

PUBLIC DISCLOSURE

October 31, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Adirondack Bank
RSSD No. 101671

185 Genesee St.
Utica, NY 13501

FEDERAL RESERVE BANK OF NEW YORK

33 LIBERTY STREET
NEW YORK, NY 10045

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, nor should it 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.

TABLE OF CONTENTS

INSTITUTION'S CRA RATING	3
SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS	3
SCOPE OF EXAMINATION.....	3
DESCRIPTION OF INSTITUTION	5
CONCLUSION WITH RESPECT TO PERFORMANCE TESTS.....	8
MSA 46540 (UTICA-ROME, NY) - FULL REVIEW.....	13
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	13
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	18
NON-METROPOLITAN ASSESSMENT AREA - FULL REVIEW	30
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	30
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	35
MSA 45060 (SYRACUSE) - LIMITED REVIEW	45
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	45
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	45
NON-METROPOLITAN ASSESSMENT AREA (LEWIS COUNTY) - LIMITED REVIEW.....	47
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	47
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	47
APPENDICES	
CRA APPENDIX A: AGGREGATE COMPARISON LOAN DISTRIBUTION TABLES	49
CRA APPENDIX B: ASSESSMENT AREA MAPS.....	77
CRA APPENDIX C: GLOSSARY	79

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the satisfactory performance rating for Adirondack Bank (“Adirondack” or “the bank”) with regard to the Community Reinvestment Act (“CRA”) include the following:

- The loan-to-deposit ratio was reasonable given the bank’s size, financial condition, and assessment areas credit needs;
- A substantial majority of loans and other lending-related activities were made in the bank's assessment areas;
- Reasonable penetration among individuals of different income (including low- and moderate-income) levels and businesses of different sizes;
- The geographic distribution of loans reflected reasonable dispersion throughout the assessment area; and
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank’s community development performance demonstrated excellent responsiveness to community development needs of its assessment areas, through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and the availability of such opportunities for community development in the bank’s assessment areas.

SCOPE OF EXAMINATION

Procedures

Adirondack's CRA performance was evaluated using the Federal Financial Institutions Examination Council's (“FFIEC”) Interagency Intermediate Small Institution Examination Procedures. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, market competition, assessment area demographics and credit and community development needs. The bank is not a CRA Small Business reporter and as such, a sample of small business loans originated from January 1, 2021, through December 31, 2021 was analyzed as a representative sample for the examination review period.

As shown in the table below, the lending test evaluation covered the period from January 1, 2016 to December 31, 2021. The evaluation period for Adirondack’s community development activities was from January 1, 2017 to June 30, 2022.

PERFORMANCE CRITERION	EVALUATION PERIOD
Loan-to-Deposit Ratio	January 1, 2017 - September 30, 2022
Lending in Assessment Area	January 1, 2016 - December 31, 2021
Borrower Distribution of Loans	January 1, 2016 - December 31, 2021
Geographic Distribution of Loans	January 1, 2016 - December 31, 2021
Response to CRA Complaints	January 1, 2016 - December 31, 2021
Community Development Lending	January 1, 2017 - June 30, 2022
Qualified Investment and Donations	January 1, 2017 - June 30, 2022
Community Development Services	January 1, 2017 - June 30, 2022

Products

Retail products evaluated included home purchase, home refinance, home improvement, and small business loans. Home mortgage loans were reported under the Home Mortgage Disclosure Act (“HMDA”). Since the bank is not a CRA Small Business reporter, a sample of 104 small business loans originated in 2021 was selected as a representative sample of the bank’s small business lending throughout the examination review period. Examiners verified the integrity of HMDA data from January 1, 2016 through December 31, 2021, and small business data from January 1, 2021 through December 31, 2021. Multifamily loans were excluded from the evaluation as the volume was too low for a meaningful analysis. However, multifamily loans were considered in the evaluation of community development lending.

Examiners also reviewed community development loans, qualified investments and donations, and community development services. Peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution. Local peer banks were selected based on asset size, deposits, branching structure, and presence within Adirondack’s assessment areas. Additionally, as Adirondack met the needs of its assessment areas, examiners considered community development activities that were conducted in the broader statewide or regional area ("BSRA") that included its assessment areas. In addition, in accordance with CA Letter 21-5 Community Reinvestment Act (“CRA”) Consideration for Activities in Response to the Coronavirus, and its attachments, Small Business Administration (“SBA”) Paycheck Protection Program (“PPP”) loans and qualified community development activities supporting community needs related to the COVID-19 pandemic located outside of the assessment or BSRA were also given consideration.

Lending Distribution Analysis

The analyses of borrower and geographic distribution were based on loans made in Adirondack's assessment areas. To evaluate the geographic distribution of HMDA related loans, the proportion of loan originations in low- and moderate-income (“LMI”) and non-LMI geographies were compared with the proportion of owner-occupied housing units in LMI and non-LMI geographies. Regarding small business loans, the analysis compared the proportion of loan originations with the proportion of small businesses located in LMI and non-LMI geographies as reported by Dun and

Bradstreet ("D&B"). Performance related to the geographic distribution in low-income geographies was analyzed separately from performance in moderate-income geographies.

To analyze the borrower characteristics of HMDA related loans, the proportion of originations to LMI and non-LMI borrowers was compared with the proportion of LMI and non-LMI families in the assessment area. Income estimates from the FFIEC were used to categorize borrower income. FFIEC-adjusted median family income figures for 2016 to 2021 were used to categorize borrower income levels for 2016-2021 loans respectively. D&B data for 2021 was used for demographic information relating to the proportion of businesses with gross annual revenues ("GAR") of less than or equal to \$1 million. The size of the small business loans was also used as a proxy to identify lending to smaller businesses.

Adirondack's HMDA and small business lending performance was also compared to the respective year's performance of the aggregate of all lenders in the assessment area subject to HMDA or CRA small business loan reporting. Peer data was used for the loan-to-deposit analysis. Local peer banks were selected based on the amount of deposits and number of branches in order to choose banks similarly sized to Adirondack within their assessment areas. Adirondack's loan-to-deposit ratio was also compared to its national peer group. Adirondack's performance in making community development loans and qualified investments was also compared with peer banks in Adirondack's assessment areas.

Community Contacts

Four community representatives were contacted in connection with this examination in order to understand the community credit needs in the assessment area. Examiners conducted interviews with representatives from organizations that provided affordable housing and supported economic development. The community contacts stated that the primary community development needs included further access to affordable housing, workforce development focused on skilled workers, and access to free or low-cost financing for new businesses.

DESCRIPTION OF INSTITUTION

Adirondack Bank, headquartered in Utica, NY, is a full-service commercial bank with 19 branches in northern and central New York State. In August 2019, the bank opened a branch in Lake Placid, Essex County, NY located in the Non-Metropolitan (Multi-County) assessment area. The bank is a wholly owned subsidiary of Adirondack Bancorp Inc., a bank holding company. The bank offers a variety of credit products to consumers and businesses. Consumer products include residential mortgages (fixed and adjustable rate), automobile/recreational vehicle/watercraft loans, credit cards, home equity loans and lines of credit, and unsecured personal loans. Commercial products include commercial mortgages, term loans, lines of credit, construction loans, business credit cards, letters of credit, and loans to small businesses.

Adirondack operates in a competitive market with branches of numerous local, regional, and national banks operating in the bank’s assessment areas. Local competitors include the Bank of Utica and NBT Bank N.A. Based on deposits reported to the Federal Deposit Insurance Corporation (“FDIC”) on June 30, 2022, Adirondack had the third largest deposit market share (14.1%) in the MSA 46540 (Utica-Rome, NY), the assessment area where the bank conducted the majority of its business.

Based on the June 30, 2022, FFIEC Consolidated Report of Condition and Income ("Call Report"), Adirondack had total assets of \$990.6 million, total loans and leases of \$544.9 million, and total domestic deposits of \$881.2 million. Adirondack’s loan portfolio by dollar volume consisted of a mix of residential real estate and commercial loans as summarized in the following table:

Loan Type	\$(000s)	Percent of Total Loans & Leases
1-4 Residential Real Estate Secured	215,601	39.6%
Multifamily Dwelling	24,605	4.5%
Construction	18,774	3.4%
HELOCs	34,152	6.3%
Loans to Individuals	7,635	1.4%
Commercial & Industrial	114,545	21.0%
Nonfarm Nonresidential Secured	129,653	23.8%
Other	0	0.0%
Total	544,965	100.0%

Source: FFIEC Consolidated Report of Condition and Income June 30, 2022

Based on the June 30, 2022, Uniform Bank Performance Report ("UBPR"), Adirondack’s deposit portfolio by dollar volume was comprised of other savings deposits, time deposits, and money market deposit accounts as summarized in the following table:

Deposit Type	\$(000s)	Percent of Total Deposits
Demand Deposits	84,288	9.6%
Now & ATS Accounts	20,051	2.3%
Money Market Deposit Accounts	39,644	4.5%
Other Savings Deposits	663,546	75.3%
Time Deposits at or below Insurance Limit	26,150	3.0%
Time Deposits above Insurance Limit	37,568	4.3%
Brokered Deposits	9,975	1.1%
Total	881,222	100.0%

Source: Uniform Bank Performance Report as of June 30, 2022

Previous Public Evaluation

Adirondack’s previous CRA evaluation was conducted as of March 6, 2017, using the FFIEC Interagency CRA Examination Procedures for Intermediate Small Institutions. The prior evaluation resulted in an overall rating of Satisfactory. There were no financial or legal factors to prevent Adirondack from fulfilling its responsibility under CRA.

DESCRIPTION OF ASSESSMENT AREAS

Adirondack maintained four assessment areas located in upstate New York. The assessment areas consisted of the following:

Full Scope Assessment Areas:

Adirondack's first assessment area is located in Metropolitan Statistical Area ("MSA") 46540 (Utica-Rome, NY). The bank's MSA 46540 (Utica-Rome, NY) assessment area did not change since the previous CRA evaluation and was comprised of the entirety of Herkimer and Oneida Counties. According to the 2011-2015 American Community Survey ("ACS"), this assessment area contained 93 census tracts, of which 14 were low-income, 10 were moderate-income, 45 were middle-income, 18 were upper-income, and 6 were designated as unknown-income census tracts. In 2017, with the adoption of the 2011-2015 American Community Survey ("ACS"), MSA 46540 (Utica-Rome, NY) census tract 9400.00 changed to 0248.00 and census tract 9401.00 to 0247.00; census tract 9402.00 formed a portion of tract 0249.00; part of census tract 0230.00 formed a portion of 0249.00; these updates did not result in any geographic changes.

Adirondack's second assessment area is located in a Non-Metropolitan Area and consisted of portions of Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties. However, none of the counties were delineated by the bank in their entirety. The bank's Non-Metropolitan assessment area did not change since the previous CRA evaluation. The combined partial assessment area consisted of 40 census tracts, of which 1 was low-income, 5 were moderate-income, 25 were middle-income, 8 were upper-income, and 1 was designated as an unknown-income census tract. Hamilton County contained three distressed/underserved middle-income tracts (tract codes 9503.00, 9504.00, and 9505.00), tracts 9503.00 and 9505.00 were included in the bank's assessment area.

Limited Scope Assessment Areas:

Adirondack's third assessment area is located in MSA 45060 (Syracuse, NY). From 2016 through 2021, the bank's MSA 45060 (Syracuse NY) assessment area consisted of census tracts from portions of Madison County. The partial assessment area consisted of 9 census tracts, of which none were low-income, 2 were moderate-income, 6 were middle-income, and 1 was an upper-income census tract.

The delineation of the bank's 45060 (Syracuse, NY) assessment area was changed on January 1, 2016, as the bank removed Onondaga County. As such, the bank's assessment area contained only the partially delineated Madison County and excluded both Onondaga and Oswego Counties. Per the adoption of the 2011-2015 American Community Survey ("ACS") as a basis for the FFIEC Census File, MSA 46540 (Syracuse, NY) census tracts 9401.01 through 9407.00 were renamed 301.01 through 304.03, and 306.00.

Adirondack's fourth assessment area is located in a Non-Metropolitan area (Lewis County, NY) and consisted of census tracts from portions of Lewis County. The bank's Non-Metropolitan assessment area did not change since the previous CRA evaluation. The partial assessment area consisted of 3 census tracts, of which none were low-income, 1 was moderate-income, 2 were middle-income, and none were upper-income census tracts.

Adirondack's assessment areas were in compliance with the requirements of Section 228.41 of Regulation BB and did not arbitrarily exclude LMI geographies. A map illustrating the bank's assessment areas is in Appendix B.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Adirondack Bank's record of meeting the credit needs of its assessment area through their lending performance is rated Satisfactory. Adirondack's loan-to-deposit ratio was reasonable given the bank's size, financial condition and assessment area credit needs, and a substantial majority of its loans were originated within its assessment areas. The overall distribution of loans to borrowers reflected a reasonable penetration among individuals of different income levels and businesses of different sizes. The geographic distribution of loans reflected reasonable dispersion throughout the bank's assessment areas. Adirondack received no CRA-related complaints since the previous evaluation.

Adirondack participated in the SBA Paycheck Protection Program and originated 1,384 PPP loans totaling \$119,011,376. PPP loans provided a direct benefit to small businesses adversely affected by the COVID-19 pandemic and is considered particularly responsive to acute credit needs during that time. Additionally, the substantial majority of Adirondack's PPP loans were made in amounts of under \$1 million. Bank participation in this lending program met the credit needs to particularly small businesses, where 1,121 or 80.9% of PPP loans were loans under \$100,000, and 1,343, or 97.0%, were to employers with fewer than 50 employees. In addition, in accordance with CA Letter 21-5, PPP loans in amounts greater than \$1 million may be considered as community development loans if they also have a primary purpose of community development as defined under the CRA. Adirondack made nine PPP loans for a total of \$15.2 million, which qualified as community development loans.

Loan-to-Deposit Ratio

Adirondack's loan-to-deposit ("LTD") ratio was reasonable given the bank's size, financial condition, and the opportunities and the credit needs of its assessment area. Adirondack's average

LTD ratio for the 23-quarters from January 1, 2017 to September 30, 2022 was 68.3%, which is comparable to the previous examination’s 16-quarter average of 71.0%, indicating consistent willingness to lend and meet the credit needs of the assessment area. The bank’s average LTD ratio over the evaluation period was above the average of 65.5% for four similarly situated banks headquartered in upstate New York with branches in Adirondack’s assessment areas.

Lending in Assessment Areas

2016 through 2017

Adirondack made a substantial majority of its HMDA related loans, 97.1% by number and 94.3% by dollar amount, within its assessment areas from January 1, 2016, through December 31, 2017. The subsequent table provides additional details.

Lending Inside and Outside the Assessment Area January 1, 2016 – December 31, 2017								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	386	96.5	\$12,994	94	14	3.5	\$836	6
Home Purchase	445	98.9	\$68,656	98	5	1.1	\$1,426	2
Multi-Family Housing	7	87.5	\$935	30.6	1	12.5	\$2,121	69.4
Refinancing	233	95.1	\$30,223	92.7	12	4.9	\$2,380	7.3
Total HMDA related	1,071	97.1	\$112,808	94.3	32	2.9	\$6,763	5.7

2018 through 2021

The bank’s HMDA lending activities from January 1, 2018 through December 31, 2021 were located primarily within its assessment areas. During this period, the bank made 96.3% by number and 93.7% by dollar amount, in its assessment areas. In 2021, Adirondack made 86.5% of its small business loans by number and 67.4% by dollar volume within its respective AAs, which was considered as a representative sample of Adirondack’s overall small business activity. The bank’s origination of HMDA and small business loans within its assessment areas over the same period are shown in the subsequent table.

Lending Inside and Outside the Assessment Area January 1, 2018 – December 31, 2021								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	164	97	\$9,815	96.4	5	3	\$368	3.6
Home Purchase	642	96.1	\$111,796	94.3	26	3.9	\$6,699	5.7
Multi-Family Housing	17	77.3	\$6,380	72.5	5	22.7	\$2,420	27.5
Refinancing	701	96.8	\$106,192	94.3	23	3.2	\$6,362	5.7
Total HMDA related	1,524	96.3	\$234,183	93.7	59	3.7	\$15,849	6.3
Total Small Bus. related	90	86.5	\$25,259	67.4	14	13.5	\$12,240	32.6
TOTAL LOANS	1,614	95.7	\$259,442	90.2	73	4.3	\$28,089	9.8

Lending to Borrowers of Different Income and to Businesses of Different Sizes

Adirondack’s overall lending penetration among borrowers of different income levels (including LMI individuals) and businesses of different sizes was reasonable based on the bank’s performance in both the MSA 46540 (Utica-Rome, NY) and the Non-Metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). The proportion of originations to LMI borrowers was considered reasonable relative to the market aggregate and the percentage of LMI families for HMDA-related lending.

