



PUBLIC DISCLOSURE

July 1, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Delaware National Bank of Delhi
Charter Number 1323

124 Main Street
Delhi, New York 13753

Office of the Comptroller of the Currency

5000 Brittonfield Parkway
Suite 102B
East Syracuse, New York 13057

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the bank's performance in the state of New York which includes a single assessment area (AA).
- A substantial majority of home mortgage loans originated during the review period were originated inside the bank's AA.
- The Delaware National Bank of Delhi (DNBD) had a reasonable loan-to-deposit (LTD) ratio during the evaluation period.
- The bank had a reasonable distribution of home mortgage loans to borrowers of different income levels within the AA.
- The bank had a reasonable distribution of home mortgage loans among census tracts of different income designations within the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The bank's average quarterly LTD ratio since the prior CRA evaluation through December 31, 2018, was 59.96 percent. In comparison, four similarly situated banks had an average quarterly LTD ratio of 60.65 percent, with ratios ranging from a low of 33.16 percent to a high of 89.12 percent during the same period.

Lending in Assessment Area

A substantial majority of the bank's home mortgage loans originated during the evaluation period are inside its AA.

The bank originated and purchased 93.2 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Refer to the table below for further detail.

| Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|--|------------------------|----------|----------------|----------|--------------|--|----------|----------------|----------|--------------|
| Loan Category | Number of Loans | | | | Total | Dollar Amount of Loans \$(000s) | | | | Total |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | 385 | 93.2 | 28 | 6.8 | 413 | 37,815 | 92.5 | 3,055 | 7.5 | 40,870 |

| | | | | | | | | | | |
|--|-----|------|----|-----|-----|--------|------|-------|-----|--------|
| Total | 385 | 93.2 | 28 | 6.8 | 413 | 37,815 | 92.5 | 3,055 | 7.5 | 40,870 |
| <i>Source: Evaluation Period: 4/1/2016 - 12/31/2018 Bank Data. Action is Originated or Purchased</i> | | | | | | | | | | |

Description of Institution

DNBD is a \$295 million community bank headquartered in Delhi, New York (NY). The bank is wholly owned by Delhi Bank Corp. (DWNX), which has \$295 million in assets and is also headquartered in Delhi, NY. DNBD operates three full service branches located in Margaretville, Davenport, and Hobart, NY, in addition to the main office in Delhi. DNBD's four locations are within Delaware County in New York's Southern Tier region which borders Pennsylvania to the south. All branches have automated teller machines (ATM) on premises. The bank also has two loan production offices (LPO), located in Sidney and Oneonta, NY, which are within Delaware and Otsego Counties, respectively. The Sidney, NY LPO opened in the Spring of 2017. Since the prior CRA evaluation, DNBD did not open or close any branches and was not part of a merger or acquisition.

DNBD offers a variety of traditional consumer, commercial and agricultural banking products and services, as well as, trust services. The bank's primary focus is on home mortgage loans. Commercial and agricultural loans consist primarily of loans purchased from the U.S. Department of Agriculture (USDA) Rural Development program and Small Business Administration (SBA) loans. The bank offers online and mobile banking services and features including deposit transfer (internal and external), remote deposit capture, and bill pay.

As of December 31, 2018, DNBD has \$174 million in total loans, representing 59 percent of assets. The bank's loan portfolio mix primarily consists of 50 percent home mortgage loans, 28 percent commercial loans, 20 percent agriculture loans and 2 percent consumer loans. Tier 1 capital totals \$29 million.

DNBD has one AA in the state of New York consisting of the entirety of Delaware and Otsego Counties. The AA is located in a non-Metropolitan Statistical Area (non-MSA). The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas.

DNBD has no legal, financial, or other impediments hindering its ability to help meet the credit needs in its assessment area. DNBD's last CRA evaluation was dated July 5, 2016, at which time the bank's performance was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated DNBD's CRA performance using Small Bank evaluation procedures. The Small Bank procedures include a Lending Test, which evaluates the bank's record of meeting the credit needs of its AA through its lending activities.

The Lending Test includes an evaluation of the bank's primary product, home mortgage loans, from April 1, 2016, through December 31, 2018. We evaluated performance using the 2010 U.S. Census data for loans originated in 2016 and the 2015 American Community Survey (ACS) U.S. Census data for loans originated in 2017-2018.

