,400	Median Gross Rent			\$693
			Families Below Poverty Level			11.4%
<i>Source: 2015 ACS and 2021 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>						

Rochester NY MSA AA

CBNA operated 18 branches in the Rochester NY MSA AA. None of the branches were in low-income census tracts. Six of the branches were in moderate-income census tracts, including three in Ontario County, two in Wayne County, and one in Livingston County. The 18 branches accounted for 8.3 percent of the bank's overall branch network and 11.2 percent of branches in the state of New York.

The bank faced strong competition for deposits in the AA. CBNA reported \$912.9 million in deposits in the Rochester NY MSA AA. According to the FDIC Deposit Market Share Report as of June 30, 2021, CBNA ranked ninth out of 18 depository institutions with a deposit market share of 3.6 percent. The bank's top competitors for deposit market share include M&T Bank with 20.9 percent, KeyBank, N.A. with 14.8 percent, JPMorgan Chase Bank, N.A. with 13.5 percent, and The Canandaigua National Bank and Trust Company with 13.1 percent.

Home loans accounted for 61.3 percent of loans (based on home mortgage loans, small business, loans, and small farm loans) originated in the AA. Small business loans accounted for 29.9 percent of loans, and small farm loans accounted for 8.8 percent of loans in the AA.

Economic Data

According to the May 2022 Moody's Analytics report, the Rochester, NY MSA was in the recovery phase of the business cycle. With a heavy reliance on education and health services, the economy has underperformed. Still the reliance on the education sector offered a high economic

floor, providing the MSA with stability and support of high-wage jobs from educational institutions and a highly educated workforce. The area benefits from relatively affordable housing but, like other Upstate cities, suffers from population stagnation and out-migration.

According to the U.S. BLS December 2021 data, the unemployment rate (not seasonally adjusted) in the Rochester, NY MSA was 3 percent, which outperformed the state unemployment rate of 4.5 percent. During the evaluation period, unemployment ranged from a low of 3 percent in December 2021 to a high of 16.5 percent in April 2020 during the COVID-19 pandemic. Prior to the COVID-19 pandemic, the unemployment rate in the Rochester, NY MSA did not differ materially from the state's unemployment rate, but during the recovery following the pandemic, the MSA recovered more quickly and outperformed the state's unemployment rate. Per Moody's Analytics, the key sectors of the economy include education and health services, government, professional and business services, and manufacturing. Top employers in the Rochester, NY MSA were the University of Rochester, Rochester Regional Health System, Wegmans Food Markets, Inc, and Paychex, Inc.

Community Contacts

The OCC reviewed information from one community contact and a listening session with several community organizations during the evaluation period to determine local economic conditions and community needs. The community contact noted a need for workforce development, better access to higher-paying jobs, and housing and childcare subsidies. The listening session indicated similar needs as well as small business counseling and incentives.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	260	16.9	16.2	40.8	23.5	2.7
Population by Geography	1,040,952	9.4	13.8	46.6	29.3	0.9
Housing Units by Geography	455,059	9.9	14.7	48.1	27.3	0.1
Owner-Occupied Units by Geography	277,920	3.5	11.0	51.9	33.5	0.0
Occupied Rental Units by Geography	136,523	20.3	21.3	39.4	18.8	0.1
Vacant Units by Geography	40,616	18.3	17.9	51.1	12.6	0.1
Businesses by Geography	82,819	9.7	12.5	43.1	34.5	0.2
Farms by Geography	2,859	2.2	7.8	64.7	25.4	0.0
Family Distribution by Income Level	258,058	21.7	17.0	19.8	41.5	0.0
Household Distribution by Income Level	414,443	24.2	16.0	17.3	42.4	0.0
Median Family Income MSA - 40380 Rochester, N.Y. MSA		\$67,757	Median Housing Value			\$131,977
2021 MFI MSA - 40380 Rochester, N.Y. MSA		\$82,900	Median Gross Rent			\$814
					Families Below Poverty Level	10.3%
<i>Source: 2015 ACS and 2021 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>						

Syracuse NY MSA AA

CBNA operated 14 branches in the Syracuse NY MSA AA. In addition, the bank operated 18 ATMs in the AA, including two standalone deposit-taking ATMs and two standalone non-deposit-taking ATMs. None of the branches were in a low-income census tract, and five branches were in moderate-income census tracts, including three in Oswego County and two in Madison County.

The bank faced strong competition for deposits in the Syracuse NY MSA AA. According to the FDIC Deposit Market Share report as of June 30, 2021, CBNA's total dollar volume of deposits in the Syracuse NY MSA AA was \$1.1 billion and accounted for 8.7 percent of total bank deposits. The bank ranked sixth out of 15 depository institutions operating in the Syracuse NY MSA AA with a market share of 6.6 percent. Major competitors for deposit market share include M&T Bank with 25.5 percent, KeyBank, N.A. with 19.1 percent, JPMorgan Chase Bank, N.A. with 9.8 percent, Bank of America, N.A. with 8.9 percent, and NBT Bank, NA with 7.2 percent.

Home loans accounted for 62.7 percent of loans (based on home mortgage loans, small business loans, and small farm loans) originated in the AA. Small business loans accounted for 35.8 percent of loans, and small farm loans accounted for 1.5 percent of loan in the AA.

Economic Data

According to the May 2022 Moody's Analytics report, the Syracuse, NY MSA was in the recovery phase of the business cycle. With a reliance on education and healthcare, the economy underperformed relative to the state and the nation. Other industries like retail and leisure and hospitality have performed better. The MSA benefited from relatively affordable housing and stabilizing higher education and defense sector presences. However, the MSA experienced stagnant population growth.

According to the U.S. BLS December 2021 data, the unemployment rate (not seasonally adjusted) in the Syracuse, NY MSA was 3.1 percent, which outperformed the state unemployment rate of 4.5 percent. During the evaluation period, unemployment ranged from a low of 3.1 percent in December 2021 to a high of 17.9 percent in April 2020 during the COVID-19 pandemic. Prior to the COVID-19 pandemic, the unemployment rate in the Syracuse, NY MSA did not differ materially from the state's unemployment rate, but during the recovery following the pandemic, the MSA recovered more quickly and outperformed the state's unemployment rate. Per Moody's Analytics, the low unemployment rate is more so the result of weaker labor force growth than strong hiring. The key sectors of the economy include education and health services, government, professional and business services, and retail trade. The top employers in the Syracuse, NY MSA were Upstate Medical University, St. Joseph's Health, Oneida Indian Nation Enterprises, and Syracuse University.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts conducted during the evaluation period within the Syracuse NY MSA AA to determine local economic conditions and community needs. One community contact that focused on improving the housing stock of low- and moderate-income census tracts noted a need for home improvement loans to remediate the housing stock from potential hazards such as lead and asbestos. Another community contact focused on affordable housing noted flexibility was needed in providing financing to low- and moderate-income borrowers.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Syracuse NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	186	12.4	18.8	40.9	24.7	3.2
Population by Geography	661,914	9.3	16.7	45.4	27.2	1.3
Housing Units by Geography	289,354	9.0	18.4	46.2	25.5	0.9
Owner-Occupied Units by Geography	172,959	2.6	14.0	51.7	31.6	0.1
Occupied Rental Units by Geography	83,270	19.1	26.5	35.5	16.2	2.7
Vacant Units by Geography	33,125	16.6	21.4	44.6	16.7	0.7
Businesses by Geography	50,051	8.1	14.0	42.4	33.3	2.2
Farms by Geography	1,703	2.0	12.7	50.9	33.8	0.6
Family Distribution by Income Level	160,300	21.8	17.2	20.4	40.6	0.0
Household Distribution by Income Level	256,229	24.9	15.6	17.4	42.1	0.0
Median Family Income MSA - 45060 Syracuse, N.Y. MSA		\$68,468	Median Housing Value			\$124,267
2021 MFI MSA - 45060 Syracuse, N.Y. MSA		\$80,500	Median Gross Rent			\$766
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS and 2021 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.</i>						

Public Comment Letter

In addition to the community contacts in the state of New York, the OCC reviewed a public comment letter received in conjunction with the CRA evaluation. The authors were from a nonprofit legal services organization providing services to 14 counties in the Western, Southern Tier, and Finger Lakes regions of Upstate New York, specifically counties in the NY Non MSA AA and Rochester NY MSA AA. The authors indicated several issues facing rural borrowers including credit access for low-income rural communities; poor credit history and the lack of alternatives for credit scoring; branch closures; and predatory lending from subprime lenders, particularly in automobile lending and land contract agreements. In response to these issues, the authors provided potential innovative and flexible underwriting criteria, products, and programs that would possibly address the underlying concerns. In addition, the authors provided information on the bank's CRA performance, including maps and income analysis, but the OCC did not place significant consideration on the information as it was for a different timeframe (2018 to 2020) than the evaluation period.

Scope of Evaluation in New York

The OCC conducted full-scope reviews of the Buffalo-Cheektowaga NY MSA AA, NY Non MSA AA, Rochester NY MSA AA, and Syracuse NY MSA AA. The OCC conducted limited-scope reviews of the Albany-Schenectady-Troy NY MSA AA, Binghamton NY MSA AA, Elmira NY MSA AA, Glens Falls NY MSA AA, Ithaca NY MSA AA, Kingston NY MSA AA, Utica-Rome NY MSA AA, and Watertown-Fort Drum NY MSA AA. The four full-scope AAs accounted for 84.3 percent of deposits,

82.3 percent of total loans, and 82 percent of branches in the state of New York. The NY Non MSA AA received the highest weighting as it represented 60.9 percent of the state's deposits, 57.4 percent of the state's total loans, and 59 percent of the state's branches. The additional AAs were selected to perform a comprehensive evaluation of the bank's CRA performance in the state of New York.

Home mortgage loans, which accounted for 66.4 percent of loans made in the state's AAs during the evaluation period, were given more weight than small business loans and small farm loans, which represented 29.8 percent and 3.8 percent of the bank's lending, respectively, in the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the NY Non MSA AA and the Syracuse NY MSA AA are good. Based on full-scope reviews, the Buffalo-Cheektowaga NY MSA AA and the Rochester NY MSA AA are adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The assessment of performance considered the percentile ranking and market shares compared to competitors in its AAs. The bank's performance is stronger for its loan products than its deposits for percentile rankings and market shares.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<i>Full-Scope AAs</i>							
Buffalo-Cheektowaga NY MSA AA	593	284	29	5	911	4.0	2.3
NY Non MSA AA	8,521	3,358	485	54	12,418	54.8	60.9
Rochester NY MSA AA	1,377	672	192	5	2,246	9.9	9.6
Syracuse NY MSA AA	2,381	789	34	19	3,223	14.2	11.5
<i>Limited-Scope AAs</i>							
Albany-Schenectady-Troy NY MSA AA	180	280	3	11	474	2.1	1.9
Binghamton NY MSA AA	188	77	16	1	282	1.2	0.9
Elmira NY MSA AA	205	61	3	3	272	1.2	0.9
Glens Falls NY MSA AA	75	38	0	0	113	0.5	0.9
Ithaca NY MSA AA	95	13	1	0	109	0.5	0.1
Kingston NY MSA AA	40	19	1	0	60	0.3	0.6
Utica-Rome NY MSA AA	759	383	27	5	1,174	5.2	4.1
Watertown-Fort Drum NY MSA AA	884	441	31	3	1,359	6.0	6.4
Statewide	0	0	0	1	1	0.0	0.0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume (000s) of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<i>Full-Scope AAs</i>							
Buffalo-Cheektowaga NY MSA AA	101,292	39,886	3,332	28,961	173,471	6.8	2.3
NY Non MSA AA	887,278	345,772	32,907	19,525	1,285,482	50.5	60.9
Rochester NY MSA AA	127,546	58,110	17,410	15,492	218,558	8.6	9.6
Syracuse NY MSA AA	158,546	90,939	2,151	9,881	261,517	10.3	11.5
<i>Limited-Scope AAs</i>							
Albany-Schenectady-Troy NY MSA AA	61,232	59,600	37	71,187	192,056	7.5	1.9
Binghamton NY MSA AA	17,830	10,688	698	480	29,696	1.2	0.9
Elmira NY MSA AA	19,772	8,226	156	42	28,196	1.1	0.9
Glens Falls NY MSA AA	8,800	1,834	0	0	10,634	0.4	0.9
Ithaca NY MSA AA	13,301	1,698	75	0	15,074	0.6	0.1
Kingston NY MSA AA	6,241	1,074	8	0	7,323	0.3	0.6
Utica-Rome NY MSA AA	115,225	40,625	1,172	3,571	160,593	6.3	4.1
Watertown-Fort Drum NY MSA AA	108,311	47,276	3,389	2,752	161,728	6.4	6.4
Statewide	0	0	0	1,318	1,318	0.1	0.0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Buffalo-Cheektowaga NY MSA AA

Lending levels reflect excellent responsiveness to Buffalo-Cheektowaga NY MSA AA credit needs.

Per the FDIC Deposit Market Share Report as of June 30, 2021, the bank ranked 12th out of 18 depository institutions, or the 33rd percentile, with a 0.3 percent market share. CBNA reported \$216.9 million in deposits in the AA.

Based on the 2021 HMDA market share data, CBNA ranked 24th out of 279 lending institutions, or the 91st percentile, with a 0.8 percent market share, demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders in the market, M&T Bank, Rocket Mortgage, KeyBank, N.A., Citizens Bank, N.A., and Premium Mortgage Corporation had a combined market share of 44.8 percent. Market share for the top five lenders ranged from 5.4 percent to 16.9 percent.

Based on the 2020 CRA small business loan data, the bank ranked 20th out of 129 lending institutions, or the 84th percentile, with a 0.6 percent market share, demonstrating excellent responsiveness to credit needs. The top five lenders in the market, M&T Bank, KeyBank, N.A., American Express National Bank, Evans Bank, N.A., and Bank of America, N.A., had a combined market share of 58 percent. Market share for the top five lenders ranged from 6.8 percent to 19.8 percent.