Geographic Distribution of Loans

Adirondack’s overall geographic distribution of loans was reasonable based on reasonable dispersion in the MSA 46540 (Utica-Rome, NY) Assessment Area and the Non-Metropolitan Assessment Area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY).

Response to Complaints

Adirondack received no complaints relating to its CRA performance. Since the previous evaluation, there were no CRA-related complaints filed with the Federal Reserve Bank of New York.

COMMUNITY DEVELOPMENT TEST

Adirondack’s performance under the community development test was Outstanding. Adirondack demonstrated excellent responsiveness to community development needs of its assessment areas through community development loans, qualified investments, and community development services as appropriate, considering the bank’s capacity and the need and availability of such opportunities in the bank’s assessment areas.

During the evaluation period, Adirondack’s community development loans and qualified investments totaled \$59.0 million, comprised of approximately \$56.3 million in community development loans and \$2.7 million in qualified investments. When compared to five other institutions operating within the assessment area, Adirondack’s annualized community development loans ranked 1st out of 6 peer banks based on Tier 1 Capital, 1st out of 6 peer banks based average assets; and 3rd out of 6 peer banks based on deposits. When compared to five other institutions operating within the assessment area, Adirondack’s annualized qualified investments ranked 2nd out of 6 peer banks based on Tier 1 Capital, 2nd out of 6 peer banks based on average assets, and 5th out of 6 based on deposits.

Substantially all of Adirondack’s community development loans and qualified investments were made within the bank’s assessment areas. Charitable donations to community development organizations totaled 223 donations for \$659,226. The bank’s community development activity also considered the bank’s Broader Statewide and Regional Area activity, consisting of 6 loans for \$747,000 which included 5 loans for \$620,000 in the MSA 46540 (Utica-Rome, NY) and Non-Metropolitan (Multi-County) assessment areas.

Summary of Community Development Loans and Qualified Investments						
January 1, 2017 to June 30, 2022						
Geography or Assessment Area	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
MSA 46540 (Utica-Rome, NY) AA	55,369	83	2,660	15	58,029	98
Non-Metropolitan (Multi-County) AA	190	2	0	0	190	2
MSA 45060 (Syracuse, NY) AA (Limited Scope)	0	0	0	0	0	0
Non-Metropolitan (Lewis County) AA (Limited Scope)	0	0	0	0	0	0
Broader Statewide/Regional Area	747	6	0	0	747	6
Total	56,306	91	2,660	15	58,966	106
<i>Lending activity includes new loans and investments made during the evaluation period, as well as investments with existing balances from the prior evaluation period that were outstanding as of 6/30/2022.</i>						
<i>Investment activity does not include charitable donations which are assessed separately.</i>						

Adirondack’s community development lending and qualified investments were responsive to community needs. In terms of the dollar amount, community services represented the majority of total activity at 44.8%, revitalization and stabilization represented 37.9%, economic development represented 12.5% and affordable housing represented 4.8% of overall activity. Community contacts identified community services and affordable housing as critical needs throughout Adirondack’s assessment areas. The subsequent chart details the Bank’s total community development loans and qualified investments.

Summary of Community Development Loans and Qualified Investments By Primary Purpose Designation January 1, 2017 to June 30, 2022						
Designation	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
Affordable Housing	2,828	15	0	0	2,828	15
Community Services	25,970	40	455	3	26,425	43
Economic Development	7,394	21	0	0	7,394	21
Revitalize and Stabilize	20,114	15	2,205	12	22,319	27
Total	56,306	91	2,660	15	58,966	106
<i>Lending activity includes new loans and investments made during the evaluation period, as well as investments with existing balances from the prior evaluation period that were outstanding as of 6/30/2022. Investment activity does not include charitable donations which are assessed separately.</i>						

In addition, in accordance with CA Letter 21-5, PPP loans in amounts greater than \$1 million may be considered as community development loans if they also have a primary purpose of community development as defined under the CRA. Adirondack made nine PPP loans for a total of \$15.2 million were included for consideration as qualified community development loans. This lending activity was considered particularly responsive with the acute credit need that many small businesses experienced throughout the pandemic.

Adirondack Bank employees also provided 93 community development services. A majority of the total number of service hours were dedicated to organizations with a community service or an economic development focus. Benefitting from these services were organizations that received financial planning or resource allocation services, as well as programs that target low- and moderate-income individuals throughout the bank’s assessment areas. Bank employees served as board members or committee members for several of these organizations.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Adirondack was in compliance with the substantive provisions or the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet the community credit needs of the assessment area was identified.

METROPOLITAN AREA

MSA 46540 (UTICA-ROME, NY)

FULL REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MSA 46540 (UTICA-ROME, NY)

Adirondack's banking activities within its assessment areas were primarily conducted in MSA 46540 (Utica-Rome, NY). As of December 31, 2021, Adirondack operated 14 of its 19 branches (73.6%) in this MSA. These branches generated \$781.0 million in deposits, which accounted for 88.6% of the bank's total branch deposits as of June 30, 2021. Of the bank's 2,595 HMDA related loans originated in the assessment areas during the evaluation period, 89.3% (or 1,912 loans) were originated in this assessment area. Of the sample of 90 small business loans originated in the assessment areas, 92.2% were originated in the MSA 46540 (Utica-Rome, NY) assessment area.

Adirondack's market area is highly competitive with branches of local and regional banks operating in the assessment area. The Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report dated June 30, 2022, ranks Adirondack 3rd among 10 FDIC-insured institutions operating in the assessment area. The bank held a 14.1% market share, compared to the market leader Bank of Utica (Utica, NY) which holds 21.3% of the assessment area's deposits. The bank's primary competitors for lending and deposits within the assessment area include Bank of Utica, M&T Bank, and NBT Bank.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe Adirondack's assessment areas and to evaluate the context in which the bank operates. The information was obtained from publicly available sources, including the 2015 ACS, U.S. Department of Labor ("DOL"), Dun and Bradstreet ("D&B"), Federal Financial Institutions Examination Council ("FFIEC"), and U.S. Department of Housing and Urban Development ("HUD"). The current review period occurred during the 2015 ACS; therefore, all data below is applicable to each year of the review period unless specifically stated otherwise.

Demographic Characteristics

The MSA 46540 (Utica-Rome, NY) assessment area included Herkimer and Oneida Counties. The assessment area was comprised of the entire MSA. According to the 2015 ACS, the population of the assessment area was 297,592. The assessment area consisted of 93 census tracts, of which 14 or 15.1% were low-income, 10 or 10.8% were moderate-income, 45 or 48.4% were middle-income, 18 or 19.4% were upper-income, and 6 or 6.5% were of unknown-income. Based on the 2010 and 2015 ACS Data, the MSA 46540 experienced minor population loss compared to the state of New York, whose population increased.

MSA 46540 (Utica-Rome, NY) - Population Change			
Area	2010 Population	2015 Population	Percent Change
Assessment Area	299,397	297,592	-0.60%
Herkimer County, NY	64,519	64,034	-0.75%
Oneida County, NY	234,878	233,558	-0.56%
New York State	19,378,102	19,673,174	1.52%
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau American Community Survey</i>			

Income Characteristics

Based on the 2015 ACS data, the MSA 46540 (Utica-Rome, NY) assessment area had 73,125 families, of which 22.0% were low-income (11.9% of which were below the poverty level), 16.9% were moderate-income, 21.5% were middle-income, and 39.6% were upper-income.

The FFIEC median family incomes for the counties comprising the MSA as of the 2015 ACS were as follows:

MSA 46540 (Utica-Rome, NY)- Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$61,852	\$61,239	-0.99%
Herkimer County, NY	\$58,028	\$58,822	1.37%
Oneida County, NY	\$63,178	\$61,842	-2.11%
New York State	\$73,401	\$71,913	-2.03%
<i>Source: 2006 - 2010 U.S. Census Bureau American Community Survey; 2011 - 2015 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

Housing Characteristics

Based on the 2015 ACS data, the MSA 46540 (Utica-Rome, NY) assessment area had 137,351 housing units, of which 57.0% were owner-occupied, 28.2% were rental, and 14.8% were vacant. Of the total housing units, 11.7% were located in low-income tracts, 11.3% in moderate-income tracts, 53.0% in middle-income tracts, 23.9% in upper-income tracts, and none in unknown-income tracts. In low-income census tracts, 24.4% of housing units were owner-occupied, 55.3% were rental units, and 20.2% were vacant. In moderate-income census tracts, 36.2% of housing units were owner-occupied, 50.9% were rental units, and 12.9% were vacant.

The median age of housing stock in the assessment area was 61 years old, with 43.6% of the stock built before 1950. According to the 2015 ACS, the median housing value in the assessment area was \$109,882 with an affordability ratio of 43.4. The median gross rent in the assessment area was \$691 per month.

MSA 46540 (Utica-Rome, NY) – Housing Affordability			
Geographic Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$109,882	43.41	\$691
Herkimer County, NY	\$96,100	48.11	\$623
Oneida County, NY	\$114,000	42.32	\$706
New York State	\$283,400	20.91	\$1,132
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey</i>			

Housing Cost Burden

The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0% or more of their income on housing costs. According to HUD's Comprehensive Housing Affordability Strategy data, within the assessment area, 41.8% of all rental households had rental costs that exceeded 30% of their incomes, 73.0% of low-income rental households had rental costs that exceeded 30% of their income, and 37.0% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within the assessment area, 18.0% of homeowners had housing costs that exceeded 30% of their incomes, 64.5% of low-income homeowners had housing costs that exceeded 30% of their income, and 33.4% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table for more details.

MSA 46540 (Utica-Rome, NY) - Housing Cost Burden						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	73.0%	37.0%	41.8%	64.5%	33.4%	18.0%
Herkimer County, NY	63.9%	31.6%	33.7%	59.2%	29.1%	18.0%
Oneida County, NY	75.0%	38.1%	43.6%	66.5%	34.9%	18.0%
New York State	77.0%	48.6%	48.0%	73.8%	46.0%	27.4%
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy</i>						

Labor, Employment and Economic Characteristics

According to D&B data, there were 9,356 businesses operating in the assessment area in 2021, of which 11.9% were located in low-income census tracts and 13.9% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.5% were small businesses with a GAR of \$1 million or less, of which 11.3% were located in low-income geographies and 13.8% were located in moderate-income geographies.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 5.1% in 2017, declined to 4.5% in 2018, declined to 4.2% in 2019, increased to 7.8% in 2020, and declined to 5.2% in 2021. The state of New York had an unemployment rate of 4.6% in 2017,

declined to 4.1% in 2018, declined to 3.8% in 2019, increased to 9.9% in 2020, and declined to 6.9% in 2021. Declines in 2020 were largely related to the COVID-19 pandemic.

MSA 46540 (Utica-Rome, NY)- Unemployment Rates					
Area	2017	2018	2019	2020	2021
Assessment Area	5.1%	4.5%	4.2%	7.8%	5.2%
Herkimer County, NY	5.7%	4.9%	4.7%	7.9%	5.8%
Oneida County, NY	5.0%	4.4%	4.1%	7.8%	5.1%
State of New York	4.6%	4.1%	3.8%	9.9%	6.9%

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

The subsequent table provides a summary of the Assessment Area Demographics for MSA 46540 (Utica-Rome, NY).

MSA 46540 (Utica-Rome, NY) Assessment Area 2021 Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	14	15.1	7,400	10.1	3,153	42.6	16,062	22
Moderate-income	10	10.8	6,587	9	1,295	19.7	12,355	16.9
Middle-income	45	48.4	40,747	55.7	3,705	9.1	15,719	21.5
Upper-income	18	19.4	18,381	25.1	550	3	28,989	39.6
Unknown-income	6	6.5	10	0	0	0	0	0
Total Assessment Area	93	100.0	73,125	100.0	8,703	11.9	73,125	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	16,021	3,917	5	24.4	8,864	55.3	3,240	20.2
Moderate-income	15,558	5,630	7.2	36.2	7,924	50.9	2,004	12.9
Middle-income	72,854	46,964	60	64.5	16,556	22.7	9,334	12.8
Upper-income	32,859	21,710	27.8	66.1	5,387	16.4	5,762	17.5
Unknown-income	59	10	0	16.9	12	20.3	37	62.7
Total Assessment Area	137,351	78,231	100.0	57.0	38,743	28.2	20,377	14.8

	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,112	11.9	946	11.3	153	18.6	13	8.3
Moderate-income	1,303	13.9	1,158	13.8	130	15.8	15	9.6
Middle-income	4,263	45.6	3,845	45.9	328	39.8	90	57.7
Upper-income	2,553	27.3	2,341	27.9	176	21.4	36	23.1
Unknown-income	125	1.3	86	1	37	4.5	2	1.3
Total Assessment Area	9,356	100.0	8,376	100.0	824	100.0	156	100.0
	Percentage of Total Businesses:			89.5		8.8		1.7
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	4	0.9	4	0.9	0	0	0	0
Moderate-income	4	0.9	4	0.9	0	0	0	0
Middle-income	343	78.9	337	79.1	5	71.4	1	50
Upper-income	84	19.3	81	19	2	28.6	1	50
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	435	100.0	426	100.0	7	100.0	2	100.0
	Percentage of Total Farms:			97.9		1.6		.5

Community Contacts

Two community representatives were contacted to provide information regarding local economic and demographic conditions. The community contacts provided information on affordable housing, community services, and economic development needs within the assessment area.

Both community contacts stressed the need for increased affordable housing options. The community contacts noted that, within the assessment area, the supply of owner-occupied and rental affordable housing stock is significantly lower than the demand. The community contacts also mentioned that affordable housing is also concentrated within urban areas of Oneida and Herkimer Counties. A community contact stated that in smaller towns and rural areas, there is an even greater shortage of affordable housing. The community contact described barriers to affordable housing in the region include cost and a lack of available land. The community contacts

observed that several redevelopment projects have been constructed in the city of Utica, but these serve as luxury lofts and are not affordable to the majority of city residents.

A community contact stated that the provision of community services, such as childcare, mental health, and domestic violence services, and access to transportation were critical community development needs for low- to moderate-income individuals. The community contact highlighted that these types of services were in demand prior to the COVID-19 pandemic, which coupled with inflationary pressures, exacerbated the levels of inequality and need within the assessment area.

In terms of economic development, community contacts stated that increased wages to combat inflation and workforce development is needed within the assessment area. The community contacts mentioned that businesses in the assessment area need skilled workers, and while warehouses and manufacturing provide well-paying jobs, a lack of ‘high-tech’ manufacturing jobs and a lack of housing availability has contributed to the assessment area’s population loss and difficulty attracting workers.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MSA 46540 (UTICA-ROME, NY)

LENDING TEST

Adirondack Bank’s record of meeting the credit needs of its assessment area through its lending performance was satisfactory. The geographic distribution of lending and the penetration among individuals of different income levels and businesses of different sizes within MSA 46540 (Utica-Rome, NY) was considered reasonable. The greatest weight based on number and volume was given to HMDA lending followed by small business lending. The analysis placed the greatest weight on the Utica-Rome, NY MSA assessment area as the bank made the majority of its loans and deposits within this AA (88.6% of deposits, and 89.4% of HMDA-reportable loans). The bank also maintains 14 of its 19 branches in the Utica-Rome AA. The bank’s lending performance considered performance context factors, some of which are further described in the geographic and borrower distribution analysis. Both community and bank representatives noted barriers to housing, and affordable housing, within the assessment area.

In addition, Adirondack’s lending performance was compared to the 2016 through 2021 aggregate of all lenders required to report HMDA and small business data within the assessment area. See the Aggregate Comparison Loan Distribution tables in CRA Appendix A for details on Adirondack’s 2016 through 2021 loan distribution by geography, borrower income and business revenue size.