DNBD maintains a loan application register (LAR) consistent with the requirements of HMDA. DNBD is not required to submit and file the data as none of its offices are located in an MSA. Examiners completed a data integrity examination of the 2016, 2017, and 2018 HMDA LAR in advance of this evaluation and found the data to be reliable. As a result, examiners relied on the HMDA LAR data to assess the bank's lending performance.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. For DNBD, the overall rating is based on the bank's home mortgage lending activity in its only AA, the Non-MSA AA located in New York State.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank had a reasonable distribution of home mortgage loans to borrowers of different income levels within the AA.
- The bank had a reasonable distribution of home mortgage loans among census tracts of different income designations within the AA.

Description of Institution's Operations in New York State

DNBD's main office and three full service branches are within Delaware County in New York's Southern Tier region which borders Pennsylvania to the south. The bank also has two LPOs, located in Sidney and Oneonta, NY, which are within Delaware and Otsego Counties, respectively.

The main office and each branch location have an ATM with a drive-up facility at the main office. DNBD does not have any offsite ATMs. Banking hours are 9:00 a.m. to 5:00 p.m. Monday through Friday, and 9:00 a.m. to 12:00 p.m. Saturdays at the main and all branch locations.

DNBD offers a variety of traditional and non-complex products and services, with a primary focus on retail lending products. The bank's retail loan products are heavily concentrated in home mortgage loans, including fixed and adjustable rate mortgages, construction loans, and home equity lines of credit and loans.

The bank's only AA, the non-MSA AA, consists of the entirety of Delaware and Otsego Counties. Refer to Table A for demographic information for the AA. The AA consists of five upper-income tracts, 22 middle-income tracts, two moderate-income tracts, and two tracts which had not been assigned an income level. The AA does not include any low-income tracts. Since the last evaluation the AA boundaries changed to include all of Otsego County, where previously only Delaware County was included. In addition, changes to the census information between the 2010 U. S. Census and the 2015 ACS U. S. Census (effective January 1, 2017) changed the income designation of two CTs from middle-income tracts to moderate-income tracts. Management did not arbitrarily exclude any low- or moderate-income tracts from the AA.

Delaware and Otsego Counties are located in Central New York State on the western edge of the Catskill Mountains. The counties cover 2,462 square miles. Delaware County contains the largest unfiltered water supply in the United States, supplying water to New York City and parts of Westchester, Putnam, Orange, and Ulster Counties. Population density is low within Delaware County with a population density of only 32 persons per square mile, while Otsego County is higher at 62 persons per square mile. Regulatory limitations on development within the Catskill/Delaware Watershed limits the economic development opportunities and employment within the county.

The AA's economic condition has improved since the prior evaluation. The AA's unemployment rate decreased from 4.9 percent at the last CRA evaluation to 3.7 percent as of May 2019. The unemployment rate is comparable to that of New York State, which decreased from 4.7 percent to 3.8 percent during the same time period.

Major employers in Delaware and Otsego Counties include local governments, school districts, State University of New York (SUNY) Oneonta, and SUNY Delhi. Other significant employers in the AA include the following: Amphenol Corp and ACCO Brands (both in Sidney), A.O. Fox Hospital in Oneonta, Bassett Healthcare Network in Cooperstown, Mallinckrodt Pharmaceuticals in Hobart, Kraft Heinz Foods Company in Walton, and Saputo Dairy Foods (Morningstar Foods) in Delhi.

According to the most recent Federal Deposit Insurance Corporation (FDIC) Market Share data as of June 30, 2018, DNBD is fourth in market share with \$262 million in deposits or 12 percent of the deposit market share in Delaware and Otsego counties. Primary competitors for deposits include NBT Bank, N.A., Community Bank, N.A., Wayne Bank, and KeyBank.

We contacted a local community organization servicing Delaware County, NY. The contact indicated a need for affordable mortgage loans; however, regulatory restrictions on development within the watershed limit building. Therefore, participation in housing programs is limited.