Based on the 2020 CRA small farm loan data, the bank ranked fifth out of 16 lending institutions, or the 69th percentile, with a 10.9 percent market share, demonstrating excellent responsiveness to credit needs. CBNA and the other top four lenders in the market, Wells Fargo, N.A., Bank of Castile, KeyBank, N.A., and John Deere Financial FSB, had a combined market share of 72.9 percent. Market share for the top five lenders ranged from CBNA's 10.9 percent to 20.9 percent.

NY Non MSA AA

Lending levels reflect excellent responsiveness to NY Non MSA AA credit needs.

Per the FDIC Deposit Market Share Report as of June 30, 2021, the bank ranked first out of 41 depository institutions, or the 100th percentile, with a 24.6 percent market share. CBNA reported \$5.8 billion in deposits in the AA.

Based on the 2021 HMDA market share data, CBNA ranked first out of 366 lending institutions, or the 100th percentile, with a 12.1 percent market share, demonstrating excellent responsiveness to credit needs. CBNA and the other top four lenders in the market, Rocket Mortgage, KeyBank, N.A., Wells Fargo, N.A., and Homestead Funding Corp., had a combined market share of 35.3 percent. Market share for the top five lenders ranged from 4 percent to CBNA's 12.1 percent.

Based on the 2020 CRA small business loan data, the bank ranked second out of 155 lending institutions, or the 99th percentile, with a 9.6 percent market share, demonstrating excellent responsiveness to credit needs. CBNA and the other top four lenders in the market, American Express National Bank, KeyBank, N.A., Synchrony Bank, and NBT Bank, N.A., had a combined market share of 42.8 percent. Market share for the top five lenders ranged from 6.2 percent to 13.6 percent.

Based on the 2020 CRA small farm loan data, the bank ranked first out of 30 lending institutions, or the 100th percentile, with an 18 percent market share, demonstrating excellent responsiveness to credit needs. CBNA and the other top four lenders in the market, John Deere Financial FSB, Bank of Castile, Wells Fargo, N.A., and NBT Bank, N.A., had a combined market share of 68 percent. Market share for the top five lenders ranged from 9.2 percent to CBNA's 18 percent.

Rochester NY MSA AA

Lending levels reflect good responsiveness to AA credit needs.

Per the FDIC Deposit Market Share Report as of June 30, 2021, the bank ranked ninth out of 18 depository institutions, or the 50th percentile, with a 3.6 percent market share. CBNA reported \$912.9 million in deposits in the AA.

Based on the 2021 HMDA market share data, CBNA ranked 15th out of 273 lending institutions, or the 95th percentile, with a 1.5 percent market share, demonstrating good responsiveness to credit needs. The top five home mortgage lenders in the market, ESL Federal Credit Union, Premium Mortgage Corporation, Rocket Mortgage, Wells Fargo, N.A., Homestead Funding Corp., had a combined market share of 42 percent. Market share for the top five lenders ranged from 5.4 percent to 16.9 percent.

Based on the 2020 CRA small business loan data, the bank ranked 14th out of 146 lending institutions, or the 90th percentile, with a 1.5 percent market share, demonstrating good responsiveness to credit needs. The top five lenders in the market, Canandaigua National Bank and Trust Company, American Express National Bank, M&T Bank, JP Morgan Chase Bank, N.A., and KeyBank, N.A., had a combined market share of 60.8 percent. Market share for the top five lenders ranged from 5.8 percent to 21.6 percent.

Based on the 2020 CRA small farm loan data, the bank ranked second out of 18 lending institutions, or the 89th percentile, with a 19.3 percent market share, demonstrating excellent responsiveness to credit

needs. CBNA and the other top four lenders in the market, John Deere Financial FSB, Bank of Castile, Wells Fargo, N.A., and JP Morgan Chase Bank, N.A., had a combined market share of 78.7 percent. Market share for the top five lenders ranged from 7.3 percent to 26 percent.

Syracuse NY MSA AA

Lending levels reflect adequate responsiveness to AA credit needs.

Per the FDIC Deposit Market Share Report as of June 30, 2021, the bank ranked sixth out of 15 depository institutions, or the 60th percentile, with a 6.6 percent market share. CBNA reported \$1.1 billion in deposits in the AA.

Based on the 2021 HMDA market share data, CBNA ranked ninth out of 245 lending institutions, or the 96th percentile, with a 2.7 percent market share, demonstrating adequate responsiveness to credit needs. The top five home mortgage lenders in the market, Empower FCU, Rocket Mortgage, Wells Fargo, N.A., Paragon Home Loans, Inc., and M&T Bank, had a combined market share of 35.4 percent. Market share for the top five lenders ranged from 4.1 percent to 13.5 percent.

Based on the 2020 CRA small business loan data, the bank ranked 12th out of 129 lending institutions, or the 91st percentile, with a 3 percent market share, demonstrating adequate responsiveness to credit needs. The top five lenders in the market, M&T Bank, American Express National Bank, KeyBank, N.A., JP Morgan Chase Bank, N.A., and Pathfinder Bank, had a combined market share of 50.3 percent. Market share for the top five lenders ranged from 5.8 percent to 14.3 percent.

Based on the 2020 CRA small farm loan data, the bank ranked fifth out of 13 lending institutions, or the 62nd percentile, with a 10.3 percent market share, demonstrating good responsiveness to credit needs. CBNA and the other top four lenders in the market, KeyBank, N.A., John Deere Financial FSB, NBT Bank, N.A., and Wells Fargo, N.A., had a combined market share of 76.4 percent. Market share for the top five lenders ranged from CBNA's 10.3 percent to 17.8 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in the state of New York is adequate.

Buffalo-Cheektowaga NY MSA AA

The geographic distribution of home mortgage loans is poor. The geographic distribution of home mortgages to low- and moderate-income census tracts was significantly below the percentage of owner-occupied housing in low- and moderate-income census tracts and aggregate lending in the AA.

The assessment of performance considered the timing of the bank's June 2020 expansion in the AA and the effects of the COVID-19 pandemic on operations and the bank's ability to penetrate new markets during the height of COVID-19 restrictions in New York.

NY Non MSA AA

The geographic distribution of home mortgage loans is adequate. The geographic distribution of home mortgage loans to low-income census tracts was significantly below the percentage of owner-occupied housing and well below the aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts was below the percentage of owner-occupied housing and near to the aggregate lending in the AA. The assessment of performance considered the percentage of owner-occupied housing in the low-income census tracts versus the moderate-income census tracts, as the number of owner-occupied houses in moderate-income census tracts composed a greater percentage of the total number of owner-occupied houses in the AA. In addition, the assessment of performance compared the bank's market share in the low-income census tracts and moderate-income census tracts compared to the bank's overall market share in the AA.

The AA has eight low-income census tracts, with six of the low-income census tracts located in three cities that are heavily banked. The remaining two low-income census tracts are a prison and a reservation. Based on 2021 HMDA market share data, CBNA was sixth out of 63 lenders for home mortgage loans in low-income census tracts with 3.8 percent of the market share, which was poor compared to the overall market share of 12.1 percent in the AA. CBNA has 30 moderate-income census tracts in the AA. In the moderate-income census tracts, the bank was first out of 146 lenders for home mortgage loans with a market share of 11.1 percent, which was good compared to its overall market share. In addition, the assessment also considered the number of owner-occupied housing units in the low-income census tracts compared to moderate-income census tracts in the AA. The low-income census tracts in the AA had only 2,250 owner-occupied housing units compared to the 24,105 owner-occupied housing units in moderate-income census tracts.

Rochester NY MSA AA

The geographic distribution of home mortgage loans is adequate. The geographic distribution of home mortgage loans in low-income census tracts was significantly below the percentage of owner-occupied housing in low-income tracts and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income tracts significantly exceeded the percentage of owner-occupied housing in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance considered that the bank notably expanded its MSA AA by acquiring a physical presence in Monroe County at the midpoint of the evaluation period in June 2020 as well as at the height of the COVID-19 pandemic and pandemic related restrictions in New York.

Syracuse NY MSA AA

The geographic distribution of home mortgage loans is adequate. The geographic distribution of home mortgage loans in low-income census tracts was significantly below the percentage of owner-occupied housing in low-income tracts and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income tracts significantly exceeded the percentage of owner-occupied housing in moderate-income census tracts and aggregate lending in the AA.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses in the state of New York is adequate.

Buffalo-Cheektowaga NY MSA AA

The geographic distribution of small loans to businesses is poor. The geographic distribution of small loans to businesses in low-income census tracts was significantly below the small loans to businesses and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts was well below the small loans of businesses moderate-income and aggregate lending in the AA.

The assessment of performance considered the timing of the bank's June 2020 expansion in the AA and the effects of the COVID-19 pandemic on operations and the bank's ability to penetrate new markets during the height of COVID-19 restrictions in New York.

NY Non MSA AA

The geographic distribution of small loans to businesses is adequate. The geographic distribution of small loans to businesses in low-income census tracts was significantly below the small loans to businesses in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts was near to the percentage of small businesses and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of businesses in low-income census tracts compared to moderate-income census tracts. Businesses in low-income census tracts represented only 2.8 percent of non-farm businesses in the AA while businesses in moderate-income census tracts represented 10.3 percent of non-farm businesses in the AA. CBNA also faced significant competition from credit card companies and large banks in low-income tracts. In 2020, the top five lenders in low-income census tracts, KeyBank, N.A., American Express National Bank, M&T Bank, Northwest Bank, and NBT Bank, N.A., had a combined market share of 47.6 percent in those census tracts.

Rochester NY MSA AA

The geographic distribution of small loans to businesses is adequate. The geographic distribution of small loans to businesses in low-income census tracts was significantly below the percentage of owner-occupied housing and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeded the percentage of small businesses in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance considered that the bank established its physical presence in Monroe County at the midpoint of the evaluation period in June 2020 as well as at the height of the COVID-19 pandemic and pandemic related restrictions in New York.

Syracuse NY MSA AA

The geographic distribution of small loans to businesses is adequate. The geographic distribution of small loans to businesses in low-income census tracts was significantly below the percentage of owner-occupied housing and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeded the percentage of small businesses in moderate-income census tracts and aggregate lending in the AA.

Small Loans to Farms

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

The geographic distribution of small loans to farms is adequate.

Buffalo-Cheektowaga NY MSA AA

The geographic distribution of small loans to farms is poor. The bank did not originate or purchase any small loans to farms in low- or moderate-income census tracts. The assessment of performance considered the limited number of farms in low- and moderate-income census tracts, which approximated 173. As illustrated in Table S, there were no loans to farms located in low-income census tracts by the aggregate during the evaluation period and few in moderate-income census tracts.

NY Non MSA AA

The geographic distribution of small loans to farms is poor. The geographic distribution of small loans to farms in low- and moderate-income census tracts was significantly below the percentage of farms and aggregate lending in the AA. The bank did not originate or purchase any small loans to farms in low-income census tracts.

The assessment of performance in low- and moderate-income census tracts considered the limited number of farms in low-and moderate-income census tracts and AA competition. There were only 13 farms located in low-income census tracts and 225 farms located in moderate-income census tracts. According to the 2020 market share data, there were only two loans originated to farms located in low-income census tracts by all lenders in the AA. There were 50 loans to farms located in moderate-income census tracts by all lenders, with the top three lenders having a combined market share of 68 percent of loans. The top three lenders were John Deere Financial F.S.B., Wells Fargo Bank, N.A., and NBT Bank, N.A. CBNA had the fourth largest market share.

Rochester NY MSA AA

The geographic distribution of small loans to farms is adequate. The geographic distribution of small loans to farms in low-income tracts was significantly below the percentage of farms in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to farms in moderate-income tracts was near to the percentage of moderate-income tracts and below the aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of farms in low-income census tracts in the AA, which totaled approximately 63. According to the 2020 market

share data, there were no loans to farms located in low-income census tracts by any lender in the AA. The assessment of performance also considered the bank's market share in moderate-income census tracts compared to its overall market share. In moderate-income census tracts, the bank ranked third out of nine lenders, with a 10.3 percent market share.

Syracuse NY MSA AA

The geographic distribution of small loans to farms is good. The geographic distribution of small loans to farms in low-income tracts was significantly below the percentage of farms in low-income census tracts. The bank did not originate or purchase any small loans to farms in low-income census tracts in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeded the percentage of farms and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of farms in low-income census tracts in the AA, which totaled approximately 34. According to the 2020 market share data, there were no loans to farms located in low-income census tracts by any lender in the AA. The assessment of performance also concerned the bank's market share in moderate-income census tracts compared to its overall market share. In moderate-income census tracts, the bank ranked first out of 13 lenders, with a 23.8 percent market share, which exceeded its overall market share of 10.3 percent.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CBNA's home mortgage loans, small loans to businesses, and small loans to farms during the evaluation period. The OCC did not identify any conspicuous gaps in New York.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

The borrower distribution of home mortgage loans to individuals of different income levels in the state of New York is excellent.

Buffalo-Cheektowaga NY MSA AA

The borrower distribution of home mortgage loans to individuals of different income levels is good. Home mortgage lending to low-income borrowers was below the number of low-income families but exceeded aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers exceeded the number of moderate-income families and near to aggregate lending to moderate-income families in the AA.

NY Non MSA AA

The borrower distribution of home mortgage loans to individuals of different income levels is excellent. Home mortgage lending to low-income borrowers was below the number of low-income families but significantly exceeded aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers exceeded the number of moderate-income families and aggregate lending to moderate-income families in the AA.