Geographic Distribution of Loans

Adirondack’s overall geographic distribution of HMDA-related and small business loans reflects reasonable dispersion throughout the assessment area, including LMI census tracts. The bank’s rating for the geographic distribution of HMDA-related loans in the assessment area was driven

by its home refinance and home improvement loans, which performed more favorably than home purchase loans when compared to the aggregate and percentage of housing located in low- to moderate-income census tracts. The bank's home improvement lending demonstrated the strongest performance for lending in low- and moderate-income census tracts. During the evaluation period however, both the bank's home purchase and home refinance lending was generally below the performance of aggregate lenders and the percentage of housing. For small business lending, the bank's performance exceeded both the percentage of businesses and the aggregate lender's performance in low-income census tracts, while the bank's performance was below both these in moderate-income census tracts.

Analysis of Lending Gaps

As shown in the table on the subsequent page, during the evaluation period Adirondack made HMDA-related and small business loans in a majority of the census tracts within the MSA 46540 (Utica-Rome, NY) assessment area.

In 2016, Adirondack Bank extended loans in 91.4% of the total tracts in the assessment area. Overall penetration decreased in 2017 and 2018 to 86.1% and 83.9% of all tracts and increased to 86.1% in 2019. In 2020, overall penetration decreased to 79.6%, but in 2021 increased to 89.3%. In addition, there were some occurrences of low penetration during the evaluation period. Throughout the review period Adirondack had higher percentages of lending penetration in middle- and upper-income census tracts which compose 68.8% of the assessment area.

Opportunities to make HMDA-related loans in low-income census tracts were limited. According to the 2021 FFIEC Census Data, of the 16,021 housing units in low-income census tracts, 24.4% were owner-occupied, 55.3% were rental units, and 20.2% were vacant.

Lending Gap Analysis - MSA 46540 (Utica-Rome, NY)			
January 1, 2016 - December 31, 2021			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
2016			
Low	8	3	63%
Moderate	15	1	93%
Middle	45	3	93%
Upper	19	1	95%
Income Unknown	6	6	0%
2017			
Low	14	7	50%
Moderate	10	4	60%
Middle	45	2	96%
Upper	18	0	100%
Income Unknown	6	6	0%
2018			
Low	14	7	50%
Moderate	10	3	70%
Middle	45	5	89%
Upper	18	0	100%
Income Unknown	6	6	0%
2019			
Low	14	5	64%
Moderate	10	2	80%
Middle	45	4	91%
Upper	18	2	89%
Income Unknown	6	6	0%
2020			
Low	14	9	36%
Moderate	10	3	70%
Middle	45	6	87%
Upper	18	1	94%
Income Unknown	6	6	0%
2021			
Low	14	4	71%
Moderate	10	3	70%
Middle	45	2	96%
Upper	18	1	94%
Income Unknown	6	4	33%

Home Purchase Loans

Adirondack's home purchase lending performance to low- and moderate-income census tracts was poor. Even though the bank's lending performance for home purchase loans improved slightly year over year from 2016 to 2021, the bank's originations in low- and moderate-income census tracts for the review period remained below the percentage of owner-occupied units and aggregate lending performance in most years.

In 2021, the bank made 4.4% of home purchase loans by number and 1.6% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was comparable with the assessment area demographic of 5.0% of owner-occupied housing units located in low-income census tracts and comparable to the aggregate lending, which made 5.7% by number and 3.7% by dollar in low-income census tracts. Adirondack's lending performance in low-income census tracts in 2020 was similar to that of 2021, with origination percentages by number below the percentage of owner-occupied units and the aggregate lender originations by number. However, the bank's lending performance for home purchase loans from 2016 to 2019 was significantly below both the assessment area demographic percentage of owner-occupied units and the aggregate lender originations by number. For home purchase loans in low-income census tracts the bank made four loans in 2019, three loans in 2018, two loans in 2017, and no loans in 2016.

In 2021, the bank made 7.0% of home purchase loans by number and 3.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was comparable to the 7.2% of owner-occupied housing units located in moderate-income census tracts and was comparable to the assessment area demographic of, which made 8.9% by number and 6.1% by dollar of home purchase loans in moderate-income census tracts. While Adirondack's lending performance in moderate-income census tracts from 2016 to 2020 was similar to 2021, the percentage of its originations below the assessment area demographic of owner-occupied units and aggregate lending originations by number, its performance was significantly below the aggregate lending in 2016 and 2019.

Home Refinance Loans

Adirondack's home refinance lending performance to low- and moderate-income census tracts was reasonable. In most years, the bank's refinance activity was comparable to comparators.

The bank's home refinance lending performance in low-income census tracts was below both the assessment area demographic percentage of owner-occupied units and the aggregate lending originations by number for all years except 2018 and 2019, when the bank outperformed the aggregate lending. In moderate-income census tracts, the bank's lending performance was below the assessment area demographic percentage of owner-occupied units and the aggregate lending originations by number except for 2019 and 2020 where the bank outperformed the aggregate.

In 2021, the bank made 1.0% by number and 0.3% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the assessment area demographic of 5.0% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate lending, which made

2.5% by number and 1.5% by dollar of refinance loans in low-income census tracts. Adirondack's lending performance in low-income census tracts in 2020 was comparable to that of 2021, with origination percentages of 1.1% by number and 0.4% by dollar being significantly below the assessment area demographic of percentage of owner-occupied units of 5.0% and the aggregate lending by number of 1.6% and 0.9 by dollar. In 2019, the bank made the most home refinance loans in the review period in low-income census tracts, at 7.6% by number and 3.8% by dollar which exceeded both the percentage of owner-occupied housing units and aggregate lending by number, 5.0% and 4.0%, respectively. The bank's 2018 originations of home refinance loans, 3.3% by number and 1.4% by dollar, was below the assessment area demographic of 5.0% of owner-occupied units but exceeded the aggregate lending of 2.9% by amount and was comparable by dollar at 1.5%. The bank's 2017 home refinance lending performance for low-income census tracts was comparable to 2020 and 2021, and no refinance loans were made in 2016.

In 2021, the bank made 3.0% by number and 1.4% by dollar of refinance loans in moderate-income census tracts. Adirondack Bank's refinance lending performance in moderate-income census tracts was significantly below the assessment area demographic of 7.2% of owner-occupied housing units located in moderate-income census tracts and below the aggregate lending, which made 5.3% by number and 3.4% by dollar of refinance loans in moderate-income census tracts. In 2019 and 2020 the bank's originations of refinance loans by number and dollar in moderate-income census tracts, 8.5% and 7.3%, and 5.6% and 2.9% respectively, exceeded the aggregate lending of 5.6% and 3.9%, and 4.7% and 2.9%, respectively. The bank's 2016, 2017 and 2018 originations of home refinance loans in moderate-income census tracts were below both the assessment area demographic of the percentage of owner-occupied units and the aggregate lending by number.

Home Improvement Loans

Adirondack's home improvement lending performance to low- and moderate-income census tracts was reasonable. For four of the six years in the review period, the bank's home improvement lending in low-income census tracts was comparable to, or exceeded, the percentage of owner-occupied units and the aggregate lending. In moderate-income census tracts for 2016 through 2019, the bank's home improvement lending was comparable to the percentage of loans made by the aggregate lending, by number.

In 2021, the bank made 5.6% by number and 5.7% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts exceeded the assessment area demographic of 5.0% of owner-occupied housing units located in low-income census tracts and was significantly above the aggregate lending, which made 2.4% by number and 1.6% by dollar of home improvement loans in low-income census tracts. In 2020, the bank did not make any home improvement loans in low-income census tracts, which resulted in its performance being significantly below the percentage of owner-occupied units and the aggregate lending. In 2019, the bank's home improvement lending performance by number, 4.5%, in low-income census tracts was comparable to the assessment area demographic of the percentage of owner-occupied units and the aggregate lending of 5.0% and 4.7% respectively. However, the bank's 2019 home improvement originations by dollar, 1.7%, were below the aggregate lending of 3.2%. In 2018, the bank's home improvement lending performance by number and dollar, 7.0%

and 5.5%, in low-income census tracts exceeded the 5.0% of owner-occupied units and exceeded the 3.6% by number and 2.8% by dollar of aggregate lending. In 2017, the bank's home improvement lending performance by number and dollar, 3.6% and 1.4%, in low-income census tracts was below both the assessment area demographic of the percentage of owner-occupied units of 5.0% and the aggregate lending by number and dollar, 5.9%, and 4.2% respectively. In 2016 the bank made 4.5% by number, of home improvement loans in low-income census tracts, which was significantly above the 2.9% of owner-occupied housing units and aggregate at 3.4% by number. The bank's 2016 home improvement lending performance by dollar of 2.4% was similar to the aggregate lending of 2.1%.

In 2021 and 2020, the bank did not make any home improvement loans in moderate-income census tracts. Adirondack Bank's home improvement lending performance in moderate-income census tracts was significantly below the assessment area demographic of 7.2% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate lending, which made 5.6% and 4.6% by number, in 2021 and 2020 respectively, and 4.1% by dollar, in both years, of home improvement loans in moderate-income census tracts. In 2019, the bank made 4.5% by number and 2.2% by dollar of home improvement loans in moderate-income census tracts, which was below the assessment area demographic of percentage of owner-occupied units, 7.2%, and similar to the aggregate lending by number and dollar, of 4.2% and 2.7%. In 2017 and 2018, the bank displayed similar lending trends to 2019, with the bank making 5.3% of its home improvement loans by number, each year, in moderate-income census tracts. Comparatively by dollar, the bank's 2017 and 2018 performance of 4.6% and 6.1%, exceeded the aggregate lending of 4.4% and 5.2%. In 2016, the bank's home improvement loans made in moderate-income census tracts was greater than other years at 9.1% by number and 9.4% by dollar, which exceeded the assessment area demographic of percentage of owner-occupied units of 7.2%, and aggregate lending by number of 8.8% and dollar of 6.5%.

Small Business Loans

The geographic distribution of small business loans reflected reasonable penetration throughout the assessment area.

In 2021, the bank made 12.0% by number and 16.9% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts exceeded the assessment area demographic of 11.9% of businesses located in low-income census tracts and the aggregate lending, which made 11.0% by number and 11.8% by dollar of small business loans in low-income census tracts.

In 2021, the bank made 8.4% by number and 30.0% by dollar of small business loans in moderate-income census tracts. Adirondack Bank's small business lending performance in moderate-income census tracts was below the assessment area demographic of 13.9% of businesses located in moderate-income census tracts and the aggregate lending, which made 11.1% by number and 14.7% by dollar of small business loans in moderate-income census tracts.

Lending to Borrowers of Different Income and to Businesses of Different Sizes

Adirondack's overall distribution of HMDA-related and small business loans in MSA 46540 (Utica-Rome, NY) reflected reasonable penetration among individuals of different income levels and businesses of different sizes. The bank's rating for the borrower distribution of HMDA-related loans in the assessment area was driven by its home refinance and home improvement loans, which performed more favorably than home purchase loans when compared to the aggregate and percentage of low- and moderate-income families in the assessment area. During the evaluation period, both the bank's home purchase and home refinance lending was generally below the performance of aggregate lenders and the percentage of low- and moderate-income families. Housing costs exceeded the income of low- and moderate-income households within the assessment area, although housing was more affordable for moderate-income households than low-income households. HUD's Comprehensive Housing Affordability Strategy data for the evaluation period showed that 64.5% of low-income homeowners and 33.4% of moderate-income homeowners had housing costs that exceeded 30% of their income.

Home Purchase Loans

Adirondack's home purchase lending performance to low- and moderate-income borrowers was poor. The bank's home purchase originations to low-income families were significantly below the percentage of low-income families in the assessment area, and below the aggregate lending performance for all six years in the review period. However, of the six years, originations to moderate-income families were comparable to the percentage of moderate-income families in the assessment area for three years, and slightly above the percentage of moderate-income families for one year. When compared to the market aggregate lending performance, the bank's home purchase lending to moderate-income families was below the aggregate lending for all six years.

In 2021, the bank made 3.5% by number and 2.0% by dollar of its home purchase loans to low-income borrowers which was significantly below the assessment area demographic of 22.0% of low-income families in the assessment area. The bank's performance was also significantly below the aggregate lending, which made 10.6% by number and 6.4% by dollar of home purchase loans to low-income borrowers. The bank's 2019 and 2020 lending performance for home purchase loans to low-income borrowers was comparable to 2021, as its loan by number and dollar were significantly below both the assessment area demographic of percentage of low-income families in the assessment area, and the aggregate lending performance. The bank's 2016 through 2018 lending performance for home purchase loans to low-income borrowers was also significantly below the assessment area demographic of percentage of families in the assessment area, and was more comparable, but still below the aggregate lending performance.

In 2021, the bank made 7.0% by number and 3.1% by dollar of its home purchase loans to moderate-income borrowers, which was significantly below the assessment area demographic of 16.9% moderate-income families in the assessment area. The bank's performance was also significantly below the aggregate lending, which made 23.2% by number and 17.9% by dollar of home purchase loans to moderate-income borrowers. The bank's home purchase lending performance by number from 2017 to 2020 was comparable to the percentage of moderate-income

families at 16.9 percent, with the bank exceeding that percentage in 2018, at 20.6%. However, by dollar amount, the bank's home purchase lending was below the percentage of moderate-income families. The bank's 2016 home purchase lending performance by number was below the 2017 to 2020 performance, at 14.7% by number and 7.7% by dollar being made to the assessment area demographic of moderate-income families. For all six years in the review period, the bank's home purchase lending by number and dollar to moderate-income families performed below the aggregate lending.

Home Refinance Loans

Adirondack's home refinance lending performance to low- and moderate-income borrowers was reasonable. The bank's refinance loans to low-and moderate-income borrowers was comparable to comparators for five of the six years.

In 2021, the bank made 4.5% by number and 1.8% by dollar of its home refinance loans to low-income borrowers which was significantly below the assessment area demographic of 22.0% of low-income families in the assessment area. The bank's performance was also below the aggregate lending, which made 6.6% by number and 3.8% by dollar of home refinance loans to low-income borrowers. The bank's home refinance lending performance for all years except 2017 was comparable to the 2021 performance, with lending being significantly below the assessment area demographic of percentage of low-income borrowers, and below the performance of the aggregate lending. In 2017 the bank made 9.2% of its home refinance loans by number and 7.3% by dollar to low-income borrowers, which was slightly above the aggregate lending at 7.9% and 5.0%, and significantly below the assessment area demographic of 22.0% of low-income families.

In 2021, the bank made 15.4% by number and 9.6% by dollar of its home refinance loans to moderate-income borrowers which was slightly below the assessment area demographic of 17.3% of moderate-income families in the assessment area. The bank's performance was also slightly below the aggregate lending, which made 17.2% by number and 12.4% by dollar of home refinance loans to moderate-income borrowers. While the bank's 2020 home refinance lending performance to moderate-income borrowers was comparable to 2021 in that performance was below the aggregate, at 11.2% by number and 6.4% by dollar, the 2016, 2017, and 2019 lending performances were comparable to or exceeded the aggregate performance by number. In 2018, the bank's home refinance lending performance to moderate-income borrowers of 14.8% by number and 9.5% by dollar was also below the aggregate lending of 17.4% and 12.9%, respectively. In 2016, 2017, and 2019 the bank's lending to moderate-income borrowers, 17.2%, 14.7%, and 21.2% by number respectively, was comparable to or exceeded the aggregate lending at 15.0%, 16.3%, and 19.0%, respectively. By dollar amount for 2016, 2017, and 2019, the bank's lending to moderate-income borrowers at 11.6%, 10.7%, and 13.5% was comparable to or below the aggregate lending of 11.2%, 12.1%, and 14.0%.

Home Improvement Loans

Adirondack's home improvement lending performance to low- and moderate-income borrowers was reasonable. The bank's performance for home improvement loan originations to low- and moderate-income families was at least comparable to or exceeded the aggregate lending for the

majority of the review period. Additionally, the bank's lending performance by number was also comparable to or exceeded the assessment area demographic of percentage of moderate-income families within the assessment area.

In 2021, the bank did not make any home improvement loans to low-income borrowers. In 2020, the bank's lending to low-income borrowers was 15.0% by number and 6.8% by dollar and exceeded the aggregate lending, at 8.9% by number and 6.4% by dollar. The bank's performance was below the assessment area demographic of 22.0% of low-income families in the assessment area. The bank's home improvement lending to low-income borrowers from 2016 to 2019 was comparable to its 2020 performance, as the bank's loans to low-income borrowers by number were below the assessment area demographic of percentage of low-income families, and comparable to or exceeded the aggregate lending. In 2016, 2017, 2018, and 2019 the bank's lending to low-income borrowers, 13.1%, 16.6%, 15.8%, and 13.6 by number respectively, was comparable to or exceeded the aggregate lending data at 9.9%, 12.6%, 9.6%, and 13.1, respectively. By dollar amount from 2016 to 2019, the bank's lending performance of 7.3%, 6.2%, 8.5%, and 11.1%, respectively, was also comparable to or exceeded the aggregate lending data of 5.2%, 6.3%, 5.8%, and 9.8%, respectively.