Non-MSA AA

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Non-MSA AA 2010 Census | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 31 | 0.0 | 0.0 | 87.1 | 6.5 | 6.5 |
| Population by Geography | 110,239 | 0.0 | 0.0 | 88.6 | 7.9 | 3.5 |
| Housing Units by Geography | 61,615 | 0.0 | 0.0 | 93.4 | 6.6 | 0.0 |
| Owner-Occupied Units by Geography | 33,331 | 0.0 | 0.0 | 93.0 | 6.9 | 0.0 |
| Occupied Rental Units by Geography | 11,705 | 0.0 | 0.0 | 87.8 | 12.2 | 0.0 |
| Vacant Units by Geography | 16,579 | 0.0 | 0.0 | 98.1 | 1.9 | 0.0 |
| Businesses by Geography | 5,852 | 0.0 | 0.0 | 91.0 | 8.8 | 0.2 |
| Farms by Geography | 521 | 0.0 | 0.0 | 98.3 | 1.7 | 0.0 |
| Family Distribution by Income Level | 28,885 | 18.5 | 18.0 | 23.5 | 40.0 | 0.0 |
| Household Distribution by Income Level | 45,036 | 23.9 | 17.0 | 18.4 | 40.7 | 0.0 |
| Median Family Income Non-MSAs - NY | | \$54,386 | Median Housing Value | | | \$136,423 |
| | | | Median Gross Rent | | | \$677 |
| | | | Families Below Poverty Level | | | 9.2% |

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

Table A – Demographic Information of the Assessment Area**Assessment Area: Non-MSA AA 2015 ACS Census**

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|--|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Geographies (Census Tracts) | 31 | 0.0 | 6.5 | 71.0 | 16.1 | 6.5 |
| Population by Geography | 108,300 | 0.0 | 7.9 | 73.8 | 13.9 | 4.4 |
| Housing Units by Geography | 61,867 | 0.0 | 7.6 | 80.5 | 11.8 | 0.1 |
| Owner-Occupied Units by Geography | 31,352 | 0.0 | 7.1 | 81.5 | 11.3 | 0.1 |
| Occupied Rental Units by Geography | 11,546 | 0.0 | 15.4 | 65.0 | 19.5 | 0.1 |
| Vacant Units by Geography | 18,969 | 0.0 | 3.8 | 88.2 | 8.0 | 0.0 |
| Businesses by Geography | 5,657 | 0.0 | 11.1 | 67.9 | 20.5 | 0.5 |
| Farms by Geography | 492 | 0.0 | 3.0 | 86.2 | 10.8 | 0.0 |
| Family Distribution by Income Level | 26,689 | 20.1 | 19.1 | 22.1 | 38.7 | 0.0 |
| Household Distribution by Income Level | 42,898 | 25.3 | 16.6 | 18.4 | 39.8 | 0.0 |
| Median Family Income Non-MSAs - NY | | \$59,570 | Median Housing Value | | | \$142,383 |
| | | | Median Gross Rent | | | \$729 |
| | | | Families Below Poverty Level | | | 10.1% |

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in New York

DNBD's state rating is based on the bank's home mortgage lending activity in its only AA in the state, the Non-MSA AA. The assessment of lending performance is weighted equally for 2016, 2017 and 2018.

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AA.

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 reflects a reasonable distribution among census tracts of different income levels. In 2016, the bank's AA did not include any low- or moderate-income

census tracts; therefore, an analysis of geographic distribution would not be meaningful. Following the 2015 ACS, which became effective in 2017, the AA included two moderate-income census tracts.

In 2017, the geographic distribution of home mortgage loans reflects reasonable distribution among census tracts of different income levels. The geographic distribution of home mortgage loans in moderate-income tracts is reasonable compared to the owner-occupied housing and aggregate lending in those tracts.

In 2018, the geographic distribution of home mortgage loans reflects reasonable distribution among census tracts of different income levels. The geographic distribution of home mortgage loans in moderate-income tracts is reasonable compared to the owner-occupied housing and aggregate lending in those tracts.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of home mortgage loans to individuals of different income levels given the product lines offered by the bank.

Home Mortgage Loans

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

The distribution of home mortgage loans to individuals of different income levels is reasonable. The distribution of home mortgage loans to low-income borrowers is reasonable. The distribution of home mortgage loans to moderate-income borrowers is excellent.

In 2016, the distribution of home mortgage loans to individuals of different income levels is reasonable. The distribution of home mortgage loans to low-income borrowers is poor compared to the distribution of low-income families. The distribution of home mortgage loans to low-income borrowers is excellent compared to aggregate lending data. The distribution of home mortgage loans to moderate-income borrowers is excellent compared to the distribution of moderate-income families and compared to aggregate lending data.

In 2017, the distribution of home mortgage loans to individuals of different income levels is reasonable. The distribution of home mortgage loans to low-income borrowers is reasonable compared to the distribution of low-income families. The distribution of home mortgage loans to low-income borrowers is excellent compared to aggregate lending data. The distribution of home mortgage loans to moderate-income borrowers is excellent. The distribution of home mortgage loans to moderate-income borrowers is excellent compared to the distribution of moderate-income families and compared to aggregate lending data.