Rochester NY MSA AA

The borrower distribution of home mortgage loans to individuals of different income levels is excellent. Home mortgage lending to low-income borrowers was somewhat below the number of low-income families but significantly exceeded aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers significantly exceeded the number of moderate-income families and aggregate lending to moderate-income families in the AA.

Syracuse NY MSA AA

The borrower distribution of home mortgage loans to individuals of different income levels is excellent. Home mortgage lending to low-income borrowers was below the number of low-income families but significantly exceeded aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers exceeded the number of moderate-income families and aggregate lending to moderate-income families in the AA.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses in the state of New York is good.

Buffalo-Cheektowaga NY MSA AA

The distribution of small loans to businesses of different sizes is good. The distribution of small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue and the aggregate lending in the AA.

The assessment of the performance of small loans to businesses of different sizes was impacted by a lack of revenue information as only 43.7 percent of loans reported revenue information, which can be attributed to the bank's lending under the PPP. Management reported 187 PPP loans originated for \$23.7 million in the AA, although not all necessarily reported in CRA data. Management did not collect revenue information on PPP loans, and as a result, the bank reported a higher percentage of loans without revenue information in 2020 and 2021 (72.3 percent and 59.2 percent, respectively).

The assessment of performance also leveraged the distribution of small loans to businesses of different sizes in 2019 when all loans reported revenue information. Performance in 2019 was good.

Since management generally collects revenue information on all loans except PPP loans, the assessment of performance considered the distribution of small loans to businesses of different sizes excluding loans

without reported revenue information for the evaluation period. Using this consideration, the distribution of small loans to businesses of different sizes is good. The distribution to small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue but exceeded the aggregate lending in the AA.

In addition, the assessment of the performance also considered the size of loans. During the evaluation period, 63 percent of small loans to businesses of different sizes in the AA were less than \$100,000.

NY Non MSA AA

The distribution of small loans to businesses of different sizes is good. The distribution of small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue but exceeded the aggregate lending in the AA.

The assessment of the performance of small loans to businesses of different sizes was impacted by a lack of revenue information as only 46 percent of loans reported revenue information, which can be attributed to the bank's lending under the PPP. Management reported 2,034 PPP loans originated for \$208.4 million in the AA, although not all necessarily reported in CRA data. Management did not collect revenue information on PPP loans, and as a result, the bank reported a higher percentage of loans without revenue information in 2020 and 2021 (68.1 percent and 61.3 percent, respectively).

The assessment of performance also leveraged the distribution of small loans to businesses of different sizes in 2019 when all loans reported revenue information. Performance in 2019 was good.

Since management generally collects revenue information on all loans except PPP loans, the assessment of performance considered the distribution of small loans to businesses of different sizes excluding loans without reported revenue information for the evaluation period. Using this consideration, the distribution of small loans to businesses of different sizes is good. The distribution to small loans to businesses with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue but exceeded the aggregate lending in the AA.

In addition, the assessment of the performance also considered the size of loans. During the evaluation period, 73.8 percent of small loans to businesses of different sizes in the AA were less than \$100,000.

Rochester NY MSA AA

The distribution of small loans to businesses of different sizes is good. The distribution of small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue but exceeded the aggregate lending in the AA.

The assessment of the performance of small loans to businesses of different sizes was impacted by a lack of revenue information as only 49.3 percent of loans reported revenue information, which can be attributed to the bank's lending under the PPP. Management reported 413 PPP loans originated for \$32.1 million in the AA, although not all necessarily reported in CRA data. Management did not collect revenue information on PPP loans, and as a result, the bank reported a higher percentage of loans without revenue information in 2020 and 2021 (64.9 percent and 54.2 percent, respectively).

The assessment of performance also leveraged the distribution of small loans to businesses of different sizes in 2019 when all loans reported revenue information. Performance in 2019 was excellent.

Since management generally collects revenue information on all loans except PPP loans, the assessment of performance considered the distribution of small loans to businesses of different sizes excluding loans without reported revenue information for the evaluation period. Using this consideration, the distribution of small loans to businesses of different sizes is good. The distribution to small loans to businesses with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue but significantly exceeded the aggregate lending in the AA.

In addition, the assessment of the performance also considered the size of loans. During the evaluation period, 76.5 percent of small loans to businesses of different sizes in the AA were less than \$100,000.

Syracuse NY MSA AA

The distribution of small loans to businesses of different sizes is good. The distribution of small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue and aggregate lending in the AA.

The assessment of the performance of small loans to businesses of different sizes was impacted by a lack of revenue information as only 43.9 percent of loans reported revenue information, which can be attributed to the bank's lending under the PPP. Management reported 498 PPP loans for \$75.9 million originated in the AA, although not all necessarily reported in CRA data. Management did not collect revenue information on PPP loans, and as a result, the bank reported a higher percentage of loans without revenue information in 2020 and 2021 (73.1 percent and 66.4 percent, respectively).

The assessment of performance also leveraged the distribution of small loans to businesses of different sizes in 2019 when all loans reported revenue information. Performance in 2019 was good.

Since management generally collects revenue information on all loans except PPP loans, the assessment of performance considered the distribution of small loans to businesses of different sizes excluding loans without reported revenue information for the evaluation period. Using this consideration, the distribution of small loans to businesses of different sizes is good. The distribution to small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue but exceeded the aggregate lending in the AA.

In addition, the assessment of the performance also considered the size of loans. During the evaluation period, 70.2 percent of small loans to businesses of different sizes in the AA were less than \$100,000.

Small Loans to Farms

Refer to Table T in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to farms in the state of New York is good.

Buffalo-Cheektowaga NY MSA AA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of those farms but exceeded aggregate lending in the AA.

The assessment of performance considered the bank's market share. According to the 2020 market share data, there were 16 lenders originating 129 loans for \$6.8 million in the AA. CBNA had the fifth most loans by number with a market share of 10.9 percent and the second greatest volume by dollar with 21.6 percent market share.

NY Non MSA AA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of those farms but significantly exceeded aggregate lending in the AA.

The assessment of performance considered the bank's market share. According to the 2020 market share data, there were 30 lenders originating 1,078 loans for \$61.1 million in the AA. CBNA had the greatest market share by number of loans with a market share of 18 percent and the second greatest volume by dollar with 24.7 percent market share. The largest lender by dollar volume had a market share of 29.5 percent and the third most loans by number.

Rochester NY MSA AA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of those farms but significantly exceeded aggregate lending in the AA.

The assessment of performance considered the bank's market share. According to the 2020 market share data, there were 18 lenders originating 342 loans for \$20.2 million in the AA. CBNA had the second most loans by number with a market share of 19.3 percent and the second greatest volume by dollar with 32.9 percent market share. The largest lender by number of loans had a market share of 26 percent but only 3.9 percent of the market share by dollar amount. The largest lender by dollar volume had a market share of 38.9 percent and the third most loans by number.

Syracuse NY MSA AA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less was well below the percentage of those farms but exceeded aggregate lending in the AA.

The assessment of performance considered the bank's market share. According to the 2020 market share data, there were 13 lenders originating 174 loans for \$6.3 million in the AA. CBNA had the fifth most loans by number with a market share of 10.3 percent and the third greatest volume by dollar with 22 percent market share.

Community Development Lending

The institution has made an adequate level of CD loans in the state of New York.

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

Buffalo-Cheektowaga NY MSA AA

CBNA originated a relatively high level of CD loans in the Buffalo-Cheektowaga NY MSA AA. During the evaluation period, the bank originated five CD loans totaling \$29 million in the AA. All the CD loans were for economic development and stabilization and revitalization of low- and moderate-income geographies. CD loans were responsive to identified economic development needs in the AA. Examples of CD loans included the following:

- Three PPP loans totaling \$4.6 million were for businesses located in low-income census tracts.
- Two loans totaling \$24.4 million for the economic development and/or revitalization and stabilization of low- and moderate-income geographies and targeting job creation for low- and moderate-income individuals.

NY Non MSA AA

CBNA originated an adequate level of CD loans in the NY Non MSA AA. During the evaluation period, the bank originated 54 CD loans totaling \$19.5 million in the AA. Seventeen loans were PPP loans totaling \$4.8 million. Two loans totaling \$225,000 funded affordable housing agencies while an additional 13 loans totaling \$1.9 million provided funding for affordable housing for low- and moderate-income individuals. Seventeen loans funded organizations providing community services to low- and moderate-income individuals totaling \$4.3 million. Four loans totaling \$7.9 million provided job creation and economic revitalization. CD lending was responsive to identified affordable housing needs, community service needs, and economic development needs in the AA. Examples of CD loans included the following:

- Seventeen PPP loans for businesses located in low- and moderate-income census tracts totaling \$4.8 million
- Two loans totaling \$5.5 million providing funding to a business in an area targeting revitalization while another \$2.4 million loan providing funding for a business expansion.
- Five loans, primarily working capital lines of credit, totaling \$2.7 million to two organizations providing services low- and moderate-income individuals with disabilities.

Rochester NY MSA AA

CBNA originated a relatively high level of CD loans in the Rochester NY MSA AA. During the evaluation period, the bank originated five loans totaling \$15.5 million in the AA. One CD loan was for an organization providing services for low- and moderate-income youth. The remainder of the loans were for economic development and stabilization and revitalization of low- and moderate-income geographies. CD lending was responsive to identified economic development needs in the AA.

Examples of CD loans included the following:

- One loan totaling \$113,000 for an agency providing community services to low- and moderate-income youth for renovations and new equipment at an existing facility.
- Two PPP loans totaling \$1.1 million for businesses located in moderate-income census tracts.
- Two loans totaling \$14.3 million to a business in a moderate-income census tract to fund job retention targeting low- and moderate-income individuals.

Syracuse NY MSA AA

CBNA originated a relatively high level of CD loans in the Syracuse NY MSA AA. During the evaluation period, the bank originated 19 loans totaling \$9.9 million in the AA. One loan totaling \$500,000 provided funding to an affordable housing agency. One loan provided funding for a town to purchase a vehicle in a Federal Emergency Management Agency (FEMA) disaster area. Nine loans totaling \$3.2 million provided funding for organizations providing community services to low- and moderate-income individuals. The remaining loans totaling \$6 million were PPP loans. CD lending was responsive to identified affordable housing needs, community service needs, and economic development needs in the AA. Examples of CD loans included the following:

- Three loans totaling \$3 million to an organization providing low- and moderate-income families with educational guidance and resources to obtain economic self-sufficiency in Madison County.
- Three loans totaling \$88,000 to a residential mental health and substance abuse facility that serves low- and moderate-income individuals in a moderate-income census tract.
- Eight PPP loans totaling \$6 million to business located in low- and moderate-income census tracts, including some nonprofit organizations with a mission for affordable housing advocacy.

New York Statewide

CBNA also originated one PPP loan for \$1.3 million outside the bank's AA, but the loan benefited the greater regional area, specifically the Buffalo-Cheektowaga NY MSA AA. Consideration was given to this loan as CBNA was responsive to the CD needs and opportunities of its AAs.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. CBNA offers several loan products and programs with features that were responsive to credit needs of low- and moderate-income individuals.

In addition to the innovative and flexible home mortgage and small business products CBNA offers in all or multiple states, the bank offers two additional programs to borrowers in New York. The first is the Federal Home Loan Bank of New York (FHLB NY)'s Homebuyer Dream Program. The program provides up to \$9,500 in down payment assistance as well as up to \$500 to defray the cost of homeownership counseling. Borrowers must meet the U.S. Department of Housing and Urban Development definition of a first-time homebuyer and contribute at least \$1,000 in equity into the purchase. In addition, borrowers must meet the income requirements of income at or below 80 percent of the county's area median income adjusted for household size. The loan must meet FHLB NY underwriting and income standards.

CBNA is also an authorized commercial bank participating in the New York State Linked Deposit Program (LDP) through the New York State Short Term Investment Pool. The LDP is used by the bank to fund eligible business loans at a reduced interest rate, which could amount to a 2 or 3 percent rate reduction on a fixed rate loan.

Buffalo-Cheektowaga NY MSA AA

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, CBNA originated 105 NCC mortgages to low- and moderate-

income borrowers for \$9.4 million, two loans through the USDA Guarantees Rural Housing Program \$207,365, one loan through the Homebuyer Dream Program for \$171,000, and one Affordable Homeownership Grant Program loan for \$76,000 in the AA. In addition, the bank originated six SBA 7(a) loans for \$1.8 million, three FSA loans for \$915,514, two loans through Pursuit Lending for \$450,000, and one loan through the LDP for \$700,000 in the AA.

COVID-19 Pandemic Activities

CBNA worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic.

- CBNA provided COVID-19-related deferrals on 301 home mortgage loans. Management did not provide deferral information for other loan types.
- CBNA participated in the SBA PPP to support businesses impacted by the COVID-19 pandemic. During the evaluation period, CBNA originated 187 loans, or 3.4 percent of the bank's total PPP loans, totaling \$23.7 million in the AA.

NY Non MSA AA

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, CBNA originated 1,873 NCC mortgages to low- and moderate-income borrowers for \$125.8 million, 35 USDA Guarantees Rural Housing Program loans for \$3.8 million, 21 loans through the Homebuyer Dream Program for \$1.4 million, and 34 Affordable Homeownership Grant Program loans totaling \$2.5 million in the AA. In addition, the bank originated 18 SBA 7(a) loans for \$1.2 million, three FSA loans for \$408,750, four loans through Pursuit Lending for \$942,300, and two loans through the LDP for \$2.2 million in the AA.

COVID-19 Pandemic Activities

CBNA worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic.

- CBNA provided COVID-19-related deferrals on 1,050 home mortgage loans. Management did not provide deferral information for other loan types.
- CBNA participated in the SBA PPP to support businesses impacted by the COVID-19 pandemic. During the evaluation period, CBNA originated 2,034 loans, or 37.2 percent of the bank's total PPP loans, totaling \$208.4 million in the AA.