In 2021, the bank's lending to moderate-income borrowers was 22.2% by number and 20.5% by dollar and exceeded the aggregate lending, at 16.4% by number and 11.8% by dollar. The bank's performance exceeded the assessment area demographic of 16.9% of moderate-income families in the assessment area. The bank performance was comparable to the aggregate lending data by number in 2017 and 2020. In 2016, 2018, and 2019 the bank's home improvement lending to the assessment area demographic of moderate-income borrowers, 26.1%, 15.8%, and 20.5% by number respectively, was comparable to or exceeded the aggregate lending at 23.3%, 16.7%, 19.6%, respectively. By dollar amount from 2016 to 2018, the bank's lending to moderate-income borrowers at 13.9%, 10.3%, and 9.4%, respectively, was below the aggregate lending of 15.1%, 13.0%, and 13.4%, respectively. In 2019, the bank's lending performance by dollar of 23.9% exceeded the aggregate of 17.2%.

Small Business Loans

The borrower distribution of small business loans reflected reasonable penetration among businesses of different revenue sizes.

In 2021, the bank made 53.0% of loans by number and 40.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses exceeded the aggregate lending, at 44.8% by number and 26.1% by dollar, but was below the assessment area demographic of 89.5% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also made 48.2% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses. The bank's lending performance for loans in amounts of \$100,000 or less, was below the aggregate lenders which made 91.9% of its loans to these businesses.

Community Development Test

Adirondack’s community development performance in MSA 46540 (Utica-Rome, NY) demonstrated excellent responsiveness to the community development needs of the assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA. This evaluation considered Adirondack’s capacity and the need and availability of opportunities for community development activities in MSA 46540 (Utica-Rome, NY).

Adirondack’s community development loans and qualified investments targeting MSA 46540 (Utica-Rome, NY) totaled \$58.0 million or 98.4% of Adirondack’s overall community development loans and qualified investments. New loans and investments, by dollar amount, made during the evaluation period represented the majority of qualified assessment area community development activities. Adirondack’s community development loans and qualified investments made in this assessment area during the 66-month evaluation period increased by 41.8%, compared to the prior evaluation period of 39-months.

Adirondack also made nine PPP loans totaling \$15.2 million in MSA 46540 (Utica-Rome, NY) that examiners included for consideration as qualified community development loans. In accordance with CA Letter 21-5, PPP loans in amounts greater than \$1 million may be considered as community development loans if they also have a primary purpose of community development as defined under the CRA.

Of the bank’s total community development loans and qualified investments, 45.5%, in terms of dollar volume, targeted community service efforts. Community contacts identified affordable housing and community services as the primary assessment area needs, especially since the COVID-19 pandemic exacerbated inequalities and service needs, which were already facing resource challenges before the pandemic.

Summary of Community Development Loans and Qualified Investments MSA 46540 (Utica-Rome, NY) Assessment Area By Primary Purpose Designation January 1, 2017 to June 30, 2022						
Designation	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
Affordable Housing	2,828	15	0	0	2,828	15
Community Services	25,930	39	455	3	26,385	42
Economic Development	6,497	14	0	0	6,497	14
Revitalize and Stabilize	20,114	15	2,205	12	22,319	27
Total	55,370	83	2,660	15	58,030	98
<i>Lending activity includes new loans and investments made during the evaluation period, as well as investments with existing balances from the prior evaluation period that were outstanding as of 6/30/2022.</i>						
<i>Investment activity does not include charitable donations which are assessed separately.</i>						

Community Development Loans

Adirondack made \$55.4 million in community development loans in MSA 46540 (Utica-Rome, NY). Of this total dollar amount of community development loans, 46.8% financed community service projects, 36.3% supported the revitalization and stabilization of LMI geographies, 11.7% was for economic development, and 5.1% was for affordable housing.

Examples of Adirondack's community development loans included:

- A lead role in a participation loan totaling \$1.6 million to provide funds for the construction of a grocery store located in a low-income census tract.
- Providing funds in the amount of \$500,000 for gap financing to a non-profit in a moderate-income census tract that provided services to LMI individuals with disabilities.
- A \$205,000 loan to a non-profit for affordable housing for individuals with disabilities.
- Nine PPP loans for a total of \$15.2 million were responsive to the acute credit needs many businesses experienced throughout the pandemic.

Community Development Investments

Adirondack's qualified investments in MSA 46540 (Utica-Rome, NY) totaled \$2.7 million. In terms of dollar amount, 17.1% of the investments were dedicated to community services and 82.9% targeted revitalization and stabilization efforts in LMI geographies. All of the qualified investments represented new investments made since the prior CRA evaluation. Charitable donations to community development organizations totaled \$564,775.

Examples of qualified investments included:

- Municipal bonds totaling \$1.4 million to fund floodplain restoration projects and bridge repairs in response to disaster declarations for flooding and for revenues received from FEMA in a community that included LMI geographies.
- A \$165,700 bond to purchase an ambulance that addressed community health needs, inclusive of low- and moderate-income individuals, during the COVID-19 pandemic.
- Charitable donations totaling \$40,000 to an organization that provided mental health services to low- and moderate-income individuals.

Community Development Services

During the 66-month evaluation period, Adirondack provided 84 volunteer financial services, representing a majority of the bank's dedicated hours to community development services. Additionally, Adirondack provided three service activities that were at the broader statewide or regional area. The provision of these services included Adirondack officers, directors, and employees serving on boards or committees of non-profit organizations. The community development services for this review period increased over the prior period, where 65 events held

during the previous 39-month evaluation period. Adirondack also developed ongoing partnerships with various community development organizations in order to gain knowledge of needs of the assessment area and improve the services the bank provides.

Examples of community development services included:

- Collaborating with a home ownership organization to provide first-time homebuyer workshops and financial education.
- Presenting financial literacy workshops to schools where a majority of students are eligible for free or reduced lunch.
- Board memberships with organizations that address economic development.

**NON-METROPOLITAN ASSESSMENT AREA
(Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY)**

FULL REVIEW

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NON-METROPOLITAN
AREA (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY)**

As of December 31, 2021, Adirondack operated five of its 19 branches (26.3%) in the Non-Metropolitan assessment area. These branches generated \$100.3 million in deposits, which accounted for 11.4% of the bank's total branch deposits as of June 30, 2021. Of the bank's 2,595 HMDA related loans originated in the assessment areas during the evaluation period, 8.7% were originated in this assessment area. Of the sample of 90 small business loans originated in the assessment areas, 7.8% were originated in the Non-MSA assessment area.

Adirondack's market area is highly competitive with branches of local and regional banks operating in the assessment area. The FDIC Deposit Market Share Report, dated June 30, 2022, ranks Adirondack 7th among ten FDIC insured institutions operating in the assessment area. The bank holds a 1.7% market share, compared to the market leader NBT Bank, NA (Norwich, NY) which holds 26.7% of the assessment area's deposits. The three institutions with the highest deposit market shares hold 71.8% of the deposits within the assessment area. Primary competitors within the assessment area include NBT Bank, Community Bank, and KeyBank.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe Adirondack's assessment areas and to evaluate the context in which the bank operates. The information was obtained from publicly available sources, including the 2015 ACS, U.S. DOL, D&B, FFIEC, and HUD. The current review period occurred during the 2015 ACS; therefore, all data below is applicable to each year of the review period unless specifically stated otherwise.

Demographic Characteristics

The New York State Non-Metropolitan assessment area included portions of Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties. According to the 2015 ACS, the population of the assessment area was 140,343. The assessment area consisted of 40 census tracts, of which 1 or 2.5% were low-income, 5 or 12.5% were moderate-income, 25 or 62.5% were middle-income, 8 or 20.0% were upper-income, and 1 or 2.5% were of unknown-income. Based on the 2010 and 2015 ACS Data, all counties within the New York State Non-Metropolitan assessment area experienced minor population loss compared to the State of New York, whose population increased.

NY Non-Metropolitan - Population Change			
Area	2010 Population	2015 Population	Percent Change
Assessment Area	283,683	281,022	-0.94%
Clinton County, NY	82,128	81,685	-0.54%
Essex County, NY	39,370	38,912	-1.16%
Franklin County, NY	51,599	51,280	-0.62%
Fulton County, NY	55,531	54,606	-1.67%
Hamilton County, NY	4,836	4,760	-1.57%
Montgomery County, NY	50,219	49,779	-0.88%
Non-MSA NY	1,421,642	1,405,860	-1.11%
New York State	19,378,102	19,673,174	1.52%
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau American Community Survey</i>			

Income Characteristics

Based on the 2015 ACS data, the Non-Metropolitan assessment area had 33,851 families, of which 20.9% were low-income (11.0% of which were below the poverty level), 16.9% were moderate-income, 20.5% were middle-income, and 41.7% were upper-income.

The FFIEC median family incomes for the counties comprising the MSA as of the 2015 ACS were as follows:

NY Non-Metropolitan - Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$59,424	\$60,068	1.09%
Clinton County, NY	\$65,642	\$64,371	-1.94%
Essex County, NY	\$60,743	\$65,902	8.49%
Franklin County, NY	\$55,336	\$57,790	4.43%
Fulton County, NY	\$54,910	\$55,841	1.69%
Hamilton County, NY	\$65,240	\$60,650	-7.04%
Montgomery County, NY	\$58,233	\$55,000	-5.55%
Non-MSA NY	\$59,224	\$59,570	0.58%
New York State	\$73,401	\$71,913	-2.03%
<i>Source: 2006 - 2010 U.S. Census Bureau American Community Survey; 2011 - 2015 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

Housing Characteristics

Based on the 2015 ACS data, the assessment area had 74,883 housing units, of which 49.2% were owner-occupied, 23.6% were rental, and 27.2% were vacant. Of the total housing units, 2.0% were located in low-income tracts, 11.4% in moderate-income tracts, 62.0% in middle-income tracts, 24.5% in upper-income tracts, and 0.2% in unknown-income tracts. In low-income census tracts, 12.1% of housing units were owner-occupied, 72.5% were rental units, and 15.4% were vacant. In moderate-income census tracts, 48.5% of housing units were owner-occupied, 37.1% were rental units, and 14.3% were vacant.

The median age of housing stock in the assessment area was 61 years old, with 39.9% of the stock built before 1950. According to the 2015 ACS, the median housing value in the assessment area was \$120,252 with an affordability ratio of 39.9. The median gross rent in the assessment area was \$728 per month.

NY Non-Metropolitan – Housing Affordability			
Geographic Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$120,252	39.92	\$728
Clinton County	\$124,200	40.20	\$744
Essex County	\$145,100	36.36	\$805
Franklin County	\$101,600	47.17	\$671
Fulton County	\$108,200	43.41	\$711
Hamilton County	\$162,600	29.67	\$622
Montgomery County	\$101,600	43.07	\$702
State of New York	\$283,400	20.91	\$1,132
Non-MSA NY	\$109,604	43.00	\$692

Source: 2011 - 2015 U.S. Census Bureau American Community Survey

Housing Cost Burden

The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0% or more of their income on housing costs. According to HUD's Comprehensive Housing Affordability Strategy data, within the assessment area, 41.4% of all rental households had rental costs that exceeded 30% of their incomes, 74.4% of low-income rental households had rental costs that exceeded 30% of their income, and 34.3% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within the assessment area, 19.0% of homeowners had housing costs that exceeded 30% of their incomes, 64.5% of low-income homeowners had housing costs that exceeded 30% of their income, and 34.2% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

NY Non-Metropolitan - 2021 Housing Cost Burden						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	74.4%	34.3%	41.4%	64.5%	34.2%	19.0%
Clinton County, NY	74.5%	34.2%	38.5%	60.1%	32.8%	16.9%
Essex County, NY	73.4%	38.3%	39.9%	66.4%	37.9%	19.8%
Franklin County, NY	65.7%	28.3%	38.8%	52.5%	27.1%	16.4%
Fulton County, NY	77.3%	36.0%	42.9%	73.3%	34.8%	20.8%
Hamilton County, NY	69.1%	40.0%	30.0%	62.5%	24.1%	19.1%
Montgomery County, NY	79.5%	34.4%	48.1%	71.2%	39.4%	22.1%
Non-MSA NY	73.8%	33.3%	42.1%	63.9%	31.8%	19.0%
New York State	77.0%	48.6%	48.0%	73.8%	46.0%	27.4%

*Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy*

Labor, Employment and Economic Characteristics

According to D&B data, there were 5,370 businesses operating in the assessment area in 2021, of which 3.8% were located in low-income census tracts and 11.1% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.7% were small businesses with a GAR of \$1 million or less, of which 3.8% were located in low-income geographies and 10.9% were located in moderate-income geographies.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 5.6% in 2017, decreased to 4.9% in 2018, decreased to 4.6% in 2019, increased to 8.0% in 2020, and decreased to 5.0% in 2021. The State of New York had an unemployment rate of 4.6% in 2017, decreased to 4.1% in 2018, decreased to 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021. Declines in 2020 were largely related to the COVID-19 pandemic.

NY Non-Metropolitan - Unemployment Rates					
Area	2017	2018	2019	2020	2021
Assessment Area	5.6%	4.9%	4.6%	8.0%	5.0%
Clinton County, NY	5.2%	4.4%	4.2%	7.7%	4.6%
Essex County, NY	5.4%	4.8%	4.5%	7.9%	4.7%
Franklin County, NY	6.0%	5.1%	4.8%	7.9%	4.7%
Fulton County, NY	5.7%	5.1%	4.8%	8.3%	5.5%
Hamilton County, NY	7.3%	6.8%	5.7%	7.7%	4.4%
Montgomery County, NY	5.7%	5.1%	4.9%	8.4%	5.7%
Non-MSA New York	5.5%	4.7%	4.4%	7.8%	4.9%
Non-MSA NY	5.5%	4.7%	4.4%	7.8%	4.9%
New York State	4.6%	4.1%	3.8%	9.9%	6.9%

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

The subsequent table provides a summary of the Assessment Area Demographics for the Non-Metropolitan Assessment Area:

NY Non-Metropolitan Assessment Area 2021 Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.5	479	1.4	145	30.3	7,059	20.9
Moderate-income	5	12.5	4,481	13.2	845	18.9	5,726	16.9
Middle-income	25	62.5	21,367	63.1	2,195	10.3	6,943	20.5
Upper-income	8	20	7,508	22.2	528	7	14,123	41.7
Unknown-income	1	2.5	16	0	0	0	0	0
Total Assessment Area	40	100	33,851	100	3,713	11	33,851	100
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,485	180	0.5	12.1	1,076	72.5	229	15.4
Moderate-income	8,507	4,130	11.2	48.5	3,160	37.1	1,217	14.3
Middle-income	46,440	23,748	64.5	51.1	9,626	20.7	13,066	28.1
Upper-income	18,321	8,787	23.8	48	3,770	20.6	5,764	31.5
Unknown-income	130	0	0	0	45	34.6	85	65.4
Total Assessment Area	74,883	36,845	100	49.2	17,677	23.6	20,361	27.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	205	3.8	183	3.8	20	4.6	2	1.7
Moderate-income	595	11.1	523	10.9	60	13.8	12	10.1
Middle-income	3,225	60.1	2,884	59.9	257	58.9	84	70.6
Upper-income	1,315	24.5	1,199	24.9	95	21.8	21	17.6
Unknown-income	30	0.6	26	0.5	4	0.9	0	0
Total Assessment Area	5,370	100	4,815	100	436	100	119	100
	Percentage of Total Businesses:			89.7		8.1		2.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	32	15.2	31	15.1	1	16.7	0	0
Middle-income	158	74.9	153	74.6	5	83.3	0	0
Upper-income	20	9.5	20	9.8	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	211	100	205	100	6	100	0	0
	Percentage of Total Farms:			97.2		2.8		0

2021 FFIEC Census Data and 2021 D&B Information

Community Contacts

Two community contacts were interviewed to provide information regarding local economic and demographic conditions. The community contacts provided information on affordable housing, community services, and economic development needs within the assessment area. Primary community development needs cited by the community contacts included affordable housing, transportation services, workforce development, and gap financing for small businesses.