In 2018, the distribution of home mortgage loans to individuals of different income levels is reasonable. The distribution of home mortgage loans to low-income borrowers is reasonable compared to the distribution of low-income families. The distribution of home mortgage loans to low-income borrowers is excellent compared to aggregate lending data. The distribution of home mortgage loans to moderate-income borrowers is excellent. The distribution of home mortgage loans to moderate-income borrowers

is excellent compared to the distribution of moderate-income families and compared to aggregate lending data.

Responses to Complaints

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

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: | 07/05/2016 to 12/31/2018 | |
| Bank Products Reviewed: | Home mortgage loans | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | N/A | N/A |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| New York | | |
| Non-MSA AA | Full Scope | The entirety of Delaware and Otsego Counties in NY |

Appendix B: Summary of MMSA and State Ratings

| RATINGS Delaware National Bank of Delhi | |
|---|---------------------|
| Overall Bank: | Lending Test Rating |
| Delaware National Bank of Delhi | Satisfactory |
| MMSA or State: | |
| New York | Satisfactory |

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

Table O for 2016 is not applicable. The AA did not include low- or moderate-income CTs during that timeframe.

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2017 |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|-------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Non-MSA AA | 122 | 11,966 | 100.0 | 1,636 | 0.0 | 0.0 | 0.0 | 7.1 | 5.7 | 7.3 | 81.5 | 77.0 | 78.4 | 11.3 | 16.4 | 14.2 | 0.1 | 0.8 | 0.1 | |
| Total | 122 | 11,966 | 100.0 | 1,636 | 0.0 | 0.0 | 0.0 | 7.1 | 5.7 | 7.3 | 81.5 | 77.0 | 78.4 | 11.3 | 16.4 | 14.2 | 0.1 | 0.8 | 0.1 | |

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

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2018 |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|-------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Non-MSA AA | 138 | 14,449 | 100.0 | 1,747 | 0.0 | 0.0 | 0.0 | 7.1 | 5.8 | 6.7 | 81.5 | 78.3 | 78.4 | 11.3 | 15.9 | 14.9 | 0.1 | 0.0 | 0.1 | |
| Total | 138 | 14,449 | 100.0 | 1,747 | 0.0 | 0.0 | 0.0 | 7.1 | 5.8 | 6.7 | 81.5 | 78.3 | 78.4 | 11.3 | 15.9 | 14.9 | 0.1 | 0.0 | 0.1 | |

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

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2016 |
|--|----------------------------------|---------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|
| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| Assessment Area: | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Non-MSA AA | 125 | 11,400 | 100.0 | 1,611 | 18.5 | 5.6 | 6.2 | 18.0 | 19.2 | 17.9 | 23.5 | 24.0 | 20.5 | 40.0 | 44.8 | 43.0 | 0.0 | 6.4 | 12.5 |
| Total | 125 | 11,400 | 100.0 | 1,611 | 18.5 | 5.6 | 6.2 | 18.0 | 19.2 | 17.9 | 23.5 | 24.0 | 20.5 | 40.0 | 44.8 | 43.0 | 0.0 | 6.4 | 12.5 |

*Source: 2010 U.S Census; 04/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2017 |
|--|----------------------------------|---------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|
| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| Assessment Area: | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Non-MSA AA | 122 | 11,966 | 100.0 | 1,636 | 20.1 | 8.2 | 7.2 | 19.1 | 20.5 | 18.0 | 22.1 | 21.3 | 22.1 | 38.7 | 43.4 | 42.3 | 0.0 | 6.6 | 10.4 |
| Total | 122 | 11,966 | 100.0 | 1,636 | 20.1 | 8.2 | 7.2 | 19.1 | 20.5 | 18.0 | 22.1 | 21.3 | 22.1 | 38.7 | 43.4 | 42.3 | 0.0 | 6.6 | 10.4 |

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

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | | 2018 |
|--|----------------------------------|---------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|-------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Non-MSA AA | 138 | 14,449 | 100.0 | 1,747 | 20.1 | 10.1 | 7.7 | 19.1 | 19.6 | 15.8 | 22.1 | 26.1 | 21.4 | 38.7 | 39.1 | 45.8 | 0.0 | 5.1 | 9.3 | |
| Total | 138 | 14,449 | 100.0 | 1,747 | 20.1 | 10.1 | 7.7 | 19.1 | 19.6 | 15.8 | 22.1 | 26.1 | 21.4 | 38.7 | 39.1 | 45.8 | 0.0 | 5.1 | 9.3 | |

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