Rochester NY MSA AA

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, CBNA originated 406 NCC mortgages to low- and moderate-income borrowers for \$28.5 million, two USDA Guarantees Rural Housing Program loans for \$268,686, two HomeReady mortgages totaling \$111,075, seven loans through the Homebuyer Dream Program for \$745,900, and seven Affordable Homeownership Grant Program loans totaling \$723,700 in the AA. In addition, the bank originated two SBA 7(a) loans for \$367,600, two FSA loans for \$175,000, and six loans through Pursuit Lending for \$5.1 million in the AA.

COVID-19 Pandemic Activities

CBNA worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic.

- CBNA provided COVID-19-related deferrals on 230 home mortgage loans. Management did not provide deferral information for other loan types.
- CBNA participated in the SBA PPP to support businesses impacted by the COVID-19 pandemic. During the evaluation period, CBNA originated 413 loans, or 7.6 percent of the bank's total PPP loans, totaling \$32.1 million in the AA.

Syracuse NY MSA AA

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, CBNA originated 284 NCC mortgages to low- and moderate-income borrowers for \$20.3 million, five USDA Guarantees Rural Housing Program loans for \$535,675, four HomeReady mortgages totaling \$408,040, one loan through the Homebuyer Dream Program for \$68,000, and seven Affordable Homeownership Grant Program loans totaling \$834,143 in the AA. In addition, the bank originated five SBA 7(a) loans for \$1.1 million in the AA.

COVID-19 Pandemic Activities

CBNA worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic.

- CBNA provided COVID-19-related deferrals on 294 home mortgage loans. Management did not provide deferral information for other loan types.
- CBNA participated in the SBA PPP to support businesses impacted by the COVID-19 pandemic. During the evaluation period, CBNA originated 498 loans, or 9.1 percent of the bank's total PPP loans, totaling \$75.9 million in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Albany-Schenectady-Troy NY MSA AA, Binghamton NY MSA AA, Elmira NY MSA AA, Glens Falls NY MSA AA, Ithaca NY MSA AA, Kingston NY MSA AA, Utica-Rome NY MSA AA, and Watertown-Fort Drum NY MSA AA is similar to the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of New York section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the NY Non MSA AA is adequate. The bank has a good level of qualified CD investments and grants in the NY Non MSA AA, but not in a

leadership position, nor those that are not routinely provided by private investors. The bank's performance in the Buffalo-Cheektowaga NY MSA AA, Rochester NY MSA AA, and Syracuse NY MSA AA is good. The bank has an excellent level of qualified CD investment and grants in the Buffalo-Cheektowaga NY MSA AA, Rochester NY MSA AA, and Syracuse NY MSA AA, but not in a leadership position, nor those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<i>Full-Scope AAs</i>										
Buffalo-Cheektowaga NY MSA AA	47	7,832	50	8,980	97	6.2	16,812	8.0	0	0
NY Non MSA AA	108	12,734	408	28,211	516	33.0	40,945	19.4	0	0
Rochester NY MSA AA	68	13,029	93	14,241	161	10.3	27,270	12.9	0	0
Syracuse NY MSA AA	108	33,347	136	13,990	244	15.6	47,347	22.4	0	0
<i>Limited-Scope AAs</i>										
Albany-Schenectady-Troy NY MSA AA	14	2,237	76	22,583	90	5.8	24,820	11.8	0	0
Binghamton NY MSA AA	35	5,553	30	4,130	65	4.2	9,683	4.6	0	0
Elmira NY MSA AA	11	1,083	35	1,658	46	2.9	2,741	1.3	0	0
Glens Falls NY MSA AA	7	821	13	1,865	20	1.3	2,686	1.3	0	0
Ithaca NY MSA AA	5	778	10	1,460	15	1.0	2,238	1.1	0	0
Kingston NY MSA AA	0	0	1	189	1	0.1	189	0.1	0	0
Utica-Rome NY MSA AA	35	6,004	68	5,607	103	6.6	11,611	5.5	0	0
Watertown-Fort Drum NY MSA AA	15	2,078	81	1,916	96	6.1	3,994	1.9	0	0
Statewide	105	20,889	5	5	110	7.0	20,894	9.9	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 bank's financial reporting system.

Buffalo-Cheektowaga NY MSA AA

During the evaluation period, the bank purchased 40 MBSs totaling \$9 million where the underlying borrowers were low- or moderate-income individuals in the AA. In addition, the bank had 47 prior period investments in the AA with a total remaining balance of \$7.8 million at the end of the evaluation period. The bank also made 10 grants totaling \$2,890 to community organizations focused on providing services in the AA to low- and moderate-income individuals during the evaluation period.

NY Non MSA AA

During the evaluation period, the bank purchased 79 MBSs totaling \$27.7 million where the underlying borrowers were low-or moderate-income individuals in the AA. In addition, the bank had 108 prior

period investments in the AA with a total remaining balance of \$12.7 million at the end of the evaluation period. The bank also made 329 grants totaling \$525,826 to community organizations focused on providing services in the AA to low-and moderate-income individuals during the evaluation period.

Rochester NY MSA AA

During the evaluation period, the bank purchased 58 MBSs totaling \$14.2 million where the underlying borrowers were low-or moderate-income individuals in the AA. In addition, the bank had 68 prior period investments in the AA with a total remaining balance of \$13 million at the end of the evaluation period. The bank also made 35 grants totaling \$8,300 to community organizations focused on providing services in the AA to low-and moderate-income individuals during the evaluation period.

Syracuse NY MSA AA

During the evaluation period, the bank purchased 60 MBSs totaling \$13.8 million where the underlying borrowers were low-or moderate-income individuals in the AA. In addition, the bank had 108 prior period investments in the AA with a total remaining balance of \$33.3 million at the end of the evaluation period. The bank also made 76 grants totaling \$165,587 to community organizations focused on providing services in the AA to low-and moderate-income individuals during the evaluation period.

New York Statewide

During prior evaluation periods, CBNA purchased 105 qualifying MBSs with an outstanding balance of \$20.9 million as of December 31, 2021, in the state of New York. The bank did not provide information allocating these investments to specific AAs. Consideration was given to five grants totaling \$4,625 located in the state that did not have a purpose, mandate, or function to serve the bank's AAs because CBNA was responsive to the needs and opportunities of its AAs. The grants went to community organizations providing services to low- and moderate-income individuals.

Conclusions for Areas Receiving a Limited-Scope Review

Based on limited-scope reviews, the bank's performance under the Investment Test in the Albany-Schenectady-Troy NY MSA AA, Binghamton NY MSA AA, Elmira NY MSA AA, Glens Falls NY MSA AA, Ithaca NY MSA AA, Utica-Rome NY MSA AA, and Watertown-Fort Drum NY MSA AA are consistent with the bank's overall performance under the Investment Test in the full-scope areas. Based on a limited-scope review, the bank's performance under the Investment Test in the Kingston NY MSA AA is weaker than the bank's overall performance under the Investment Test in the full-scope areas. The weaker performance in the Kingston NY MSA AA did not materially impact the bank's overall performance in the state of New York under the Investment Test.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the NY Non MSA AA and Rochester NY MSA AA is adequate. Performance in the Syracuse NY MSA AA is good. Performance in the Buffalo-Cheektowaga NY MSA AA is poor.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full-Scope AAs</i>											
Buffalo-Cheektowaga NY MSA AA	2.3	5	3.1	0.0	0.0	100.0	0.0	13.6	13.3	37.7	33.7
NY Non MSA AA	60.9	95	59.0	2.1	6.3	77.9	13.7	1.7	9.6	74.8	12.7
Rochester NY MSA AA	9.6	18	11.2	0.0	33.3	61.1	5.6	9.4	13.8	46.6	29.3
Syracuse NY MSA AA	11.5	14	8.7	0.0	35.7	35.7	28.6	9.3	16.7	45.4	27.2
<i>Limited-Scope AAs</i>											
Albany-Schenectady-Troy NY MSA AA	1.9	5	3.1	20.0	0.0	60.0	20.0	9.0	20.6	44.9	24.3
Binghamton NY MSA AA	0.9	3	1.9	0.0	0.0	100.0	0.0	8.4	16.6	43.5	31.5
Elmira NY MSA AA	0.9	2	1.2	50.0	0.0	0.0	50.0	13.5	9.1	50.7	23.8
Glens Falls NY MSA AA	0.9	2	1.2	0.0	0.0	100.0	0.0	0.0	0.0	100.0	0.0
Ithaca NY MSA AA	0.1	1	0.6	0.0	0.0	0.0	100.0	0.0	15.2	54.6	24.4
Kingston NY MSA AA	0.6	1	0.6	0.0	0.0	100.0	0.0	0.0	0.0	100.0	0.0
Utica-Rome NY MSA AA*	4.1	8	5.0	0.0	0.0	50.0	37.5	14.5	10.5	43.7	29
Watertown-Fort Drum NY MSA AA	6.4	7	4.4	0.0	14.3	41.4	14.3	0.0	18.3	74.5	7.1

*CBNA operated one branch in the Utica-Rome NY MSA AA that was in a census tract without income information.

Buffalo-Cheektowaga NY MSA AA

Delivery systems are not readily accessible to portions of the AA, particularly low- and moderate-income geographies. CBNA operated five branches in the AA, with none in low- or moderate-income census tracts.

NY Non MSA AA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA. CBNA operated 95 branches in the AA including two branches in low-income census tracts and six branches in moderate-income census tracts. The number of branches in low-income census tracts exceeded the proportion of the population in low-income census tracts but the number of branches in moderate-income census tracts was below the proportion of the population in moderate-income census tracts in the AA.

Rochester NY MSA AA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA. CBNA operated 18 branches in the AA including six branches in moderate-income census tracts. The percentage of branches in moderate-income census tracts exceeded the percentage of the population in those tracts. The bank operated no branches in low-income census tracts, and the percentage of branches in low-income census tracts was significantly below the percentage of the population in those tracts.

Syracuse NY MSA AA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA. CBNA operated 14 branches in the AA including five branches in moderate-income census tracts. The percentage of the bank's branches in moderate-income census tracts significantly exceeded the percentage of the population in those tracts. The bank operated no branches in low-income census tracts, and the percentage of branches in low-income census tracts was significantly below the percentage of the population in those tracts.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
<i>Full-Scope AAs</i>						
Buffalo-Cheektowaga NY MSA AA	0	0	0	0	0	0
NY Non MSA AA	0	18	-1	-2	-13	-2
Rochester NY MSA AA	0	0	0	0	0	0
Syracuse NY MSA AA	0	0	0	0	0	0
<i>Limited-Scope AAs</i>						
Albany-Schenectady-Troy NY MSA AA	1	0	0	0	+1	0
Binghamton NY MSA AA	0	0	0	0	0	0
Elmira NY MSA AA	0	0	0	0	0	0
Glens Falls NY MSA AA	0	0	0	0	0	0
Ithaca NY MSA AA	0	0	0	0	0	0
Kingston NY MSA AA	0	0	0	0	0	0
Utica-Rome NY MSA AA	0	0	0	0	0	0
Watertown-Fort Drum NY MSA AA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not materially affected the accessibility of its delivery systems. During the evaluation period, CBNA closed 18 branches in the NY Non MSA and opened no branches in that AA. Of the branches closed, one was located in a low-income census tract and two branches were located in moderate-income census tracts. Management explained the closure of the branch located in the low-income census tract, which was in Jamestown, NY, was due to low transaction volume and market overlap as there was another branch in a low-income census tract 1.3 miles away. A similar explanation was provided for the closure of the branch in the moderate-income census tract in Norwich, NY, as there was another branch in a middle-income census tract 1.7 miles away. Management closed the other branch located in a moderate-income census tract, which was in Fort Covington, N.Y., due to low transaction volume. The nearest branch was 15 miles away. The remaining closed branches were located in middle-income or upper-income census tracts. In the Buffalo-Cheektowaga NY MSA AA, Rochester NY MSA AA, and Syracuse NY MSA AA, CBNA did not open or close any branches.

In the limited-scope AAs, CBNA opened one branch in the Albany-Schenectady-Troy NY MSA AA in an upper-income census tract located in Albany, N.Y. CBNA did not open or close any branches in the remaining limited-scope AAs.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Management sets branch hours based upon customer needs and traffic patterns in each branch and AA.

Buffalo-Cheektowaga NY MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The bank did not operate any branches in low- or moderate geographies.

NY Non MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Most branches have extended hours on various days, including Saturdays.

Rochester NY MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Most branches have extended hours on various days, and one branch in a moderate-income census tract has Saturday hours.

Syracuse NY MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Most branches have extended hours on various days, and two branches in a moderate-income census tract have Saturday hours.

Community Development Services

The institution provides an adequate of CD services.

Buffalo-Cheektowaga NY MSA AA

The institution provides a low level of CD services. During the evaluation period, two employees contributed 21 qualified hours to two CD organizations. One employee served on a loan committee for an economic development organization and the second employee provided services to an organization serving low- and moderate-income individuals. In addition, a bank employee taught financial literacy for Westminster Economic Development Initiative during the assessment period.

NY Non MSA AA

The institution provides an adequate level of CD services. During the evaluation period, 108 employees contributed 2,376 qualified hours to 141 CD organizations but not primarily in board or leadership positions. Bank personnel provided financial and banking expertise to 24 affordable housing organizations, 71 community service organizations, 31 economic development organizations, and 15 organizations focusing on revitalizing and stabilizing low- and moderate-income geographies.

Rochester NY MSA AA

The institution provides an adequate level of CD services. During the evaluation period, 24 employees contributed 463 qualified hours to 20 CD organizations but not primarily in board or leadership positions. Bank personnel provided financial and banking expertise to three affordable housing organizations, 13 community service organizations, three economic development organizations, and one organization focusing on revitalizing and stabilizing low- and moderate-income geographies.