Both community contacts stressed the need for increased affordable housing options. The community contacts noted that within the assessment area, the supply of affordable housing stock, both owner-occupied and rentals, is significantly lower than the demand. The community contacts observed that noted barriers to affordable housing are the costs of raw materials, and a lack of existing stock and that the majority of housing, especially affordable housing within the assessment area, is owned by private landlords. The community contacts stated that the availability of housing inventory in recent years is at the lowest it has ever been. The community contacts further observed that the shortage of affordable housing is a larger concern in smaller towns throughout the rural assessment area, rather than the city of Plattsburgh. The community contacts also noted that the lack of affordable housing results in workers commuting longer distances. The community contacts mentioned that the cost of transportation cuts into wages in core industries, so even though median wages have increased, wages are not sufficient to keep up with rising costs of living and inflation.

The community contacts noted that small businesses in the assessment area have encountered workforce development challenges in hiring and employment which have recovered since the COVID-19 pandemic but have not returned to pre-pandemic levels. The community contacts discussed other challenges businesses and non-profits in the assessment area face are funding related, specific to grant funding and reimbursements, meaning that gap funding is particularly effective. Additionally, as a result of the disbursement of COVID-19 relief funds, a community contacts noted that there has been less demand for financing commercial growth.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NON-METROPOLITAN ASSESSMENT AREA (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY)

LENDING TEST

Adirondack Bank's record of meeting the credit needs of its assessment area through its lending performance was satisfactory. Lending performance in the Non-Metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) was considered reasonable based on Adirondack's performance relative to the geographic distribution of lending and the penetration among individuals of different income levels and businesses of different sizes. The evaluation was based on the number and volume of HMDA-related and small business lending.

The bank's lending performance took into account performance context factors such as the percentage of owner-occupied units, housing affordability, the bank's low number of branches and competition throughout the assessment area. Additionally, both community and bank representatives noted the rural nature of the county. As the bank maintains five branches throughout the six counties, the distance to the branches is significant. Bank representatives also noted that the housing markets and demographics throughout the assessment area vary greatly as much of the counties are made up of smaller rural towns, but the cities of Lake Placid and Plattsburgh are urban and housing needs cater to persons of higher incomes.

In addition, Adirondack's lending performance was compared to the 2016 through 2021 aggregate of all lenders required to report HMDA and small business data within the assessment area. See the Aggregate Comparison Loan Distribution tables in CRA Appendix A for details on Adirondack's 2016 through 2021 loan distribution by geography, borrower income and business revenue size.

Geographic Distribution of Loans

Adirondack's overall geographic distribution of HMDA-related and small business loans reflected poor dispersion throughout the Non-Metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). Across all years in the evaluation period, the bank's lending performance was generally below that of aggregate lenders and the percentage of housing units in low- and moderate-income census tracts. The bank's assessment area consisted of 1 low-income, 5 moderate-income, 25 middle-income, and 8 upper-income census tracts.

Opportunities to make HMDA-related loans and consumer loans in the one low-income census tracts were limited. According to the 2021 FFIEC Census Data, of the 1,485 housing units in the low-income census tract, 12.1% were owner-occupied, 72.5% were rental units, and 15.4% were vacant. Of the 36,845 owner-occupied units in the Non-metropolitan assessment area, only 0.5% were located in the low-income census tract. According to the 2021 FFIEC Census Data, approximately 1.4% of families resided in the low-income tract, and of the 479 families, 145, or 30.3%, live below the poverty level.

There were more opportunities for lending in moderate-income census tracts, although the majority of housing in these tracts consisted of rental and vacant units in such tracts. Additionally, the majority of the assessment area's housing was available in middle- and upper-income tracts, which held 86.4% of total housing units. According to the 2021 FFIEC Census Data, of the 8,507 housing units in moderate-income census tracts, 48.5% were owner-occupied, 37.1% were rental units, and 14.3% were vacant. Of the 36,845 owner-occupied units in the Non-Metropolitan assessment area, only 11.2% were located in moderate-income census tracts.

Given the above performance context, the analysis of the lending distribution throughout the Non-Metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) was based on lending performance in moderate-income census tracts.

Analysis of Lending Gaps

The bank extended loans to 40.0% of the census tracts within the assessment area in 2016, 47.5% in 2017, and 42.5% in 2018. However, in 2019 the bank's loan penetration was only 27.5%; loans were not made within the low- or moderate-income census tracts. In middle- and upper-income census tracts as the loan penetration was 32.0% and 38.0%, respectively. The bank's lending penetration improved slightly from 2019 in 2020 and 2021, to 30.0% and 37.5%, respectively, of total census tracts within the assessment area.

Penetration was weak due to the rural nature of the assessment area with only five branches located in three of the six counties comprising the assessment area. In Clinton County, where there were no branch locations, 180 owner-occupied units were located in the one low-income census tract in that county. In Fulton County, where there were also no branch locations, 2,343 owner-occupied units were located in the three moderate-income census tracts in that county. The bank extended loans for the majority of the review period in the two distressed and underserved middle-income census tracts in Hamilton County, where there also was no branch presence. Loan penetration in Clinton, Essex, and Franklin counties, where Adirondack had a branch presence, was slightly better across the review period.

Based on performance context challenges, opportunities to make loans in LMI tracts were limited. The table below details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Lending Gap Analysis - Non-MSA January 1, 2016 - December 31, 2021			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
2016			
Low	1	1	0%
Moderate	7	5	29%
Middle	22	13	41%
Upper	9	4	56%
Income Unknown	1	1	0%
2017			
Low	1	1	0%
Moderate	5	4	20%
Middle	25	13	48%
Upper	8	2	75%
Income Unknown	1	1	0%
2018			
Low	1	1	0%
Moderate	5	4	20%
Middle	25	14	44%
Upper	8	3	63%
Income Unknown	1	1	0%
2019			
Low	1	1	0%
Moderate	5	5	0%
Middle	25	17	32%
Upper	8	5	38%
Income Unknown	1	1	0%
2020			
Low	1	1	0%
Moderate	5	5	0%
Middle	25	18	28%
Upper	8	3	63%
Income Unknown	1	1	0%
2021			
Low	1	1	0%
Moderate	5	4	20%
Middle	25	15	40%
Upper	8	4	50%
Income Unknown	1	1	0%

Home Purchase Loans

Adirondack's home purchase lending performance to moderate-income census tracts was poor. The bank made no home purchase loans in moderate-income census tracts in 2016, 2017, 2019, 2020, and 2021. The bank's 2018 home purchase loans in moderate-income tracts exceeded comparators.

The bank did not make any home purchase loans in moderate-income census tracts from 2016 through 2017 and from 2019 through 2021. As such the bank's performance was significantly below the aggregate lending, and the assessment area demographic of 11.2% of owner-occupied housing units located in the five moderate-income census tracts for these years. In 2018, the bank made 16.7% of home purchase loans by number and 6.5% by dollar in moderate-income census tracts. The bank's home purchase lending performance exceeded the assessment area demographic of 11.2% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate lending, which made 8.8% by number and 5.8% by dollar of home purchase loans in moderate-income census tracts.

Home Refinance Loans

Adirondack's home refinance lending performance to moderate-income census tracts was poor. In 2021, the bank made 5.0% by number and 3.3% by dollar of refinance loans in moderate-income census tracts. Adirondack Bank's refinance lending performance in moderate-income census tracts was below the assessment area demographic of 11.2% of owner-occupied housing units located in moderate-income census tracts and below the aggregate lending which made 7.3% by number and 4.1% by dollar of refinance loans in moderate-income census tracts. The bank did not make any home refinance loans in moderate-income census tracts from 2017 through 2020. As such, the bank's performance was significantly below the aggregate lending, and the assessment area demographic of 11.2% of owner-occupied housing units located in the five moderate-income census tracts for these years. In 2016, the bank made 5.9% by number and 2.2% by dollar of refinance loans in moderate-income census tracts. Adirondack Bank's refinance lending performance in moderate-income census tracts was significantly below the assessment area demographic of 12.2% of owner-occupied housing units located in moderate-income census tracts and below the aggregate lending, which made 8.6% by number and 6.5% by dollar of refinance loans in moderate-income census tracts. Additionally, the home refinance aggregate lending by number was also less than 10% for all years of the review period, indicating a challenging lending environment.

Home Improvement Loans

Adirondack's home improvement lending performance to moderate-income census tracts was poor. The bank did not make any home improvement loans in moderate-income census tracts from 2018 through 2021. The bank's performance was significantly below the aggregate lending, and the assessment area demographic of 11.2% of owner-occupied housing units located in the five moderate-income census tracts for these years. In 2017, the bank made 10.0% by number and 2.9% by dollar of home improvement loans in moderate-income census tracts. Adirondack Bank's home improvement lending performance in moderate-income census tracts was comparable to the

assessment area demographic of 11.2% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate lending, which made 9.3% by number and 4.0% by dollar of home improvement loans in moderate-income census tracts. In 2016, the bank made 11.1% by number and 1.8% by dollar of home improvement loans in moderate-income census tracts. In 2016, Adirondack Bank's home improvement lending performance in moderate-income census tracts was comparable to the assessment area demographic of 12.2% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate lending, which made 10.6% by number and 7.2% by dollar of home improvement loans in moderate-income census tracts.

Small Business Loans

The geographic distribution of small business loans reflected poor dispersion throughout the assessment area.

In 2021, the bank did not make any small business loans in moderate-income census tracts. Adirondack Bank's small business lending performance in moderate-income census tracts was significantly below the assessment area demographic of 11.1% of businesses located in moderate-income census tracts and significantly below the aggregate lending, which made 10.8% by number and 14.3% by dollar of small business loans in moderate-income census tracts.

Lending to Borrowers of Different Income and to Businesses of Different Sizes

Adirondack's overall distribution of HMDA-related and small business loans in the Non-Metropolitan assessment area reflected reasonable penetration among individuals of different income levels and businesses of different sizes. The majority of the bank's made HMDA-related loans were to moderate-income borrowers. The bank's rating for the borrower distribution of HMDA-related loans in the assessment area was driven by its home refinance and home improvement loans, which performed more favorably than home purchase loans when compared to the aggregate and percentage of low- and moderate-income families in the assessment area. The bank's home improvement lending demonstrated the strongest performance for lending to low- and moderate-income families. Housing costs exceed the income of low- and moderate-income households within the assessment area, although housing was more affordable for moderate-income households than low-income households. HUD's Comprehensive Housing Affordability Strategy data for the evaluation period showed that 64.5% of low-income homeowners had housing costs that exceeded 30% of their income, and 34.2% of moderate-income homeowners had housing costs that exceeded 30% of their income.

Home Purchase Loans

Adirondack's home purchase lending performance to low- and moderate-income borrowers was reasonable. The bank did not make any home purchase loans to low-income borrowers from 2016 through 2018, nor from 2020 through 2021. As such, the bank's performance was significantly below the aggregate lending and the assessment area demographic of 20.9% of low-income families in the assessment area. The average of the aggregate lending of loans to low-income

borrowers for the review period was 5.3% by number, indicating a challenging home purchase loan environment for these borrowers. In 2019, the bank made 6.7% by number and 12.6% by dollar to low-income borrowers and was significantly below the assessment area demographic of 20.9% of low-income families in the assessment area. Performance exceeded the aggregate lending, which made 5.9% by number and 3.0% by dollar to low-income families.

In 2021, the bank's lending to moderate-income borrowers was 22.2% by number and 17.3% by dollar and exceeded the aggregate lending data, at 19.4% by number and 11.8% by dollar. The bank's performance was above the assessment area demographic of 16.9% of moderate-income families in the assessment area. In 2019 and 2020, the bank's lending to moderate-income borrowers was 6.7% and 11.1% by number, respectively, which was below the aggregate lending at 15.6% and 17.3%, respectively. By dollar amount, the bank's 2019 and 2020 lending performance of 3.4% and 8.6%, respectively, was below the 2019 and 2020 aggregate lending of 10.0% and 10.3%, respectively. The bank's lending for these years was also below the assessment area demographic of 16.9% of moderate-income families in the assessment area. In 2018, the bank's lending to moderate-income borrowers was 25.0% by number and 14.5% by dollar, which exceeded the aggregate lending of 19.8% by number and 12.9% by dollar. The bank's 2018 lending also exceeded the assessment area demographic of 16.9% moderate-income families in the assessment area. No home purchase loans were originated to moderate-income borrowers in 2016 and 2017.

Home Refinance Loans

Adirondack's home refinance lending performance to low- and moderate-income borrowers was reasonable. During the review period of 2016 to 2021, the bank only originated home refinance loans to low-income borrowers in 2017. The bank's performance was significantly below the aggregate lending and the assessment area demographic of 20.9% of low-income families in the assessment area. The average of the aggregate lending of loans to low-income borrowers for the review period was 4.7% by number, indicating a challenging home refinance loan environment for these borrowers. In 2017, the bank's lending to low-income borrowers was 6.3% by number and 3.2% by dollar and exceeded the aggregate lending, at 4.2% by number and 2.0% by dollar. The bank's performance was significantly below the assessment area demographic of 19.5% of low-income families in the assessment area.

In 2021, the bank's lending to moderate-income borrowers was 15.0% by number and 12.9% by dollar and was comparable to the aggregate lending data, at 14.6% by number, and exceeded the aggregate's 8.7% by dollar. The bank's performance was below the assessment area demographic of 16.9% of moderate-income families in the assessment area. From 2018 through 2020 the bank's home refinance lending performance was comparable to 2021, with the lending by number comparable to or exceeding the aggregate lending. In 2018, 2019, and 2020 the bank's home refinance lending to moderate-income borrowers, 14.3%, 25.0%, and 13.0% by number respectively, was comparable or exceeded the aggregate lending at 15.6%, 13.2%, 9.2%, respectively. By dollar amount from 2018 to 2020, the bank's performance of 7.0%, 20.7%, and 5.7%, respectively, was comparable to or exceeded the 2018 to 2020 aggregate lending of 11.3%, 7.8%, and 5.5%, respectively. The bank's lending performance in 2016 and 2017 was comparable

to the lending to assessment area demographic of moderate-income borrowers by number, 5.9% and 12.5%, respectively, and was below the aggregate lending, 12.5% and 16.6%, respectively. By dollar amount in 2016 and 2017, the bank's lending performance of 1.9% and 6.7%, respectively, was below both the assessment area demographic, and aggregate lending of 7.8% and 12.0%.

Home Improvement Loans

Adirondack's home improvement lending performance to low- and moderate-income borrowers was reasonable. The bank did not make any home improvement loans to low-income borrowers in 2021 and 2018 and was significantly below the aggregate lending and the 20.9% demographic of low-income families in the assessment area. The bank's lending performance for 2016, 2017, 2019, and 2020 exceeded the aggregate lending for home improvement loans made to low-income borrowers. In 2020, the bank's one loan to a low-income borrower was 50.0% by number and 73.4% by dollar, which exceeded the aggregate lending at 7.2% by number and 4.4% by dollar. In 2019, the bank's lending to low-income borrowers was 20.0% by number and 17.6% by dollar which exceeded the aggregate lending at 8.2% by number and 5.7% by dollar. In 2017, the bank's lending to low-income borrowers was 25.0% by number and 7.3% by dollar, which exceeded the aggregate lending at 17.5% by number and 4.8% by dollar. In 2016, the bank's one loan to a low-income borrower was 11.1% by number and 1.8% by dollar, which exceeded the aggregate lending at 8.8% by number and was comparable by dollar at 2.9%.

During the review period of 2016 to 2021, the bank only made home improvement loans to moderate-income borrowers in 2016 and 2019. As such, the bank's performance was significantly below the aggregate lending and the 2016 and 2019 assessment area demographics of 16.9% and 16.9%, respectively, of moderate-income families in the assessment area. In 2019, the bank's lending to moderate-income borrowers, at 10.0% by number and 9.8% by dollar, was below the aggregate lending at 17.3% by number, comparable to 11.3% by dollar, and below the assessment area demographic of moderate-income families in the assessment area at 16.9%. The bank's 2016 lending to moderate-income borrowers contrasted with the other years in the review period as the bank made loans at 44.4% by number and 5.3% by dollar, which exceeded the aggregate lending at 23.9% by number, significantly below 13.0% by dollar, and exceeded the assessment area demographic of moderate-income families in the assessment area at 16.9%.