Syracuse NY MSA AA

The institution provides a good level of CD services. During the evaluation period, 26 employees contributed 1,004 qualified hours to 44 CD organizations primarily in board and leadership positions. Bank personnel provided financial and banking expertise to nine affordable housing organizations, 22 community service organizations, five economic development organizations, and eight organizations focusing on revitalizing and stabilizing low- and moderate-income geographies. Examples of CD services in the AA include:

- Three employees served as a board member for three affordable housing organizations.
- One employee served as a board member for an organization focused on job creation and the revitalization in one county in the AA with low- and moderate-income census tracts.
- One employee serves as a board member for a land bank focusing on revitalizing low- and moderate-income census tracts.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Elmira NY MSA AA and Watertown-Fort Drum NY MSA AA is stronger than the bank's overall performance under the Service Test in the full-scope areas. The stronger performance in the Elmira NY MSA AA and Watertown-Fort Drum NY MSA AA did not materially impact the bank's overall performance under the

Service Test in the state of New York. Based on a limited-scope review, the bank's performance under the Service Test in the Albany-Schenectady-Troy NY MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope areas. Based on limited-scope reviews, the bank's performance under the Service Test in the Binghamton NY MSA AA, Glens Falls NY MSA AA, Ithaca NY MSA AA, Kingston NY MSA AA, and Utica-Rome NY MSA AA is weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance in the Binghamton NY MSA AA, Glens Falls NY MSA AA, Ithaca NY MSA AA, Kingston NY MSA AA, and Utica-Rome NY MSA AA negatively impacted the bank's overall performance under the Service Test in the state of New York.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the credit needs in the AA.
- The geographic distribution of loans in the AA is good.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses of different sizes is excellent.
- The level of community development loans positively contributed to the bank's performance.
- The use of innovative and flexible loan products contributed positively to the bank's performance.
- The bank has an excellent level of qualified investments but through passive investments and small grants.
- The bank's delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- Services and business hours do not vary in a way that inconveniences low- and moderate-income individuals or geographies.

Description of Institution's Operations in Pennsylvania

CBNA had three AAs in the state of Pennsylvania consisting of the Allentown-Bethlehem-Easton, PA MSA AA (Allentown-Bethlehem-Easton PA MSA AA) (MSA #10900); Scranton-Wilkes-Barre, PA MSA AA (Scranton-Wilkes-Barre PA MSA AA) (MSA #42540), and non-metropolitan counties in Pennsylvania (PA Non MSA AA). The three contiguous AAs are in northeastern and central Pennsylvania. The Allentown-Bethlehem-Easton PA MSA AA consisted of a portion of only one county in the MSA, Carbon County, where the bank had its physical presence. The Scranton-Wilkes-Barre PA MSA consisted of all three counties in the MSA. The PA Non MSA AA consisted of Susquehanna County and portions of Bradford and Schuylkill Counties. CBNA does not have any branches in Schuylkill County; however, the branch in Carbon County is located on the line between the two counties and CBNA included whole townships in the adjacent census tracts. CBNA operated 24 branches with ATMs as well as two standalone drive-up windows, one of which had an ATM, in the state during the evaluation period. The 26 branches and drive-ups represented 11.9 percent of the bank's branch network.

CBNA's strategy during the evaluation period emphasized organic loan and deposit growth. CBNA's business activities include commercial banking, retail banking, and wealth management services. Home loans accounted for 60 percent of loans originated in Pennsylvania. Small business and small farm loans accounted for 39.8 percent and 0.2 percent of loans, respectively. The bank faced strong competition for deposits and loans in the state.

During the evaluation period, CBNA originated or purchased 12.2 percent of its total home mortgages, 15.4 percent of its total small business loans, and 0.8 percent of its total small farm loans in the state of Pennsylvania.

Scranton–Wilkes-Barre PA MSA AA

CBNA operated 19 branches and two standalone drive-ups in the Scranton–Wilkes-Barre PA MSA AA during the evaluation period. The bank also operated 20 ATMs, 16 of which were deposit-taking ATMs, and none of which were standalone. One branch was in a low-income census tract in Luzerne County. Five branches and a drive-up were in moderate-income census tracts, with three branches and a drive-up in Lackawanna County and two branches and the drive-up window in Luzerne County. The 21 branches and drive-ups accounted for 9.6 percent of the bank-wide branch network and 80.8 percent of branches in the state of Pennsylvania.

The bank faced strong competition for deposits in the Scranton–Wilkes-Barre PA MSA AA. CBNA reported \$1.3 billion in deposits in the AA, which represented 10 percent of total deposits. According to the FDIC Deposit Market Share Report as of June 30, 2021, CBNA ranked seventh out of 22 depository institutions with a deposit market share of 7.6 percent. The bank's top competitors for deposit market share in the AA include PNC Bank, N.A. with 27.8 percent, M&T Bank with 8.4 percent, Wells Fargo Bank, N.A. with 8 percent, and The Fidelity Deposit and Discount Bank with 7.7 percent.

CBNA originated and purchased 10.2 percent of its total home mortgage loans in the Scranton–Wilkes-Barre PA MSA AA and 83.7 percent of home mortgage loans in the state of Pennsylvania in the AA during the evaluation period. CBNA originated and purchased 13.4 percent of its total small business loans in the Scranton–Wilkes-Barre PA MSA AA and 87 percent of small business loans in the state of Pennsylvania in the AA during the evaluation period.

Economic Data

According to the May 2022 Moody's Analytics report, the Scranton–Wilkes-Barre, PA MSA was in the recovery phase of the business cycle. The area benefited from its proximity to several large east coast markets, below average living costs, and access to interstate highways, making the MSA a distribution and logistics hub. However, the distribution and logistics sectors, among others dominating the economy in the MSA, have a concentration of low-paying jobs. Like other metropolitan areas in the former Rust Belt, the MSA suffers from a declining population and low levels of higher educational attainment.

According to the U.S. BLS December 2021 data, the unemployment rate (not seasonally adjusted) in the Scranton–Wilkes-Barre, Pa. MSA was 5.3 percent, which outperformed the state unemployment rate of 5.5 percent. During the evaluation period, unemployment ranged from a low of 4.7 percent in April 2019 to a high of 17.4 percent in April 2020 during the COVID-19 pandemic. Generally, the unemployment rate did not differ materially from the state's unemployment rate. Per Moody's Analytics, key sectors of the economy include education and health services, retail trade, manufacturing, and government. Top

employers in the MSA include Geisinger Health System, Community Health Systems, Proctor & Gamble, and Mohegan Sun at Pocono Downs.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts conducted during the evaluation period within the Scranton–Wilkes-Barre PA MSA AA to determine local economic conditions and community needs. The community contacts noted the need for more funding for small business loans, particularly for entrepreneurs, and programs to assist with affordable homeownership and senior housing.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Scranton–Wilkes-Barre PA MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	3.5	24.7	51.2	19.4	1.2
Population by Geography	561,701	3.2	20.5	52.2	23.6	0.5
Housing Units by Geography	258,782	3.1	20.3	54.5	21.8	0.4
Owner-Occupied Units by Geography	152,184	1.6	14.2	56.5	27.5	0.0
Occupied Rental Units by Geography	72,436	6.0	31.3	48.8	12.9	1.0
Vacant Units by Geography	34,162	3.0	24.1	57.4	14.9	0.6
Businesses by Geography	51,264	2.8	19.4	51.2	24.6	2.1
Farms by Geography	1,182	1.8	10.4	54.1	33.5	0.3
Family Distribution by Income Level	141,530	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	224,620	25.1	15.9	16.9	42.2	0.0
Median Family Income MSA - 42540 Scranton–Wilkes-Barre, Pa. MSA		\$59,887	Median Housing Value			\$130,472
2021 MFI MSA – 42540 Scranton–Wilkes-Barre, Pa. MSA		\$70,600	Median Gross Rent			\$710
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2021 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 Pennsylvania

The OCC conducted a full-scope review of the Scranton–Wilkes-Barre PA MSA AA and limited-scope reviews of the Allentown-Bethlehem-Easton PA MSA AA and PA Non MSA AA. The full-scope AA accounted for 90.7 percent of deposits, 85 percent of loans, and 80.8 percent of branches in the state of Pennsylvania. Home mortgage loans, which accounted for 60 percent of loans originated or purchased in the state's AAs during the evaluation period, were given more weight than small business loans. CBNA did not originate enough small farm loans during the evaluation period in any of the state's AAs to provide a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Scranton–Wilkes-Barre PA MSA AA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<i>Full-Scope AA</i>							
Scranton–Wilkes-Barre PA MSA AA	1,780	1,226	4	115	3,125	85.4	90.7
<i>Limited-Scope AAs</i>							
Allentown-Bethlehem-Easton PA MSA AA	80	21	0	1	102	2.8	0.8
PA Non MSA AA	266	162	3	3	434	11.9	8.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume (000s) of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<i>Full-Scope AA</i>							
Scranton–Wilkes-Barre PA MSA AA	198,439	161,311	50	26,940	386,740	84.7	90.7
<i>Limited-Scope AAs</i>							
Allentown-Bethlehem-Easton PA MSA AA	6,706	1,227	0	435	8,368	1.8	0.8
PA Non MSA AA	29,442	27,933	22	4,153	61,550	13.5	8.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels demonstrate good responsiveness in the Scranton–Wilkes-Barre PA MSA AA.

Per the FDIC Deposit Market Share Report as of June 30, 2021, the bank ranked seventh out of 22 depository institutions, or 68th percentile, with 7.6 percent of the market share. CBNA reported \$1.3 billion in deposits in the AA.

Based on the 2021 HMDA market share data, CBNA ranked fifth out of 431 lending institutions, or in the 99th percentile, with a 3.9 percent market share, demonstrating good responsiveness to credit needs. CBNA and the other top four lenders, Rocket Mortgage, Fidelity Deposit & Discount Bank, Wells Fargo, N.A., and PennyMac Loan Services, LLC, had a combined market share of 24.4 percent. Market share for the top five lenders ranged from CBNA's 3.9 percent to 8.1 percent.

Based on the 2020 CRA small business loan data, the bank ranked seventh out of 126 lending institutions, or in the 94th percentile, with a 4.8 percent market share, demonstrating good responsiveness to credit needs. The top five lenders in the market, American Express National Bank, Fidelity Deposit & Discount Bank, Peoples Security Bank & Trust, PNC Bank, N.A., and Wells Fargo Bank, N.A. had a combined market share of 43.4 percent. Market share of the top five lenders ranged from 5.2 percent to 11.9 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in low- and moderate-income census tracts significantly exceeded the percentage of owner-occupied housing and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania 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 is adequate. The geographic distribution of small loans to businesses in low-income census tracts was significantly below the percentage of businesses located in low-income census tracts and well below the aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income tracts was below the percentage of businesses located in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance in low- and moderate-income census tracts considered the limited number of businesses in low-income census tracts. Businesses in low-income census tracts represented only 2.8 percent of all non-farm businesses in the AA while businesses in moderate-income census tracts represented 19.4 percent of all non-farm businesses.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CBNA's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Pennsylvania 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 to individuals of different income levels is excellent. Home mortgage lending to low-income borrowers was somewhat below the number of low-income families but exceeded aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers exceeded the number of moderate-income families and aggregate lending to moderate-income families in the AA.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes is good. The distribution of small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue but below the aggregate lending in the AA.

The assessment of the performance of small loans to businesses of different sizes was impacted by a lack of revenue information as only 51.1 percent of loans reported revenue information, which can be attributed to the bank's lending under the PPP. Management reported 651 PPP loans for \$93.8 million originated in the AA, although not all necessarily reported in CRA data. Management did not collect revenue information on PPP loans, and as a result, the bank reported a higher percentage of loans without revenue information in 2020 and 2021 (68.1 percent and 58.1 percent, respectively).

The assessment of performance also leveraged the distribution of small loans to businesses of different sizes in 2019 when 99 percent of loans reported revenue information. Performance in 2019 was good.

Since management generally collects revenue information on all loans except PPP loans, the assessment of performance considered the distribution of small loans to businesses of different sizes excluding loans without reported revenue information for the evaluation period. Using this consideration, the distribution of small loans to businesses of different sizes is good. The distribution to small loans to businesses with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue but exceeded the aggregate lending in the AA.

In addition, the assessment of the performance also considered the size of loans. During the evaluation period, 67.1 percent of small loans to businesses of different sizes in the AA were less than \$100,000.

Community Development Lending

The bank has made a relatively high level of CD loans. The level of CD lending positively impacted the Lending Test Conclusion.

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

During the evaluation period, CBNA originated 115 loans totaling \$26.9 million in the Scranton–Wilkes-Barre PA MSA AA. The bank originated 95 loans totaling \$5.9 million to one organization providing community services to low- and moderate-income individuals with disabilities. An additional 18 loans for \$19.2 million were PPP loans to businesses located in low- and moderate-income census tracts. The bank also originated one \$15,000 loan for working capital to a nonprofit organization providing language assistance and services in a low-income census tract. The bank originated one loan for \$1.8 million for revitalization and stabilization efforts in a moderate-income census tract in Lackawanna County.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, CBNA originated 395 NCC mortgages to low- and moderate-income borrowers for \$28.1 million and two Affordable Homeownership Grant Program loans for \$286,600 in the AA. In addition, the bank originated eight SBA 7(a) loans for \$2 million and one loan through Pursuit Lending for \$600,000 in the AA.

COVID-19 Pandemic Activities

CBNA worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic.

- CBNA provided COVID-19-related deferrals on 238 home mortgage loans. Management did not provide deferral information for other loan types.
- CBNA participated in the SBA PPP to support businesses impacted by the COVID-19 pandemic. During the evaluation period, CBNA originated 651 loans, or 11.9 percent of the bank's total PPP loans, totaling \$93.8 million in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Allentown-Bethlehem-Easton MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Based on a limited-scope review, the bank's performance under the Lending Test in the PA Non MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance in the PA Non MSA AA did not materially impact the bank's overall performance under the Lending Test in the state of Pennsylvania.

Refer to Tables O through R in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Scranton–Wilkes-Barre PA MSA AA is good.

The bank has an excellent level of qualified CD investment and grants, but not in a leadership position, particularly nor those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<i>Full-Scope AA</i>										
Scranton-Wilkes Barre PA MSA AA	67	12,279	309	22,054	376	74.6	34,333	73.0	0	0
<i>Limited-Scope AAs</i>										
Allentown-Bethlehem-Easton PA MSA AA	3	583	29	2,920	32	6.3	3,503	7.4	0	0
PA Non MSA AA	4	415	31	3,322	35	6.9	3,737	7.9	0	0
Statewide	61	5,463	0	0	61	12.1	5,463	11.6	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 bank's financial reporting system.

Scranton–Wilkes-Barre PA MSA AA

During the evaluation period, the bank purchased 83 MBSs totaling \$21.6 million where the underlying borrowers were low- or moderate-income individuals in the AA. As of December 31, 2021, the outstanding balance of 67 prior period investments in the AA totaled \$12.3 million. The bank made 226 grants totaling \$446,895 to community organizations focused on providing services in the AA to low- and moderate-income individuals.

Pennsylvania Statewide

During prior evaluation periods, CBNA purchased 61 qualifying MBSs with an outstanding balance of \$5.5 million as of December 31, 2021, in the state of Pennsylvania. The bank did not provide information allocating these investments to specific AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Allentown-Bethlehem-Easton PA MSA AA and PA Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Scranton-Wilkes-Barre PA MSA AA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full-Scope AA</i>											
Scranton-Wilkes-Barre PA MSA AA*	90.7	21	80.8	4.8	28.6	47.6	14.3	3.2	20.5	52.2	23.6
<i>Limited-Scope AAs</i>											
Allentown-Bethlehem-Easton PA MSA AA	0.8	2	7.7	50	50	0	0	10	29.8	60.2	0
PA Non MSA AA	8.5	3	11.5	0	0	100	0	0	14.8	76.4	8.8

*CBNA operated one branch in the Scranton-Wilkes-Barre PA MSA AA that was in a census tract without income information.

CBNA operated 19 branches in the AA, including one branch in a low-income census tract and four branches in a moderate-income census tract. In addition, the bank has two drive-up locations in moderate-income census tracts. Branches in low- and moderate-income tracts exceeded the percentage of the population distribution of low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
<i>Full-Scope AA</i>						
Scranton–Wilkes-Barre PA MSA AA	0	4	0	0	-4	0
<i>Limited-Scope AAs</i>						
Allentown-Bethlehem-Easton PA MSA AA	0	0	0	0	0	0
PA Non MSA AA	0	2	0	0	-2	0

To the extent changes have been made, the bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The branch closed a total of six branches, all located in middle-income census tracts, four of which were in the Scranton–Wilkes-Barre PA MSA AA. The closures did not generally affect the accessibility of delivery systems of low- and moderate-income geographies and individuals in the area. The bank did not open any branches during the evaluation period in the state of Pennsylvania.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations. Most branches have extended hours on various days, and all but two branches in a low- or moderate-income census tracts has Saturday hours.

Community Development Services

The institution provides an adequate level of CD services. During the evaluation period, 21 employees contributed 609 hours to 28 CD organizations but not primarily in a leadership role. Two employees accounted for more than 50 percent of the hours in the AA. Bank personnel provided financial and banking expertise to two affordable housing organizations, 19 community service organizations, six economic development organizations, and one organization focusing on revitalizing and stabilizing low- and moderate-income geographies.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Allentown-Bethlehem-Easton PA MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope area. Based on a limited-scope review, the bank's performance under the Service Test in the PA Non MSA AA is weaker than the bank's overall performance under the Service Test in the full-scope area. The weaker performance in the PA Non MSA AA did not materially impact the bank's overall performance under the Service Test in the state of Pennsylvania.

State Rating

State of Vermont

CRA rating for the State of Vermont: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to the credit needs in the AA.
- The geographic distribution of loans in the AA is excellent.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses of different sizes is adequate.
- The level of community development loans contributed positively to the bank's performance.
- The use of innovative and flexible loan products contributed positively to the bank's performance.
- The bank has an excellent level of qualified investments but through passive investments and small grants.
- The bank's delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- Services and business hours do not vary in a way that inconveniences low- and moderate-income individuals or geographies.

Description of Institution's Operations in Vermont

CBNA has two AAs in the state of Vermont consisting of the Burlington-South Burlington, VT MSA AA (Burlington VT MSA AA) (MSA #15540) and the VT Non MSA. The Burlington-South Burlington VT MSA AA consists of Chittenden, Franklin, and Grand Isle counties. The VT Non MSA AA consists of Bennington, Caledonia, Lamoille, Washington, and Windham counties as well as whole townships but part of the counties in Addison, Orange, Rutland, and Windsor. CBNA operated 30 branches equipped with ATMs and two standalone, deposit-taking ATMs in Vermont during the evaluation period. The 30 branches represented 13.8 percent of the bank's branch network.

CBNA's strategy during the evaluation period emphasized organic loan and deposit growth. CBNA's business activities include commercial banking, retail banking, and wealth management services. Small business loans accounted for 56.2 percent of CBNA loans (based on home mortgage loans, small business loans, and small farm loans) originated in the state. Home mortgage loans accounted for 42.6 percent of CBNA loans and small farm loans accounted for 1.2 percent of CBNA loans in the state.

CBNA originated and purchased 5.3 percent of its total home mortgages and 13.2 percent of its total small business loans in the state of Vermont AAs during the evaluation.

Burlington-South Burlington VT MSA AA

CBNA operated 12 branches equipped with deposit-taking ATMs in the Burlington-South Burlington VT MSA AA. One branch was located in a low-income census tract and three branches were located in moderate-income census tracts. The branch in a low-income census tract was located in Chittenden County, and one branch in a moderate-income census tract was located in Franklin County while the other two were located in Chittenden County. The 12 branches accounted for 5.5 percent of the bank's total branch network and 40 percent of the branches in the state of Vermont.

The bank faced strong competition for deposits and loans in the AA. CBNA reported \$807.1 million in deposits in the AA. According to June 30, 2021, FDIC Deposit Market Share report, CBNA ranked third out of 14 depository institutions with a deposit market share of 11.4 percent. The bank's top competitors for deposit market share in the AA include TD Bank, N.A. with 28.4 percent, People's United Bank, N.A. with 28.3 percent, KeyBank, N.A. with 10.2 percent, and Citizens Bank, N.A. with 6.6 percent.

CBNA originated and purchased 2 percent of its total home mortgage loans in the Burlington-South Burlington VT MSA AA and 37 percent of home mortgage loans in the state of Vermont in the AA during the evaluation period. CBNA originated and purchased 8.1 percent of its total small business loans in the Burlington-South Burlington VT MSA AA and 61.6 percent of small business loans in the state of Vermont in the AA during the evaluation period.

Economic Data

According to the May 2022 Moody's Analytics report, the Burlington-South Burlington VT MSA was in the recovery phase of the business cycle. The MSA is the economic hub of the state of Vermont. It benefited from a highly educated workforce, high-tech jobs, and entrepreneurial activity. In addition, the MSA was a magnet for tourism for both skiing and other outdoor activities due to the proximity to mountain ranges and outdoor scenery. However, the MSA is located far from other large metropolitan area and the small population can restrict growth.

According to December 2021 data from the BLS, the unemployment rate (not seasonally adjusted) in the Burlington-South Burlington VT MSA was 2 percent, which outperformed the Vermont unemployment rate of 3.1 percent. During the evaluation period, unemployment ranged from a low of 1.5 percent in May 2019 to a high of 11.9 percent in April 2020 during the COVID-19 pandemic. The unemployment rate in the MSA was lower than the state's unemployment rate during the entire evaluation period. Per Moody's Analytics, the key sectors of the economy include education and health services, government, and professional and business services. Top employers in the MSA include the University of Vermont Medical Center, the University of Vermont, and GlobalFoundries. The large GlobalFoundries semiconductor plant in Essex Junction is the largest private employer in Vermont.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts conducted during the evaluation period within the Burlington-South Burlington VT MSA AA to determine local

economic conditions and community needs. One community contact noted the need for more affordable housing and the credit needs for small businesses, particularly start-ups and microbusinesses with fewer than five employees. Another community contact noted the state of Vermont is very rural, and there is a need for affordable housing and economic development in cities like Burlington but also other parts of the state that attract less capital for investment.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Burlington-South Burlington VT MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	2.1	23.4	57.4	14.9	2.1
Population by Geography	215,081	1.4	19.4	60.3	18.9	0.0
Housing Units by Geography	94,009	1.4	22.0	60.6	15.9	0.0
Owner-Occupied Units by Geography	57,434	1.0	13.2	65.6	20.2	0.0
Occupied Rental Units by Geography	27,714	2.5	37.1	51.3	9.1	0.0
Vacant Units by Geography	8,861	0.8	32.1	57.6	9.5	0.0
Businesses by Geography	28,411	0.9	23.5	53.9	21.6	0.2
Farms by Geography	1,241	0.5	13.5	66.9	19.1	0.0
Family Distribution by Income Level	52,010	20.5	17.9	23.1	38.5	0.0
Household Distribution by Income Level	85,148	23.7	16.1	18.8	41.4	0.0
Median Family Income MSA - 15540 Burlington-South Burlington, Vt. MSA		\$82,811	Median Housing Value			\$263,536
2021 MFI MSA - 15540 Burlington-South Burlington, Vt. MSA		\$95,900	Median Gross Rent			\$1,069
			Families Below Poverty Level			6.2%
<i>Source: 2015 ACS and 2021 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 Vermont

The OCC conducted a full-scope review of the Burlington-South Burlington VT MSA AA and a limited-scope review of the VT Non MSA AA. The full-scope AA accounted for 51.8 percent of deposits, 50.8 percent of loans, and 40 percent of branches in the state of Vermont. Small business loans, which accounted for 56.2 percent of loans originated or purchased in the state's AAs during the evaluation period, were given more weight than home mortgage loans. CBNA did not originate enough small farm loans during the evaluation period in either AA to provide a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

The bank's performance under the Lending Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington-South Burlington VT MSA AA is good.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<i>Full-Scope AA</i>							
Burlington-South Burlington VT MSA AA	340	745	10	18	1,113	51.1	51.8
<i>Limited-Scope AA</i>							
VT Non MSA AA	578	465	16	4	1,063	48.9	48.2

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume (000s) of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<i>Full-Scope AA</i>							
Burlington-South Burlington VT MSA AA	128,229	121,216	784	26,370	276,599	68.3	51.8
<i>Limited-Scope AA</i>							
VT Non MSA AA	67,506	59,179	429	1,486	128,600	31.7	48.2

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels reflect adequate responsiveness to Burlington-South Burlington VT MSA AA credit needs.

Per the FDIC Deposit Market Share Report as of June 30, 2021, the bank ranked third out of 14 depository institutions, with a 11.4 percent deposit market share. CBNA reported \$807.1 million in deposits in the AA.

Based on the 2021 HMDA market share data, CBNA ranked 19th out of 192 lending institutions, or the 90nd percentile, with a 1.3 percent market share, demonstrating adequate responsiveness to credit needs. The top five home mortgage lenders in the market, New England FCU, Vermont FCU, Rocket Mortgage, Northeast Home Loan, LLC, and Union Bank, had a combined market share of 50.5 percent. Market share for the top five lenders ranged from 3.9 percent to 29.8 percent.

Based on the 2020 CRA small business loan data, the bank ranked fifth out of 99 lending institutions, or the 95th percentile, with a 6.2 percent market share, demonstrating adequate responsiveness to credit needs. CBNA and the other top four lenders in the market, People United Bank, N.A., American Express

National Bank, TD Bank, N.A., and Northfield Savings Bank, had a combined market share of 49.7 percent. Market share of the top five lenders ranged from CBNA's 6.2 percent to 15.1 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in low- and moderate-income census tracts exceeded the percentage of owner-occupied housing and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Vermont 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 is excellent. The geographic distribution of small loans to businesses in low-income census tracts was near to the percentage of businesses located in low-income census tracts and was equal to the aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income tracts exceeded the percentage of businesses located in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance in low- and moderate-income census tracts considered the limited number of businesses in low-income census tracts. Businesses in low-income census tracts represented only 0.9 percent of all non-farm businesses in the AA while businesses in moderate-income census tracts represented 23.5 percent of all non-farm businesses in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CBNA's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Vermont 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 to individuals of different income levels is good. Home mortgage lending to low-income borrowers was below the number of low-income families and significantly exceeded the aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers was near to the number of moderate-income families and below aggregate lending to moderate-income families in the AA.

Small Loans to Businesses

Refer to Table R in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes is adequate. The distribution to small loans to businesses with less than \$1 million in revenue was significantly below the number of businesses with less than \$1 million in revenue and well below the aggregate lending in the AA.

The assessment of the performance of small loans to businesses of different sizes was impacted by a lack of revenue information as only 43.2 percent of loans reported revenue information, which can be attributed to the bank's lending under the PPP. Management reported 462 PPP loans for \$78 million originated in the AA, although not all necessarily reported in CRA data. Management did not collect revenue information on PPP loans, and as a result, the bank reported a higher percentage of loans without revenue information in 2020 and 2021 (72.7 percent and 64 percent, respectively).

The assessment of performance also leveraged the distribution of small loans to businesses of different sizes in 2019 when all loans reported revenue information. Performance in 2019 was adequate.