Small Business Loans

The borrower distribution of small business loans reflected reasonable penetration among businesses of different revenue sizes.

In 2021, the bank made 57.1% of loans by number and 88.7% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses exceeded the aggregate lending, at 41.2% by number and 23.2% by dollar, while the bank's lending was below the assessment area demographic of 89.7% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also made 42.9% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs

of very small businesses. The bank’s lending performance for loans in amounts of \$100,000 or less, was below the aggregate lenders which made 92.2% of its loans to such businesses.

Community Development Test

Adirondack’s community development performance in the Non-Metropolitan assessment area demonstrated adequate responsiveness to the community development needs of the area. This assessment of performance considered Adirondack’s capacity and the need and availability of opportunities for community development activities in the Non-Metropolitan assessment area.

Adirondack’s community development loans targeting the Non-Metropolitan assessment area totaled \$190,000 or 0.3% of Adirondack’s community development activity. As the bank made no new community development investments during the review period in this assessment area, community development loans, by dollar amount made during the evaluation period, represented the majority of qualified assessment area community development activities. Compared to the prior evaluation, Adirondack’s community development loans and qualified investments made in this assessment area declined by 90.6%.

One of the two community development loans made in the Non-Metropolitan assessment area addressed community services, which was a specific need identified by a community contact.

Summary of Community Development Loans and Qualified Investments Non-Metropolitan Assessment Area By Primary Purpose Designation January 1, 2017 – June 30, 2022						
Designation	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
Affordable Housing	0	0	0	0	0	0
Community Services	40	1	0	0	40	1
Economic Development	150	1	0	0	150	1
Revitalize and Stabilize	0	0	0	0	0	0
Total	190	2	0	0	190	2
<i>Lending activity includes new loans and investments made during the evaluation period. Investment activity does not include charitable donations which are assessed separately.</i>						

Community Development Loans

Adirondack made \$190,000 in community development loans in the Non-Metropolitan assessment area. Of this total dollar amount of community development loans, 78.9% supported economic development and 21.1% financed community services.

Adirondack's community development loans included:

- A \$150,000 loan to a small business which supported economic development, specifically job retention for low- to moderate-income individuals.
- A \$40,000 loan to a hospice that serves counties in the Adirondack Region inclusive of Non-Metropolitan assessment area, which addressed critical care needs of individuals, including LMI populations without the ability to pay.

Community Development Investments

Adirondack made no qualified community development investments during the review period in the Non-Metropolitan assessment area. Charitable donations to community development organizations totaled \$73,951.

Examples of community development charitable donations included:

- A \$5,600 charitable donation to a nonprofit committed to sustainable local economic development.
- Charitable donations totaling \$9,100 to provide scholarships to LMI students attending a local community college where 55% of students are Pell Grant recipients.

Community Development Services

During the 66-month evaluation period, Adirondack provided four community development financial services. The provision of these services included Adirondack officers, directors, and employees serving on boards or committees of non-profit organizations. This was significantly lower than the 22 events held during the previous 39-month evaluation period. A contributing factor to the decreased services was due to the COVID-19 pandemic, which significantly limited in-person events and opportunities to provide community development services. Adirondack also developed ongoing partnerships with various community development organizations in order to gain knowledge of needs of the assessment area and improve the services the bank provided.

Examples of community development services included:

- A board membership at an affordable housing community development corporation.

METROPOLITAN AREA

MSA 45060 (SYRACUSE, NY)

LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MSA 45060 (SYRACUSE, NY)

A limited evaluation of Adirondack Bank's performance in MSA 45060 (Syracuse, NY) was completed. The bank's Syracuse assessment area consisted of 9 census tracts in Madison County, of which none were low-income and two were moderate-income. According to the 2015 Census Data, the bank's Syracuse assessment area had a population of 42,855, which is significantly less than the MSA 46540 (Utica-Rome, NY) and Non-Metropolitan assessment areas. According to the FFIEC 2021 Census Data there were 40 businesses within the assessment area. Adirondack had 0.5% of its lending activity in this assessment area during the evaluation period. The bank maintained no branches and one loan production office in the assessment area.

The subsequent table provides a summary of the Assessment Area Demographics for the MSA 45060 (Syracuse, NY) Assessment Area:

Assessment Area Demographics MSA 45060 (Syracuse, NY)				
Income Category	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0%	20.0%
Moderate Income	2	22.2	12.2%	19.9%
Middle Income	6	66.7	79.2%	23.0%
Upper Income	1	11.1	8.6%	37.1%
Unknown	0	0.0	0.0%	0.0%
Total	9	100.0	100.0%	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MSA 45060 (SYRACUSE) ASSESSMENT AREA

Adirondack's performance in MSA 45060 (Syracuse, NY) was not consistent with its overall satisfactory performance, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Community Development Test
MSA 45060 (Syracuse, NY)	Below	Below

During the evaluation period, Adirondack's performance under the lending test was not consistent with the bank's overall Satisfactory performance. Adirondack's penetration among individuals of different income levels and businesses of different sizes was poor. The geographic distribution of loans reflected a reasonable dispersion based on excellent HMDA penetration of LMI geographies and poor small business penetration. Refer to the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details of Adirondack's 2016 through 2021 loan distribution by geography, borrower income and business revenue size. Adirondack's performance was not consistent with its Outstanding performance under the Community Development Test. Charitable donations to community development organizations in the BSRA that included the MSA 45060 (Syracuse, NY) assessment area totaled \$20,500 and also provided 2 community development services in this assessment area. Community development performance was also below performance of the prior evaluation when the bank reported \$3.8 million in community development loans and qualified investments.

NON-METROPOLITAN ASSESSMENT AREA

(LEWIS COUNTY, NY)

LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NON-METROPOLITAN AREA (LEWIS COUNTY, NY)

A limited evaluation of Adirondack’s performance in the Non-Metropolitan (Lewis County, NY) was completed. The bank’s Non-Metropolitan (Lewis County) assessment area consisted of three census tracts, none were low-income, and one was moderate-income. According to the 2015 Census Data, the bank’s Non-Metropolitan (Lewis County, NY) assessment area had a population of 9,481, which is significantly less than the MSA 46540 (Utica-Rome, NY) and other Non-Metropolitan assessment areas. According to the FFIEC 2021 Census Data, the number of businesses within the assessment area were also comparably low, at 279. Adirondack had 1.1% of its lending activity in this assessment area during the evaluation period. The bank maintains no branches in the assessment area.

The subsequent table provides a summary of the Assessment Area Demographics for the Non-Metropolitan (Lewis County, NY) Assessment Area:

Assessment Area Demographics Non-Metropolitan (Lewis County, NY)				
Income Category	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0%	22.4%
Moderate Income	1	33.3	20.5%	20.3%
Middle Income	2	66.7	79.5%	21.1%
Upper Income	0	0.0	0.0%	36.2%
Unknown	0	0.0	0.0%	0.0%
Total	3	100.0	100.0%	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN ASSESSMENT AREA (LEWIS COUNTY)

Adirondack’s performance in the Non-Metropolitan (Lewis County, NY) assessment area was not consistent with its overall satisfactory performance, which was based on the full-scope assessment areas performance.

Assessment Area	Lending Test	Community Development Test
Non-Metropolitan (Lewis County, NY)	Below	Below

During the evaluation period, Adirondack’s performance under the lending test was not consistent with the bank’s overall Satisfactory performance. Adirondack’s penetration among individuals of different income levels and businesses of different sizes was poor. The geographic dispersion of loans reflected a reasonable distribution based on the reasonable HMDA penetration in LMI geographies and poor small business penetration. Refer to the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details of Adirondack’s 2016 through 2021 loan distribution by geography, borrower income and business revenue size. Adirondack’s performance was not consistent with its Outstanding performance under the Community Development Test. Adirondack did not make any community development loans or qualified investments or donations in the Non-Metropolitan (Lewis County, NY) assessment area.

**CRA APPENDIX A
AGGREGATE COMPARISON LOAN DISTRIBUTION TABLES**

Home Mortgage Lending by Income Level of Geography

Distribution of 2016 and 2017 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 46540 (Utica-Rome, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2016						2017						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$(000)	%	%	#	%	#	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	2.4	0	0.0	1.3	2	1.0	5.6	91	0.3	2.9	5.0
Moderate	7	3.3	9.0	342	1.1	5.7	8	3.9	7.5	677	2.1	5.2	7.2
Middle	133	63.0	56.8	19,048	61.3	53.8	113	55.4	56.1	14,574	46.0	51.6	60.0
Upper	71	33.6	31.8	11,684	37.6	39.1	81	39.7	30.8	16,359	51.6	40.3	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	211	100.0	100.0	31,074	100.0	100.0	204	100.0	100.0	31,701	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.7	0	0.0	0.8	2	1.8	2.7	85	0.7	1.5	5.0
Moderate	4	4.6	6.8	251	2.1	4.3	5	4.6	5.6	536	4.2	3.8	7.2
Middle	61	70.1	57.8	7,103	59.9	54.3	63	57.8	59.7	6,480	50.4	55.2	60.0
Upper	22	25.3	33.6	4,497	37.9	40.6	39	35.8	32.1	5,748	44.7	39.5	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	87	100.0	100.0	11,851	100.0	100.0	109	100.0	100.0	12,849	100.0	100.0	100.0
Home Improvement Loans													
Low	8	4.5	3.4	113	2.4	2.1	6	3.6	5.9	96	1.4	4.2	5.0
Moderate	16	9.1	8.8	446	9.4	6.5	9	5.3	5.2	323	4.6	4.4	7.2
Middle	113	64.2	63.6	2,876	60.8	58.9	107	63.3	63.8	3,468	49.6	57.3	60.0
Upper	39	22.2	24.2	1,295	27.4	32.5	47	27.8	25.0	3,098	44.4	34.2	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	176	100.0	100.0	4,730	100.0	100.0	169	100.0	100.0	6,985	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	50.0	20.0	92	44.2	59.7	2	66.7	14.3	117	28.1	0.4	25.7
Moderate	0	0.0	10.0	0	0.0	3.2	1	33.3	28.6	300	71.9	13.3	19.5
Middle	1	50.0	40.0	116	55.8	13.6	0	0.0	42.9	0	0.0	69.4	38.6
Upper	0	0.0	30.0	0	0.0	23.4	0	0.0	14.3	0	0.0	17.0	16.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	208	100.0	100.0	3	100.0	100.0	417	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	9	1.9	2.4	205	0.4	4.3	12	2.5	4.8	389	0.7	2.5	5.0
Moderate	27	5.7	8.2	1,039	2.2	5.2	23	4.7	6.5	1,836	3.5	5.2	7.2
Middle	308	64.7	58.4	29,143	60.9	52.0	283	58.4	58.9	24,522	47.2	53.8	60.0
Upper	132	27.7	30.9	17,476	36.5	38.5	167	34.4	29.8	25,205	48.5	38.5	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	476	100.0	100.0	47,863	100.0	100.0	485	100.0	100.0	51,952	100.0	100.0	100.0

Source: 2017 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 46540 (Utica-Rome, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	3	1.4	4.9	182	0.6	2.9	4	2.8	5.8	220	0.9	3.5	5.0
Moderate	13	6.2	8.1	1,226	3.8	5.3	6	4.2	8.5	441	1.8	5.8	7.2
Middle	105	50.2	55.1	13,329	41.6	50.6	79	55.6	56.3	12,468	50.4	53.0	60.0
Upper	88	42.1	31.9	17,339	54.1	41.1	53	37.3	29.3	11,629	47.0	37.7	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	209	100.0	100.0	32,076	100.0	100.0	142	100.0	100.0	24,758	100.0	100.0	100.0
Refinance Loans													
Low	4	3.3	2.9	199	1.4	1.5	9	7.6	4.0	534	3.8	2.4	5.0
Moderate	6	4.9	5.8	349	2.4	4.2	10	8.5	5.6	1,032	7.3	3.9	7.2
Middle	64	52.5	57.3	6,004	41.4	51.8	60	50.8	57.3	6,428	45.7	53.0	60.0
Upper	48	39.3	34.0	7,955	54.8	42.4	39	33.1	33.1	6,076	43.2	40.7	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	122	100.0	100.0	14,507	100.0	100.0	118	100.0	100.0	14,070	100.0	100.0	100.0
Home Improvement Loans													
Low	4	7.0	3.6	169	5.5	2.8	2	4.5	4.7	38	1.7	3.2	5.0
Moderate	3	5.3	5.6	188	6.1	5.2	2	4.5	4.2	48	2.2	2.7	7.2
Middle	30	52.6	56.2	1,266	40.9	52.9	27	61.4	59.5	1,328	60.3	56.5	60.0
Upper	20	35.1	34.7	1,470	47.5	39.2	13	29.5	31.5	790	35.8	37.7	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	57	100.0	100.0	3,093	100.0	100.0	44	100.0	100.0	2,204	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	20.0	10.0	83	12.6	0.4	1	25.0	20.8	330	25.6	16.0	25.7
Moderate	1	20.0	20.0	149	22.6	7.4	0	0.0	4.2	0	0.0	0.2	19.5
Middle	3	60.0	50.0	428	64.8	58.2	2	50.0	54.2	207	16.1	15.8	38.6
Upper	0	0.0	20.0	0	0.0	34.0	1	25.0	16.7	750	58.3	19.8	16.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.2	0	0.0	48.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	660	100.0	100.0	4	100.0	100.0	1,287	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	12	3.1	4.3	633	1.3	2.4	16	5.2	5.3	1,122	2.7	3.8	5.0
Moderate	23	5.9	7.3	1,912	3.8	5.3	18	5.8	7.2	1,521	3.6	4.9	7.2
Middle	202	51.4	56.1	21,027	41.8	52.0	168	54.5	56.9	20,431	48.3	51.1	60.0
Upper	156	39.7	32.3	26,764	53.2	40.2	106	34.4	30.7	19,245	45.5	37.8	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	2.4	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	393	100.0	100.0	50,336	100.0	100.0	308	100.0	100.0	42,319	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 46540 (Utica-Rome, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	4	3.3	4.4	273	1.3	2.7	5	4.4	5.7	353	1.6	3.7	5.0
Moderate	8	6.6	8.5	690	3.2	5.9	8	7.0	8.9	810	3.7	6.1	7.2
Middle	53	43.4	55.7	7,671	36.0	51.4	48	42.1	54.0	7,067	32.3	49.3	60.0
Upper	57	46.7	31.4	12,675	59.5	40.0	53	46.5	31.4	13,618	62.3	40.8	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	122	100.0	100.0	21,309	100.0	100.0	114	100.0	100.0	21,848	100.0	100.0	100.0
Refinance Loans													
Low	2	1.1	1.6	116	0.4	0.9	2	1.0	2.5	83	0.3	1.5	5.0
Moderate	10	5.6	4.7	908	2.9	2.9	6	3.0	5.3	475	1.4	3.4	7.2
Middle	76	42.7	52.6	12,004	38.8	47.8	103	51.2	54.5	14,058	42.6	49.7	60.0
Upper	90	50.6	41.1	17,916	57.9	48.5	90	44.8	37.7	18,369	55.7	45.4	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	178	100.0	100.0	30,944	100.0	100.0	201	100.0	100.0	32,985	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.8	0	0.0	3.9	1	5.6	2.4	75	5.7	1.6	5.0
Moderate	0	0.0	4.6	0	0.0	4.1	0	0.0	5.6	0	0.0	4.1	7.2
Middle	13	65.0	54.7	688	54.5	56.3	10	55.6	55.0	612	46.9	52.3	60.0
Upper	7	35.0	35.8	574	45.5	35.7	7	38.9	37.0	618	47.4	42.0	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	1,262	100.0	100.0	18	100.0	100.0	1,305	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	33.3	0	0.0	36.6	0	0.0	36.8	0	0.0	63.5	25.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	5.3	0	0.0	3.1	19.5
Middle	1	100.0	38.9	90	100.0	22.8	2	100.0	42.1	675	100.0	27.0	38.6
Upper	0	0.0	22.2	0	0.0	12.4	0	0.0	15.8	0	0.0	6.4	16.1
Unknown	0	0.0	5.6	0	0.0	28.3	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	90	100.0	100.0	2	100.0	100.0	675	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	6	1.9	3.6	389	0.7	4.2	8	2.4	4.1	511	0.9	4.7	5.0
Moderate	18	5.6	6.7	1,598	3.0	4.3	14	4.2	7.1	1,285	2.3	4.9	7.2
Middle	143	44.5	54.8	20,453	38.2	48.6	163	48.7	54.2	22,412	39.4	48.7	60.0
Upper	154	48.0	34.9	31,165	58.1	41.0	150	44.8	34.6	32,605	57.4	41.7	27.8
Unknown	0	0.0	0.0	0	0.0	1.8	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	321	100.0	100.0	53,605	100.0	100.0	335	100.0	100.0	56,813	100.0	100.0	100.0
2011-2015 U.S. Census Bureau: American Community Survey 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Distribution of 2016 and 2017 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2016						2017						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	0.6	0	0.0	0.5	0.5
Moderate	0	0.0	10.4	0	0.0	6.7	0	0.0	8.2	0	0.0	5.4	11.2
Middle	3	30.0	53.8	571	28.1	53.2	5	35.7	63.4	1,005	37.7	58.9	64.5
Upper	7	70.0	34.8	1,463	71.9	39.6	9	64.3	27.8	1,660	62.3	35.2	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	2,034	100.0	100.0	14	100.0	100.0	2,665	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.7	0	0.0	0.3	0	0.0	0.8	0	0.0	0.6	0.5
Moderate	1	5.9	8.6	53	2.2	6.5	0	0.0	9.6	0	0.0	6.4	11.2
Middle	9	52.9	55.7	1,272	51.7	54.8	12	75.0	60.9	1,798	66.5	58.5	64.5
Upper	7	41.2	34.8	1,137	46.2	38.1	4	25.0	28.7	907	33.5	34.5	23.8
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	2,462	100.0	100.0	16	100.0	100.0	2,705	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.8	0	0.0	0.6	0	0.0	1.4	0	0.0	2.4	0.5
Moderate	1	11.1	10.6	8	1.8	7.2	2	10.0	9.3	16	2.9	4.0	11.2
Middle	5	55.6	57.3	273	60.3	58.1	9	45.0	66.1	383	68.4	61.0	64.5
Upper	3	33.3	31.4	172	38.0	34.1	9	45.0	23.2	161	28.8	32.6	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	453	100.0	100.0	20	100.0	100.0	560	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	6.7	0	0.0	7.5	7.6
Moderate	1	100.0	46.2	248	100.0	62.1	0	0.0	13.3	0	0.0	17.4	16.3
Middle	0	0.0	23.1	0	0.0	16.1	1	100.0	40.0	62	100.0	46.7	43.7
Upper	0	0.0	30.8	0	0.0	21.8	0	0.0	40.0	0	0.0	28.4	30.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	248	100.0	100.0	1	100.0	100.0	62	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.9	0	0.0	0.4	0	0.0	0.8	0	0.0	0.8	0.5
Moderate	3	8.1	10.2	309	5.9	7.5	2	3.9	8.7	16	0.3	5.8	11.2
Middle	17	45.9	54.6	2,116	40.7	53.3	27	52.9	63.1	3,248	54.2	58.6	64.5
Upper	17	45.9	34.2	2,772	53.3	38.7	22	43.1	27.4	2,728	45.5	34.8	23.8
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	5,197	100.0	100.0	51	100.0	100.0	5,992	100.0	100.0	100.0