Since management generally collects revenue information on all loans except PPP loans, the assessment of performance considered the distribution of small loans to businesses of different sizes excluding loans without reported revenue information for the evaluation period. Using this consideration, the distribution of small loans to businesses of different sizes is good. The distribution to small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue but exceeded the aggregate lending in the AA.

In addition, the assessment of the performance also considered the size of loans. During the evaluation period, 58 percent of small loans to businesses of different sizes in the AA were less than \$100,000.

Community Development Lending

The institution has made a relatively high level of CD loans.

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

During the evaluation period, CBNA originated 18 CD loans totaling \$26.4 million in the Burlington-South Burlington VT MSA AA. The bank originated nine PPP loans for \$10.1 million and an additional two loans totaling \$460,000 in a declared disaster area. The remaining seven loans totaling \$15.8 million were for revitalization and stabilization in low- and moderate-income census tracts in the AA.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, CBNA originated 41 NCC mortgages to low- and moderate-income borrowers for \$4.1 million and one USDA Guarantees Rural Housing Program loan for \$201,919 in the AA. In addition, the bank originated two SBA 7(a) loans for \$347,000 in the AA.

COVID-19 Pandemic Activities

CBNA worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic.

- CBNA provided COVID-19-related deferrals on 37 home mortgage loans. Management did not provide deferral information for other loan types.
- CBNA participated in the SBA PPP to support businesses impacted by the COVID-19 pandemic. During the evaluation period, CBNA originated 462 loans, or 8.5 percent of the bank's total PPP loans, totaling \$78 million in the AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the VT Non MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through R in the state of Vermont section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington-South Burlington VT MSA AA is good.

The bank has an excellent level of qualified CD investment and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<i>Full-Scope AA</i>										
Burlington-South Burlington VT AA	6	1,334	188	97,668	194	50.5	\$99,002	69.1	0	0
<i>Limited-Scope AAs</i>										
VT Non MSA AA	12	1,613	153	36,358	165	43.0	\$37,971	26.5	0	0
Statewide	25	6,235	0	0	25	6.5	6,235	4.4	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.

Burlington-South Burlington VT MSA AA

During the evaluation period, the bank purchased 123 MBSs totaling \$97.4 million where the underlying borrowers were low-or moderate-income individuals in the AA. As of December 31, 2021, the outstanding balance of six prior period investments in the AA totaled \$1.3 million. The bank also made 65 grants totaling \$244,921 during the evaluation period to community organizations focused on providing services in the AA to low-and moderate-income individuals.

Vermont Statewide

During prior evaluation periods, CBNA purchased 25 qualifying MBSs with an outstanding balance of \$6.2 million as of December 31, 2021, in the state of Vermont. The bank did not provide information allocating these investments to specific AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the VT Non MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area in the state of Vermont.

SERVICE TEST

The bank's performance under the Service Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington-South Burlington VT MSA AA good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full-Scope AA</i>											
Burlington-South Burlington VT MSA AA	51.8	12	40	8.3	25	50	16.7	1.4	19.4	60.3	18.9
<i>Limited-Scope AA</i>											
VT Non MSA AA	48.2	18	60	0.0	11.1	77.8	11.1	0.0	9.4	75.5	15.1

CBNA operated 12 branches in the AA, including one branch in a low-income census tract and three branches in a moderate-income census tract. Branches in low- and moderate-income tracts exceeded the percentage of the population distribution of low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
<i>Full-Scope AA</i>						
Burlington-South Burlington VT MSA AA	0	2	0	0	-1	-1
<i>Limited-Scope AA</i>						
VT Non MSA AA	0	1	0	0	0	-1

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, CBNA closed three branches in Vermont, all of which were in the middle- or upper-income census tracts.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Most branches have extended hours on various days, and one branch in a low-income census tract and one branch in a moderate-income census tract have Saturday hours. Of the eight branches in middle- and upper-income census tracts, only one branch has Saturday hours.

Community Development Services

The institution provides a low level of CD services. During the evaluation period, 29 employees contributed 289 hours to 27 CD organizations but not primarily in a leadership role. Bank personnel provided financial and banking expertise to one affordable housing organization, 24 community service organizations, and two economic development organizations.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the VT Non MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope area.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/19 to 12/31/21	
Bank Products Reviewed:	Home mortgage, small business, and small farm Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Massachusetts		
Springfield MA MSA #44140	Full-scope	Hampden County (partial)
New York		
Albany-Schenectady-Troy NY MSA #10580	Limited-scope	Albany, Rensselaer, and Schoharie counties
Binghamton NY MSA #13780	Limited-scope	Tioga County and a portion of Broome County
Buffalo-Cheektowaga NY MSA #15380	Full-scope	Erie County
Elmira NY MSA #21300	Limited-scope	Chemung County
Glens Falls NY MSA #24020	Limited-scope	Portions of Warren and Washington counties
Ithaca NY MSA # 27060	Limited-scope	Tompkins County
Kingston NY MSA #28740	Limited-scope	Ulster County (partial)
Rochester NY MSA #40380	Full-scope	Livingston, Monroe, Ontario, Wayne, and Yates counties
Syracuse NY MSA #45060	Full-scope	Madison, Onondaga, and Oswego counties
Utica-Rome NY MSA #46540	Limited-scope	Oneida County and a portion of Herkimer County
Watertown-Fort Drum NY MSA #48060	Limited-scope	Jefferson County
NY Non MSA	Full-scope	Allegheny, Cattaraugus, Cayuga, Chautauqua, Chenango, Clinton, Columbia, Delaware, Essex, Franklin, Fulton, Lewis, Montgomery, Otsego, Schuyler, Seneca, St. Lawrence, and Steuben counties, and portions of Hamilton and Wyoming counties
Pennsylvania		
Allentown-Bethlehem-Easton PA MSA #10900	Limited-scope	Carbon County (partial)
Scranton-Wilkes Barre PA MSA #42540	Full-scope	Lackawanna, Luzerne, and Wyoming counties
PA Non MSA	Limited-scope	Susquehanna County and portions of Bradford and Schuylkill counties
Vermont		
Burlington-South Burlington VT MSA #15540	Full-scope	Chittenden, Franklin, and Grand Isle counties
VT Non MSA	Limited-scope	Bennington, Caledonia, Lamoille, Washington, Windham counties, and portions of Addison, Orange, Rutland, and Windsor counties

Appendix B: Summary of State Ratings

RATINGS		COMMUNITY BANK, N.A.		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Rating
CBNA	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State:				
Massachusetts	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
New York	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Pennsylvania	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Vermont	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests 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: 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: 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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.

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

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

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 loans are treated the same 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

State of Massachusetts

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21	
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	
Springfield MA MSA AA	40	9,083	100.0	17,141	7.1	17.5	8.9	18.0	37.5	19.1	32.0	12.5	31.6	42.8	32.5	40.4	0.0	0.0	0.0	
Total	40	9,083	100.0	17,141	7.1	17.5	8.9	18.0	37.5	19.1	32.0	12.5	31.6	42.8	32.5	40.4	0.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 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																			2019-21	
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	
Springfield MA MSA AA	40	9,083	100.0	17,141	28.3	-	7.1	16.5	10.0	24.7	17.3	10.0	23.1	37.9	32.5	27.7	0.0	47.5	17.5	
Total	40	9,083	100.0	17,141	28.3	-	7.1	16.5	10.0	24.7	17.3	10.0	23.1	37.9	32.5	27.7	0.0	47.5	17.5	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%*

State of Massachusetts

2019-21

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

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
Springfield MA MSA AA	117	22,714	100.0	9,697	21.6	19.7	20.1	22.1	38.5	20.7	22.4	27.4	24.2	33.9	14.5	35.0	0.0	0.0	0.0
Total	117	22,714	100.0	9,697	21.6	19.7	20.1	22.1	38.5	20.7	22.4	27.4	24.2	33.9	14.5	35.0	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%.

2019-21

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

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
Springfield MA MSA AA	117	22,714	100.0	9,697	84.2	18.8	35.7	5.2	35.0	10.6	46.2
Total	117	22,714	100.0	9,697	84.2	18.8	35.7	5.2	35.0	10.6	46.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%.

State of New York

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

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	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
Albany-Schenectady-Troy NY MSA AA	180	61,232	1.3	18,758	3.6	5.0	4.1	15.9	31.1	15.9	51.2	41.7	50.6	29.3	22.2	29.4	0.0	0.0	0.0
Binghamton NY MSA AA	188	17,830	1.3	5,027	3.7	0.5	3.2	12.8	6.4	12.8	47.9	67.6	44.5	35.6	25.5	39.6	0.0	0.0	0.0
Buffalo-Cheektowaga NY MSA AA	593	101,292	4.1	32,113	7.4	1.9	4.3	11.2	2.9	9.0	41.8	71.5	42.2	39.6	23.8	44.4	0.0	0.0	0.1
Elmira NY MSA AA	205	19,772	1.4	2,482	4.7	6.8	4.6	8.5	5.9	9.3	56.3	52.2	50.7	30.6	35.1	35.3	0.0	0.0	0.0
Glens Falls NY MSA AA	75	8,800	0.5	1,046	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Ithaca NY MSA AA	95	13,301	0.7	2,107	0.0	0.0	0.0	12.2	6.3	10.9	70.6	81.1	68.6	17.0	12.6	19.4	0.2	0.0	1.1
Kingston NY MSA AA	40	6,241	0.3	360	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
NY Non MSA AA	8,521	887,278	59.2	27,670	0.7	0.3	0.8	7.5	6.2	6.8	78.7	81.7	74.7	13.0	11.8	17.7	0.0	0.1	0.0
Rochester NY MSA AA	1,465	163,921	10.2	41,982	3.5	0.4	2.8	11.0	13.4	10.2	51.9	77.2	49.5	33.5	9.0	37.5	0.0	0.0	0.0
Syracuse NY MSA AA	1,381	158,614	9.6	21,325	2.6	0.4	2.0	14.0	22.2	12.8	51.7	54.8	49.4	31.6	22.6	35.8	0.1	0.0	0.1
Utica-Rome NY MSA AA	759	115,225	5.3	6,949	6.4	0.8	4.9	7.4	2.5	7.3	50.9	76.0	46.3	35.3	20.6	41.5	0.0	0.1	0.0
Watertown-Fort Drum NY MSA AA	884	108,311	6.1	3,885	0.0	0.0	0.0	7.9	6.6	9.5	83.2	84.0	82.2	8.9	9.4	8.2	0.0	0.0	0.1
Total	14,386	1,661,818	100.0	163,704	3.5	0.5	2.8	10.7	8.4	10.2	57.6	77.1	53.6	28.2	13.9	33.3	0.0	0.0	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "-" data not available.

Due to rounding, totals may not equal 100.0%

State of New York

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

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
Albany-Schenectady-Troy NY MSA AA	180	61,232	1.3	18,758	21.9	13.3	8.8	17.8	21.7	23.5	21.7	15.6	24.7	38.6	28.9	31.2	0.0	20.6	11.8
Binghamton NY MSA AA	188	17,830	1.3	5,027	22.7	12.8	7.2	16.4	29.3	19.5	20.6	27.7	22.9	40.2	22.9	35.4	0.0	7.4	15.1
Buffalo-Cheektowaga NY MSA AA	593	101,292	4.1	32,113	22.1	8.4	7.4	16.5	19.9	20.2	19.9	32.7	23.0	41.6	33.1	35.4	0.0	5.9	14.0
Elmira NY MSA AA	205	19,772	1.4	2,482	22.9	11.7	7.3	16.1	22.0	18.4	21.0	30.7	23.9	40.0	32.2	34.6	0.0	3.4	15.7
Glens Falls NY MSA AA	75	8,800	0.5	1,046	21.5	8.0	5.4	17.4	22.7	14.6	23.8	28.0	21.6	37.3	41.3	47.0	0.0	–	11.3
Ithaca NY MSA AA	95	13,301	0.7	2,107	21.0	17.9	7.3	16.7	21.1	18.7	21.2	27.4	23.6	41.0	31.6	42.6	0.0	2.1	7.8
Kingston NY MSA AA	40	6,241	0.3	360	21.6	7.5	5.8	16.8	17.5	11.7	23.8	47.5	19.4	37.8	25.0	58.9	0.0	2.5	4.2
NY Non MSA AA	8,521	887,278	59.2	27,670	21.4	8.4	6.2	17.9	21.8	18.1	21.6	27.1	22.4	39.1	39.2	41.3	0.0	3.7	11.9
Rochester NY MSA AA	1,465	163,921	10.2	41,982	21.7	12.5	9.4	17.0	29.6	22.2	19.8	24.7	22.5	41.5	29.6	33.3	0.0	3.6	12.6
Syracuse NY MSA AA	1,381	158,614	9.6	21,325	21.8	9.7	9.0	17.2	22.1	20.8	20.4	25.9	23.1	40.6	34.8	35.0	0.0	7.5	12.1
Utica-Rome NY MSA AA	759	115,225	5.3	6,949	22.2	7.9	8.0	15.9	21.2	19.0	21.2	24.2	24.2	40.6	40.7	37.5	0.0	5.9	11.3
Watertown-Fort Drum NY MSA AA	884	108,311	6.1	3,885	19.8	5.5	4.1	18.3	15.3	14.1	22.4	22.7	23.9	39.5	51.5	43.0	0.0	5.0	14.9
Total	14,386	1,661,818	100.0	163,704	21.8	8.9	8.0	17.1	22.2	20.5	20.7	26.5	23.0	40.4	37.8	35.8	0.0	4.5	12.6

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

State of New York

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

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
Albany-Schenectady-Troy NY MSA AA	280	59,600	4.3	10,758	18.9	8.9	13.9	14.1	8.6	12.8	41.8	51.1	45.0	25.1	31.4	28.2	0.2	0.0	0.1
Binghamton NY MSA AA	77	10,668	1.2	2,751	12.3	9.1	12.6	15.0	20.8	16.0	47.8	61.0	48.7	25.0	9.1	22.7	0.0	0.0	0.0
Buffalo-Cheektowaga NY MSA AA	284	39,886	4.4	21,951	10.9	4.2	9.3	11.3	5.6	9.7	33.4	50.7	34.5	39.6	37.0	43.1	4.8	2.5	3.3
Elmira NY MSA AA	61	8,226	0.9	947	19.2	23.0	20.0	11.3	13.1	14.5	41.3	32.8	39.1	28.1	31.1	26.5	0.1	0.0	0.0
Glens Falls NY MSA AA	38	1,834	0.6	619	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Ithaca NY MSA AA	13	1,698	0.2	1,830	0.0	0.0	0.0	15.5	46.2	16.4	48.4	53.8	47.9	33.6	0.0	32.8	2.6	0.0	2.8
Kingston NY MSA AA	19	1,074	0.3	196	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
NY Non MSA AA	3,358	345,772	51.9	16,689	2.8	0.9	3.0	10.3	9.0	9.6	70.2	76.1	71.1	16.5	13.9	16.2	0.2	0.1	0.1
Rochester NY MSA AA	724	69,480	11.2	22,197	9.7	0.7	8.3	12.5	16.3	10.7	43.1	74.0	43.7	34.5	9.0	37.2	0.2	0.0	0.1
Syracuse NY MSA AA	789	90,939	12.2	12,658	8.1	1.1	6.8	14.0	22.1	13.3	42.4	46.8	44.9	33.3	29.7	32.6	2.2	0.4	2.3
Utica-Rome NY MSA AA	383	40,625	5.9	3,802	15.4	1.3	14.5	13.0	7.3	13.0	38.2	56.7	35.7	31.8	33.9	34.9	1.7	0.8	2.0
Watertown-Fort Drum NY MSA AA	441	47,276	6.8	2,195	0.0	0.0	0.0	17.6	14.5	14.5	75.6	80.7	80.0	6.8	4.8	5.5	0.0	0.0	0.0
Total	6,467	717,078	100.0	96,593	9.6	1.7	8.1	12.4	11.7	11.2	47.0	68.9	47.8	29.5	17.6	31.6	1.5	0.2	1.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%

State of New York

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	
Albany-Schenectady-Troy NY MSA AA	280	59,600	4.3	10,758	84.3	21.1	35.3	4.4	32.5	11.3	46.4	
Binghamton NY MSA AA	77	10,668	1.2	2,751	82.9	24.7	35.0	4.9	23.4	12.2	51.9	
Buffalo-Cheektowaga NY MSA AA	284	39,886	4.4	21,951	84.8	22.9	38.6	5.1	20.8	10.1	56.3	
Elmira NY MSA AA	61	8,226	0.9	947	79.0	21.3	30.4	5.4	11.5	15.6	67.2	
Glens Falls NY MSA AA	38	1,834	0.6	619	85.8	28.9	27.1	3.6	5.3	10.6	65.8	
Ithaca NY MSA AA	13	1,698	0.2	1,830	84.6	38.5	33.7	4.0	23.1	11.4	38.5	
Kingston NY MSA AA	19	1,074	0.3	196	91.0	36.8	36.2	2.5	15.8	6.5	47.4	
NY Non MSA AA	3,358	345,772	51.9	16,689	81.8	30.5	29.9	4.6	15.5	13.6	54.0	
Rochester NY MSA AA	724	69,480	11.2	22,197	85.5	35.4	32.4	4.7	14.0	9.8	50.7	
Syracuse NY MSA AA	789	90,939	12.2	12,658	83.7	23.1	34.1	5.0	20.8	11.3	56.1	
Utica-Rome NY MSA AA	383	40,625	5.9	3,802	82.9	27.7	31.7	5.1	16.7	12.1	55.6	
Watertown-Fort Drum NY MSA AA	441	47,276	6.8	2,195	79.3	31.7	32.2	5.1	15.6	15.6	52.6	
Total	6,467	717,078	100.0	96,593	83.9	29.2	33.9	4.8	17.0	11.4	53.8	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%

State of New York

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Albany-Schenectady-Troy NY MSA AA	3	37	0.4	79	2.9	0.0	0.0	16.1	100.0	24.1	58.5	0.0	60.8	22.4	0.0	15.2	0.1	0.0	0.0
Binghamton NY MSA AA	16	698	1.9	36	2.9	0.0	0.0	8.0	0.0	0.0	60.1	81.3	75.0	29.0	18.8	25.0	0.0	0.0	0.0
Buffalo-Cheektowaga NY MSA AA	29	3,332	3.5	129	4.4	0.0	0.0	5.1	0.0	1.6	42.1	82.8	65.9	46.7	17.2	32.6	1.7	0.0	0.0
Elmira NY MSA AA	3	156	0.4	10	3.3	0.0	0.0	7.6	0.0	0.0	64.7	66.7	90.0	24.5	33.3	10.0	0.0	0.0	0.0
Glens Falls NY MSA AA	0	0	0.0	8	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Ithaca NY MSA AA	1	75	0.1	34	0.0	0.0	0.0	12.4	0.0	23.5	73.5	100.0	64.7	13.8	0.0	11.8	0.3	0.0	0.0
Kingston NY MSA AA	1	8	0.1	3	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
NY Non MSA AA	485	32,907	58.6	969	0.2	0.0	0.2	4.3	1.4	5.2	82.1	87.0	84.6	13.4	11.5	10.0	0.0	0.0	0.0
Rochester NY MSA AA	198	17,614	23.9	342	2.2	0.0	0.0	7.8	7.1	8.5	64.7	90.9	82.5	25.4	2.0	9.1	0.0	0.0	0.0
Syracuse NY MSA AA	34	2,151	4.1	174	2.0	0.0	0.0	12.7	26.5	12.1	50.9	52.9	54.6	33.8	20.6	32.8	0.6	0.0	0.6
Utica-Rome NY MSA AA	27	1,172	3.3	61	1.3	0.0	1.6	3.1	0.0	0.0	59.4	77.8	65.6	36.2	22.2	32.8	0.0	0.0	0.0
Watertown-Fort Drum NY MSA AA	31	3,389	3.7	68	0.0	0.0	0.0	5.2	0.0	0.0	81.9	87.1	86.8	12.9	12.9	13.2	0.0	0.0	0.0
Total	828	61,539	100.0	1,913	1.7	0.0	0.2	7.3	4.0	6.7	66.5	85.6	78.3	24.2	10.4	14.7	0.3	0.0	0.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%

State of New York

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albany-Schenectady-Troy NY MSA AA	3	37	0.4	79	98.5	33.3	54.4	1.0	0.0	0.5	66.7
Binghamton NY MSA AA	16	698	1.9	36	98.4	43.8	52.8	1.0	12.5	0.5	43.8
Buffalo-Cheektowaga NY MSA AA	29	3,332	3.5	129	96.2	44.8	35.7	2.3	17.2	1.5	37.9
Elmira NY MSA AA	3	156	0.4	10	97.8	33.3	30.0	0.5	0.0	1.6	66.7
Glens Falls NY MSA AA	–	–	–	8	96.8	–	75.0	2.1	–	1.1	–
Ithaca NY MSA AA	1	75	0.1	34	95.9	100.0	32.4	2.8	0.0	1.4	0.0
Kingston NY MSA AA	1	8	0.1	3	100.0	0.0	100.0	0.0	0.0	0.0	100.0
NY Non MSA AA	485	32,907	58.6	969	97.0	65.8	43.2	2.2	7.0	0.8	27.2
Rochester NY MSA AA	198	17,614	23.9	342	95.7	68.7	33.3	2.9	14.1	1.4	17.2
Syracuse NY MSA AA	34	2,151	4.1	174	95.8	44.1	37.9	2.4	2.9	1.8	52.9
Utica-Rome NY MSA AA	27	1,172	3.3	61	96.9	74.1	49.2	0.8	3.7	2.3	22.2
Watertown-Fort Drum NY MSA AA	31	3,389	3.7	68	96.6	51.6	26.5	2.1	0.0	1.3	48.4
Total	828	61,539	100.0	1,913	96.7	63.9	40.7	2.2	8.6	1.2	27.5

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%*

State of Pennsylvania

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
Allentown-Bethlehem-Easton PA MSA AA	80	6,706	3.8	1,362	9.0	12.5	4.6	28.1	27.5	27.9	62.9	60.0	67.5	0.0	0.0	0.0	0.0	0.0	0.0
PA Non MSA AA	266	29,442	12.5	2,170	0.0	0.0	0.0	13.6	7.5	11.7	76.9	79.3	78.3	9.6	13.2	10.0	0.0	0.0	0.0
Scranton-Wilkes-Barre PA MSA AA	1,780	198,439	83.7	19,384	1.6	3.3	1.5	14.2	17.3	13.6	56.5	55.5	51.8	27.6	23.8	33.0	0.0	0.1	0.1
Total	2,126	234,587	100.0	22,916	1.9	3.2	1.5	15.0	16.5	14.3	59.5	58.7	55.2	23.6	21.6	28.9	0.0	0.0	0.1

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 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
Allentown-Bethlehem-Easton PA MSA AA	80	6,706	3.8	1,362	28.5	26.3	15.4	20.8	30.0	22.5	23.1	30.0	20.9	27.7	8.8	23.2	0.0	5.0	17.9
PA Non MSA AA	266	29,442	12.5	2,170	19.3	9.8	5.7	18.0	17.7	17.1	21.1	30.1	20.8	41.6	37.6	37.8	0.0	4.9	18.5
Scranton-Wilkes-Barre PA MSA AA	1,780	198,439	83.7	19,384	21.3	12.6	8.2	17.6	25.6	18.0	20.5	26.5	20.5	40.6	29.4	34.4	0.0	6.0	18.9
Total	2,126	234,587	100.0	22,916	21.5	12.7	8.4	17.9	24.7	18.2	20.7	27.0	20.6	39.9	29.7	34.0	0.0	5.8	18.8

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%*

State of Pennsylvania

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2019-21		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Allentown MSA AA	21	1,227	1.5	496	7.3	9.5	4.4	27.3	61.9	35.3	65.4	28.6	60.3	0.0	0.0	0.0	0.0	0.0	0.0	
PA Non MSA AA	162	27,933	11.5	1,281	0.0	0.0	0.0	12.1	1.9	8.4	73.2	66.7	77.9	14.8	31.5	13.7	0.0	0.0	0.0	
Scranton–Wilkes-Barre PA MSA AA	1,226	161,311	87.0	11,300	2.8	1.2	2.4	19.4	13.5	17.8	51.2	63.2	51.7	24.6	20.6	26.5	2.1	1.6	1.5	
Total	1,409	190,471	100.0	13,077	2.7	1.2	2.3	19.0	12.8	17.5	54.0	63.1	54.6	22.5	21.5	24.2	1.8	1.3	1.3	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 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												2019-21	
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Allentown-Bethlehem-Easton PA MSA AA	21	1,227	1.5	496	85.6	28.6	38.5	3.0	19.0	11.4	52.4		
PA Non MSA AA	162	27,933	11.5	1,281	87.1	29.0	32.5	3.2	38.3	9.6	32.7		
Scranton–Wilkes-Barre PA MSA AA	1,226	161,311	87.0	11,300	86.5	23.7	31.7	4.0	27.4	9.6	48.9		
Total	1,409	190,471	100.0	13,077	86.5	24.4	32.1	3.9	28.5	9.7	47.1		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%

State of Vermont

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
Burlington-South Burlington VT MSA AA	340	128,229	37.1	11,506	1.0	2.4	1.3	13.2	25.0	13.9	65.6	55.9	64.1	20.2	16.8	20.7	0.0	0.0	0.0
VT Non MSA AA	577	67,506	62.9	13,132	0.0	0.0	0.0	6.9	5.5	4.9	77.1	78.0	73.4	16.1	16.5	21.6	0.0	0.0	0.0
Total	917	195,735	100.0	24,638	0.4	0.9	0.6	9.1	12.8	9.1	73.0	69.8	69.1	17.5	16.6	21.2	0.0	0.0	0.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 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
Burlington-South Burlington VT MSA AA	340	128,229	37.1	11,506	20.5	11.5	7.2	17.9	15.9	20.9	23.1	22.6	24.1	38.5	30.0	37.3	0.0	20.0	10.5
VT Non MSA AA	577	67,506	62.9	13,132	19.1	8.5	5.0	18.0	23.2	16.7	22.4	26.0	20.0	40.5	35.0	46.9	0.0	7.3	11.5
Total	917	195,735	100.0	24,638	19.6	9.6	6.0	18.0	20.5	18.6	22.6	24.8	21.9	39.8	33.2	42.4	0.0	12.0	11.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%*

State of Vermont

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21	
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	
Burlington-South Burlington VT MSA AA	745	121,216	61.6	5,673	0.9	0.8	0.8	23.5	25.5	22.7	53.9	52.6	52.2	21.6	20.5	24.0	0.2	0.5	0.4	
VT Non MSA AA	465	59,179	38.4	8,320	0.0	0.0	0.0	9.0	7.5	8.2	73.5	71.2	70.6	17.5	21.3	21.2	0.0	0.0	0.0	
Total	1,210	180,395	100.0	13,993	0.4	0.5	0.3	14.9	18.6	14.1	65.4	59.8	63.1	19.2	20.8	22.3	0.1	0.3	0.1	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 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												2019-21	
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		
Burlington-South Burlington VT MSA AA	745	121,216	61.6	5,673	88.6	18.9	33.4	4.0	24.3	7.4	56.8		
VT Non MSA AA	465	59,179	38.4	8,320	86.9	19.1	31.1	4.1	18.3	9.0	62.6		
Total	1,210	180,395	100.0	13,993	87.6	19.0	32.0	4.1	22.0	8.4	59.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%