Source: 2017 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans													
Low	0	0.0	0.7	0	0.0	0.6	0	0.0	0.8	0	0.0	0.6	0.5
Moderate	2	16.7	8.8	146	6.5	5.8	0	0.0	7.8	0	0.0	4.8	11.2
Middle	5	41.7	62.9	1,118	49.6	57.4	7	46.7	65.8	1,070	31.9	60.9	64.5
Upper	5	41.7	27.6	990	43.9	36.3	8	53.3	25.6	2,287	68.1	33.7	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	2,254	100.0	100.0	15	100.0	100.0	3,357	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.9	0	0.0	0.8	0	0.0	0.3	0	0.0	0.3	0.5
Moderate	0	0.0	9.5	0	0.0	6.2	0	0.0	9.2	0	0.0	5.3	11.2
Middle	8	57.1	64.5	882	37.0	61.4	7	58.3	60.7	918	59.1	51.9	64.5
Upper	6	42.9	25.1	1,499	63.0	31.6	5	41.7	29.8	635	40.9	42.5	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	2,381	100.0	100.0	12	100.0	100.0	1,553	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	0.6	0.5
Moderate	0	0.0	11.0	0	0.0	7.9	0	0.0	12.2	0	0.0	8.1	11.2
Middle	2	33.3	62.9	210	46.0	60.4	3	30.0	61.7	258	42.1	62.4	64.5
Upper	4	66.7	26.2	247	54.0	31.7	7	70.0	25.0	355	57.9	28.9	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	457	100.0	100.0	10	100.0	100.0	613	100.0	100.0	100.0
Multifamily Loans												Multi-family Units %	
Low	0	0.0	4.2	0	0.0	0.6	0	0.0	9.5	0	0.0	8.7	7.6
Moderate	0	0.0	4.2	0	0.0	0.7	0	0.0	19.0	0	0.0	2.7	16.3
Middle	1	100.0	75.0	2,255	100.0	57.5	0	0.0	47.6	0	0.0	69.3	43.7
Upper	0	0.0	16.7	0	0.0	41.1	2	100.0	19.0	847	100.0	7.8	30.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.8	0	0.0	11.6	1.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	2,255	100.0	100.0	2	100.0	100.0	847	100.0	100.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %	
Low	0	0.0	0.7	0	0.0	0.6	0	0.0	0.8	0	0.0	1.1	0.5
Moderate	2	6.1	9.2	146	2.0	5.6	0	0.0	8.9	0	0.0	5.0	11.2
Middle	16	48.5	63.6	4,465	60.8	58.6	17	43.6	63.8	2,246	35.3	59.4	64.5
Upper	15	45.5	26.5	2,736	37.2	35.2	22	56.4	26.4	4,124	64.7	33.6	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	33	100.0	100.0	7,347	100.0	100.0	39	100.0	100.0	6,370	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.5	0	0.0	0.3	0.5
Moderate	0	0.0	8.7	0	0.0	5.0	0	0.0	13.0	0	0.0	7.5	11.2
Middle	2	22.2	65.3	423	18.2	58.1	3	33.3	62.0	367	20.7	57.7	64.5
Upper	7	77.8	25.8	1,898	81.8	36.8	6	66.7	24.4	1,409	79.3	34.4	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	2,321	100.0	100.0	9	100.0	100.0	1,776	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.6	0	0.0	0.4	0.5
Moderate	0	0.0	5.9	0	0.0	3.7	1	5.0	7.3	140	3.3	4.1	11.2
Middle	9	39.1	56.2	1,823	43.8	51.5	8	40.0	60.6	1,740	40.6	53.1	64.5
Upper	14	60.9	37.3	2,339	56.2	44.4	11	55.0	31.5	2,410	56.2	42.3	23.8
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	4,162	100.0	100.0	20	100.0	100.0	4,290	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.6	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	0	0.0	13.8	0	0.0	7.3	0	0.0	9.2	0	0.0	8.2	11.2
Middle	2	100.0	58.7	143	100.0	55.8	0	0.0	70.3	0	0.0	66.9	64.5
Upper	0	0.0	26.9	0	0.0	36.6	2	100.0	20.5	475	100.0	24.9	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	143	100.0	100.0	2	100.0	100.0	475	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	7.6
Moderate	0	0.0	25.0	0	0.0	10.2	0	0.0	25.0	0	0.0	35.2	16.3
Middle	0	0.0	58.3	0	0.0	85.0	1	50.0	45.8	430	76.0	50.9	43.7
Upper	0	0.0	16.7	0	0.0	4.8	1	50.0	29.2	136	24.0	13.9	30.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	566	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.5	0	0.0	0.4	0.5
Moderate	0	0.0	8.2	0	0.0	4.8	1	3.0	10.3	140	2.0	7.0	11.2
Middle	13	38.2	61.7	2,389	36.1	56.5	12	36.4	61.9	2,537	35.7	55.5	64.5
Upper	21	61.8	29.7	4,237	63.9	38.5	20	60.6	27.2	4,430	62.3	37.1	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	6,626	100.0	100.0	33	100.0	100.0	7,107	100.0	100.0	100.0
2011-2015 U.S. Census Bureau: American Community Survey													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Distribution of 2016 and 2017 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2016						2017						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.2	0	0.0	2.3	0	0.0	15.2	0	0.0	12.3	12.2
Middle	1	100.0	96.8	160	100.0	97.7	0	0.0	75.6	0	0.0	77.4	79.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	9.2	0	0.0	10.4	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	160	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.8	0	0.0	2.1	0	0.0	14.5	0	0.0	11.8	12.2
Middle	0	0.0	97.2	0	0.0	97.9	0	0.0	74.6	0	0.0	77.7	79.2
Upper	0	0.0	0.0	0	0.0	0.0	1	100.0	11.0	25	100.0	10.5	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	25	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	3.8	8	100.0	2.4	2	66.7	17.7	8	28.6	8.0	12.2
Middle	0	0.0	96.2	0	0.0	97.6	1	33.3	72.8	20	71.4	73.3	79.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	9.5	0	0.0	18.7	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	8	100.0	100.0	3	100.0	100.0	28	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.0	0	0.0	0.1	0	0.0	100.0	0	0.0	100.0	41.9
Middle	0	0.0	80.0	0	0.0	99.9	0	0.0	0.0	0	0.0	0.0	46.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	11.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	3.3	8	4.8	2.2	2	50.0	15.5	8	15.1	12.0	12.2
Middle	1	50.0	96.7	160	95.2	97.8	1	25.0	74.8	20	37.7	77.1	79.2
Upper	0	0.0	0.0	0	0.0	0.0	1	25.0	9.6	25	47.2	10.8	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	168	100.0	100.0	4	100.0	100.0	53	100.0	100.0	100.0

Source: 2017 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	33.3	15.1	84	17.6	11.0	0	0.0	14.0	0	0.0	9.6	12.2
Middle	0	0.0	75.4	0	0.0	77.2	0	0.0	78.9	0	0.0	81.9	79.2
Upper	2	66.7	9.5	393	82.4	11.8	1	100.0	7.1	304	100.0	8.5	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	477	100.0	100.0	1	100.0	100.0	304	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	15.9	0	0.0	12.6	0	0.0	12.7	0	0.0	8.5	12.2
Middle	0	0.0	74.4	0	0.0	76.9	0	0.0	74.1	0	0.0	75.6	79.2
Upper	0	0.0	9.7	0	0.0	10.5	1	100.0	13.1	35	100.0	15.9	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	35	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.5	0	0.0	15.1	0	0.0	4.3	0	0.0	3.7	12.2
Middle	0	0.0	75.9	0	0.0	79.1	0	0.0	86.2	0	0.0	85.9	79.2
Upper	0	0.0	7.6	0	0.0	5.9	0	0.0	9.6	0	0.0	10.4	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	33.3	0	0.0	88.7	0	0.0	66.7	0	0.0	74.2	41.9
Middle	0	0.0	66.7	0	0.0	11.3	0	0.0	33.3	0	0.0	25.8	46.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	11.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	33.3	14.8	84	17.6	13.4	0	0.0	13.0	0	0.0	11.0	12.2
Middle	0	0.0	75.8	0	0.0	75.6	0	0.0	78.1	0	0.0	79.2	79.2
Upper	2	66.7	9.4	393	82.4	11.0	2	100.0	8.9	339	100.0	9.9	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	477	100.0	100.0	2	100.0	100.0	339	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	17.8	0	0.0	13.6	0	0.0	19.0	0	0.0	14.0	12.2
Middle	0	0.0	72.5	0	0.0	75.6	0	0.0	71.3	0	0.0	74.1	79.2
Upper	0	0.0	9.7	0	0.0	10.8	1	100.0	9.7	250	100.0	11.9	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	250	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.5	0	0.0	6.2	1	33.3	11.4	95	21.3	8.6	12.2
Middle	0	0.0	83.4	0	0.0	86.4	1	33.3	82.2	250	56.2	84.3	79.2
Upper	0	0.0	7.1	0	0.0	7.4	1	33.3	6.3	100	22.5	7.0	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	445	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.9	0	0.0	3.5	0	0.0	9.4	0	0.0	7.1	12.2
Middle	0	0.0	88.2	0	0.0	91.4	0	0.0	84.4	0	0.0	85.3	79.2
Upper	1	100.0	5.9	20	100.0	5.1	0	0.0	6.3	0	0.0	7.6	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	20	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans												Multi-family Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	50.0	0	0.0	61.8	0	0.0	50.0	0	0.0	51.0	41.9
Middle	0	0.0	50.0	0	0.0	38.2	0	0.0	50.0	0	0.0	49.0	46.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	11.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.6	0	0.0	10.8	1	25.0	14.9	95	13.7	11.7	12.2
Middle	0	0.0	77.8	0	0.0	79.8	1	25.0	77.1	250	36.0	78.3	79.2
Upper	1	100.0	8.7	20	100.0	9.4	2	50.0	8.0	350	50.4	10.0	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	20	100.0	100.0	4	100.0	100.0	695	100.0	100.0	100.0
2011-2015 U.S. Census Bureau: American Community Survey													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Distribution of 2016 and 2017 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA (Lewis County)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2016						2017						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	1	33.3	22.2	180	25.3	28.4	20.5
Middle	2	100.0	100.0	311	100.0	100.0	2	66.7	77.8	531	74.7	71.6	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	311	100.0	100.0	3	100.0	100.0	711	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	1	100.0	27.7	38	100.0	26.7	20.5
Middle	2	100.0	100.0	293	100.0	100.0	0	0.0	72.3	0	0.0	73.3	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	293	100.0	100.0	1	100.0	100.0	38	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	15.3	0	0.0	13.6	20.5
Middle	4	100.0	100.0	100	100.0	100.0	4	100.0	84.7	130	100.0	86.4	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	100	100.0	100.0	4	100.0	100.0	130	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	77.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	2	25.0	21.6	218	24.8	26.8	20.5
Middle	8	100.0	100.0	704	100.0	100.0	6	75.0	78.4	661	75.2	73.2	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	704	100.0	100.0	8	100.0	100.0	879	100.0	100.0	100.0

Source: 2017 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA (Lewis County)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	24.1	0	0.0	20.5	1	100.0	15.4	286	100.0	17.1	20.5
Middle	1	100.0	75.9	68	100.0	79.5	0	0.0	84.6	0	0.0	82.9	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	68	100.0	100.0	1	100.0	100.0	286	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	24.5	0	0.0	31.5	1	50.0	17.2	210	82.0	23.5	20.5
Middle	3	100.0	75.5	139	100.0	68.5	1	50.0	82.8	46	18.0	76.5	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	139	100.0	100.0	2	100.0	100.0	256	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.0	0	0.0	26.4	1	100.0	38.5	53	100.0	43.6	20.5
Middle	0	0.0	80.0	0	0.0	73.6	0	0.0	61.5	0	0.0	56.4	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	53	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	77.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	23.5	0	0.0	24.2	3	75.0	19.0	549	92.3	20.7	20.5
Middle	4	100.0	76.5	207	100.0	75.8	1	25.0	81.0	46	7.7	79.3	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	207	100.0	100.0	4	100.0	100.0	595	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Non-MSA (Lewis County)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	24.3	100	100.0	30.4	2	100.0	17.1	612	100.0	20.6	20.5
Middle	0	0.0	75.7	0	0.0	69.6	0	0.0	82.9	0	0.0	79.4	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	100	100.0	100.0	2	100.0	100.0	612	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	29.1	0	0.0	37.3	0	0.0	25.7	0	0.0	27.7	20.5
Middle	2	100.0	70.9	354	100.0	62.7	2	100.0	74.3	71	100.0	72.3	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	354	100.0	100.0	2	100.0	100.0	71	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	27.6	0	0.0	40.7	0	0.0	19.0	0	0.0	21.4	20.5
Middle	1	100.0	72.4	30	100.0	59.3	2	100.0	81.0	160	100.0	78.6	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	30	100.0	100.0	2	100.0	100.0	160	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	77.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	25.0	25.8	100	20.7	33.7	2	33.3	21.3	612	72.6	23.8	20.5
Middle	3	75.0	74.2	384	79.3	66.3	4	66.7	78.7	231	27.4	76.2	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	484	100.0	100.0	6	100.0	100.0	843	100.0	100.0	100.0
2011-2015 U.S. Census Bureau: American Community Survey													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Home Mortgage Lending by Borrower Income Level

Distribution of 2016 and 2017 Home Mortgage Lending By Borrower Income Level Assessment Area: MSA 46540 (Utica-Rome, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2016						2017						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	9	4.3	8.3	648	2.1	4.8	8	3.9	7.9	473	1.5	4.6	22.0
Moderate	31	14.7	23.0	2,379	7.7	17.4	35	17.2	22.4	3,603	11.4	17.0	16.9
Middle	43	20.4	25.4	5,163	16.6	24.2	55	27.0	23.5	7,002	22.1	22.8	21.5
Upper	125	59.2	31.6	22,648	72.9	44.1	103	50.5	31.3	20,228	63.8	43.0	39.6
Unknown	3	1.4	11.8	236	0.8	9.6	3	1.5	14.9	395	1.2	12.6	0.0
Total	211	100.0	100.0	31,074	100.0	100.0	204	100.0	100.0	31,701	100.0	100.0	100.0
Refinance Loans													
Low	4	4.6	5.4	201	1.7	2.9	10	9.2	7.9	940	7.3	5.0	22.0
Moderate	15	17.2	15.0	1,372	11.6	11.2	16	14.7	16.3	1,373	10.7	12.1	16.9
Middle	21	24.1	24.3	1,503	12.7	19.7	30	27.5	25.2	3,621	28.2	22.2	21.5
Upper	43	49.4	46.1	8,487	71.6	55.1	50	45.9	43.3	6,489	50.5	51.7	39.6
Unknown	4	4.6	9.1	288	2.4	11.0	3	2.8	7.3	426	3.3	9.1	0.0
Total	87	100.0	100.0	11,851	100.0	100.0	109	100.0	100.0	12,849	100.0	100.0	100.0
Home Improvement Loans													
Low	23	13.1	9.9	347	7.3	5.2	28	16.6	12.6	430	6.2	6.3	22.0
Moderate	46	26.1	23.3	657	13.9	15.1	29	17.2	20.5	718	10.3	13.0	16.9
Middle	41	23.3	26.9	979	20.7	24.6	38	22.5	28.4	1,195	17.1	23.2	21.5
Upper	63	35.8	38.6	2,680	56.7	52.5	66	39.1	36.8	4,464	63.9	53.7	39.6
Unknown	3	1.7	1.4	67	1.4	2.6	8	4.7	1.7	178	2.5	3.8	0.0
Total	176	100.0	100.0	4,730	100.0	100.0	169	100.0	100.0	6,985	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	36	7.6	7.6	1,196	2.5	4.1	46	9.5	9.0	1,843	3.6	4.8	22.0
Moderate	92	19.4	20.3	4,408	9.2	15.1	80	16.6	20.2	5,694	11.0	15.3	16.9
Middle	105	22.2	25.3	7,645	16.0	22.6	123	25.5	25.1	11,818	22.9	22.7	21.5
Upper	231	48.7	37.9	33,815	71.0	48.4	219	45.4	36.0	31,181	60.5	46.2	39.6
Unknown	10	2.1	8.8	591	1.2	9.7	14	2.9	9.7	999	1.9	11.1	0.0
Total	474	100.0	100.0	47,655	100.0	100.0	482	100.0	100.0	51,535	100.0	100.0	100.0
Source: 2017 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 46540 (Utica-Rome, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	9	4.3	8.3	686	2.1	4.7	7	4.9	11.4	523	2.1	6.8	22.0
Moderate	43	20.6	25.4	3,995	12.5	18.8	24	16.9	26.1	2,349	9.5	20.2	16.9
Middle	39	18.7	25.1	5,023	15.7	23.7	32	22.5	23.5	4,664	18.8	22.6	21.5
Upper	115	55.0	34.1	21,902	68.3	46.1	77	54.2	27.5	17,026	68.8	39.5	39.6
Unknown	3	1.4	7.1	470	1.5	6.7	2	1.4	11.6	196	0.8	10.9	0.0
Total	209	100.0	100.0	32,076	100.0	100.0	142	100.0	100.0	24,758	100.0	100.0	100.0
Refinance Loans													
Low	9	7.4	8.7	398	2.7	5.5	11	9.3	10.8	789	5.6	6.7	22.0
Moderate	18	14.8	17.4	1,376	9.5	12.9	25	21.2	19.0	1,900	13.5	14.0	16.9
Middle	24	19.7	24.9	2,101	14.5	22.3	23	19.5	25.8	2,584	18.4	23.7	21.5
Upper	69	56.6	43.0	10,312	71.1	53.4	57	48.3	38.7	8,323	59.2	48.0	39.6
Unknown	2	1.6	6.0	320	2.2	5.9	2	1.7	5.8	474	3.4	7.6	0.0
Total	122	100.0	100.0	14,507	100.0	100.0	118	100.0	100.0	14,070	100.0	100.0	100.0
Home Improvement Loans													
Low	9	15.8	9.6	264	8.5	5.8	6	13.6	13.1	244	11.1	9.8	22.0
Moderate	9	15.8	16.7	290	9.4	13.4	9	20.5	19.6	526	23.9	17.2	16.9
Middle	8	14.0	22.1	439	14.2	21.3	7	15.9	28.0	286	13.0	25.6	21.5
Upper	30	52.6	49.4	2,065	66.8	57.6	22	50.0	38.5	1,148	52.1	46.7	39.6
Unknown	1	1.8	2.2	35	1.1	1.9	0	0.0	0.7	0	0.0	0.6	0.0
Total	57	100.0	100.0	3,093	100.0	100.0	44	100.0	100.0	2,204	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	27	7.0	8.2	1,348	2.7	4.8	24	7.9	11.1	1,556	3.8	6.8	22.0
Moderate	70	18.0	21.0	5,661	11.4	16.4	58	19.1	22.2	4,775	11.6	17.8	16.9
Middle	71	18.3	24.1	7,563	15.2	22.7	62	20.4	24.1	7,534	18.4	22.5	21.5
Upper	214	55.2	38.0	34,279	69.0	48.3	156	51.3	32.1	26,497	64.6	42.0	39.6
Unknown	6	1.5	8.6	825	1.7	7.8	4	1.3	10.5	670	1.6	10.9	0.0
Total	388	100.0	100.0	49,676	100.0	100.0	304	100.0	100.0	41,032	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 46540 (Utica-Rome, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	5	4.1	9.8	250	1.2	5.9	4	3.5	10.6	436	2.0	6.4	22.0
Moderate	20	16.4	25.7	2,032	9.5	20.1	8	7.0	23.2	685	3.1	17.9	16.9
Middle	27	22.1	24.1	3,755	17.6	23.8	29	25.4	23.7	4,537	20.8	22.7	21.5
Upper	61	50.0	29.8	12,872	60.4	40.5	68	59.6	28.9	15,318	70.1	40.1	39.6
Unknown	9	7.4	10.7	2,400	11.3	9.7	5	4.4	13.6	872	4.0	12.9	0.0
Total	122	100.0	100.0	21,309	100.0	100.0	114	100.0	100.0	21,848	100.0	100.0	100.0
Refinance Loans													
Low	5	2.8	5.3	319	1.0	2.5	9	4.5	6.6	609	1.8	3.8	22.0
Moderate	20	11.2	15.7	1,988	6.4	10.7	31	15.4	17.2	3,151	9.6	12.4	16.9
Middle	29	16.3	23.8	3,643	11.8	19.4	48	23.9	25.5	6,273	19.0	22.6	21.5
Upper	119	66.9	45.9	24,516	79.2	56.4	109	54.2	42.5	22,534	68.3	51.6	39.6
Unknown	5	2.8	9.3	478	1.5	11.0	4	2.0	8.2	418	1.3	9.6	0.0
Total	178	100.0	100.0	30,944	100.0	100.0	201	100.0	100.0	32,985	100.0	100.0	100.0
Home Improvement Loans													
Low	3	15.0	8.9	86	6.8	6.4	0	0.0	7.1	0	0.0	5.2	22.0
Moderate	3	15.0	19.5	233	18.5	17.4	4	22.2	16.4	267	20.5	11.8	16.9
Middle	5	25.0	24.7	247	19.6	21.0	4	22.2	25.6	378	29.0	22.6	21.5
Upper	9	45.0	45.3	696	55.2	53.5	10	55.6	50.3	660	50.6	60.1	39.6
Unknown	0	0.0	1.6	0	0.0	1.7	0	0.0	0.6	0	0.0	0.3	0.0
Total	20	100.0	100.0	1,262	100.0	100.0	18	100.0	100.0	1,305	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	13	4.1	7.4	655	1.2	4.4	13	3.9	8.5	1,045	1.9	5.2	22.0
Moderate	43	13.4	20.1	4,253	7.9	15.6	43	12.9	19.6	4,103	7.3	15.2	16.9
Middle	61	19.1	22.9	7,645	14.3	21.2	81	24.3	24.4	11,188	19.9	22.5	21.5
Upper	189	59.1	36.3	38,084	71.2	46.5	187	56.2	36.5	38,512	68.6	45.7	39.6
Unknown	14	4.4	13.3	2,878	5.4	12.3	9	2.7	10.9	1,290	2.3	11.5	0.0
Total	320	100.0	100.0	53,515	100.0	100.0	333	100.0	100.0	56,138	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2016 and 2017 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2016						2017						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	3.1	0	0.0	1.4	0	0.0	4.9	0	0.0	2.1	20.9
Moderate	0	0.0	16.2	0	0.0	10.1	0	0.0	17.7	0	0.0	11.6	16.9
Middle	1	10.0	25.5	145	7.1	22.2	1	7.1	23.8	181	6.8	20.3	20.5
Upper	9	90.0	39.0	1,889	92.9	51.2	13	92.9	38.6	2,484	93.2	53.6	41.7
Unknown	0	0.0	16.1	0	0.0	15.1	0	0.0	15.1	0	0.0	12.3	0.0
Total	10	100.0	100.0	2,034	100.0	100.0	14	100.0	100.0	2,665	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.1	0	0.0	2.4	1	6.3	4.2	87	3.2	2.0	20.9
Moderate	1	5.9	12.5	47	1.9	7.8	2	12.5	16.6	180	6.7	12.0	16.9
Middle	4	23.5	19.6	507	20.6	15.5	4	25.0	22.1	600	22.2	19.3	20.5
Upper	12	70.6	42.2	1,908	77.5	53.5	9	56.3	36.9	1,838	67.9	46.8	41.7
Unknown	0	0.0	22.6	0	0.0	20.8	0	0.0	20.2	0	0.0	20.0	0.0
Total	17	100.0	100.0	2,462	100.0	100.0	16	100.0	100.0	2,705	100.0	100.0	100.0
Home Improvement Loans													
Low	1	11.1	8.8	8	1.8	2.9	5	25.0	17.5	41	7.3	4.8	20.9
Moderate	4	44.4	23.9	24	5.3	13.0	0	0.0	19.1	0	0.0	11.6	16.9
Middle	1	11.1	25.6	50	11.0	19.1	6	30.0	24.9	283	50.5	20.7	20.5
Upper	3	33.3	39.4	371	81.9	61.5	9	45.0	36.9	236	42.1	51.5	41.7
Unknown	0	0.0	2.3	0	0.0	3.5	0	0.0	1.6	0	0.0	11.4	0.0
Total	9	100.0	100.0	453	100.0	100.0	20	100.0	100.0	560	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	2.8	4.0	8	0.2	1.7	6	12.0	6.6	128	2.2	2.2	20.9
Moderate	5	13.9	16.5	71	1.4	9.6	2	4.0	17.7	180	3.0	11.7	16.9
Middle	6	16.7	24.1	702	14.2	20.3	11	22.0	23.6	1,064	17.9	20.1	20.5
Upper	24	66.7	39.8	4,168	84.2	52.3	31	62.0	37.9	4,558	76.9	52.1	41.7
Unknown	0	0.0	15.5	0	0.0	16.0	0	0.0	14.2	0	0.0	13.9	0.0
Total	36	100.0	100.0	4,949	100.0	100.0	50	100.0	100.0	5,930	100.0	100.0	100.0
Source: 2017 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	6.4	0	0.0	3.1	1	6.7	5.9	423	12.6	3.0	20.9
Moderate	3	25.0	19.8	326	14.5	12.9	1	6.7	15.6	114	3.4	10.0	16.9
Middle	1	8.3	25.6	60	2.7	22.2	1	6.7	23.7	140	4.2	20.3	20.5
Upper	8	66.7	37.8	1,868	82.9	51.7	11	73.3	40.1	2,495	74.3	52.6	41.7
Unknown	0	0.0	10.4	0	0.0	10.0	1	6.7	14.6	185	5.5	14.0	0.0
Total	12	100.0	100.0	2,254	100.0	100.0	15	100.0	100.0	3,357	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	9.0	0	0.0	5.2	0	0.0	5.7	0	0.0	2.7	20.9
Moderate	2	14.3	15.6	167	7.0	11.3	3	25.0	13.2	322	20.7	7.8	16.9
Middle	3	21.4	23.6	331	13.9	20.6	3	25.0	27.3	251	16.2	22.4	20.5
Upper	9	64.3	46.1	1,883	79.1	57.0	6	50.0	44.7	980	63.1	57.4	41.7
Unknown	0	0.0	5.7	0	0.0	5.9	0	0.0	9.2	0	0.0	9.7	0.0
Total	14	100.0	100.0	2,381	100.0	100.0	12	100.0	100.0	1,553	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.7	0	0.0	4.6	2	20.0	8.2	108	17.6	5.7	20.9
Moderate	0	0.0	16.2	0	0.0	11.0	1	10.0	17.3	60	9.8	11.3	16.9
Middle	3	50.0	22.4	49	10.7	17.1	3	30.0	27.6	195	31.8	25.8	20.5
Upper	3	50.0	53.3	408	89.3	66.3	4	40.0	46.4	250	40.8	56.8	41.7
Unknown	0	0.0	1.4	0	0.0	1.0	0	0.0	0.5	0	0.0	0.3	0.0
Total	6	100.0	100.0	457	100.0	100.0	10	100.0	100.0	613	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.9	0	0.0	3.6	3	8.1	5.8	531	9.6	3.0	20.9
Moderate	5	15.6	17.5	493	9.7	12.1	5	13.5	14.9	496	9.0	9.3	16.9
Middle	7	21.9	24.3	440	8.6	21.3	7	18.9	24.4	586	10.6	20.7	20.5
Upper	20	62.5	40.6	4,159	81.7	52.8	21	56.8	41.4	3,725	67.4	53.5	41.7
Unknown	0	0.0	10.8	0	0.0	10.3	1	2.7	13.6	185	3.3	13.6	0.0
Total	32	100.0	100.0	5,092	100.0	100.0	37	100.0	100.0	5,523	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	4.5	0	0.0	1.8	0	0.0	6.9	0	0.0	3.0	20.9
Moderate	1	11.1	17.3	200	8.6	10.3	2	22.2	19.4	308	17.3	11.8	16.9
Middle	2	22.2	23.0	221	9.5	18.0	0	0.0	20.5	0	0.0	16.5	20.5
Upper	6	66.7	44.3	1,900	81.9	60.2	7	77.8	39.9	1,468	82.7	56.9	41.7
Unknown	0	0.0	10.9	0	0.0	9.7	0	0.0	13.3	0	0.0	11.8	0.0
Total	9	100.0	100.0	2,321	100.0	100.0	9	100.0	100.0	1,776	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.5	0	0.0	0.9	0	0.0	3.7	0	0.0	1.7	20.9
Moderate	3	13.0	9.2	238	5.7	5.5	3	15.0	14.6	552	12.9	8.7	16.9
Middle	3	13.0	23.9	407	9.8	17.8	1	5.0	21.6	190	4.4	16.2	20.5
Upper	16	69.6	52.3	3,267	78.5	58.5	15	75.0	48.6	3,298	76.9	60.2	41.7
Unknown	1	4.3	12.1	250	6.0	17.2	1	5.0	11.6	250	5.8	13.2	0.0
Total	23	100.0	100.0	4,162	100.0	100.0	20	100.0	100.0	4,290	100.0	100.0	100.0
Home Improvement Loans													
Low	1	50.0	7.2	105	73.4	4.4	0	0.0	5.6	0	0.0	2.9	20.9
Moderate	0	0.0	19.2	0	0.0	14.3	0	0.0	6.7	0	0.0	5.0	16.9
Middle	0	0.0	25.7	0	0.0	23.2	0	0.0	21.0	0	0.0	18.3	20.5
Upper	1	50.0	45.5	38	26.6	55.9	2	100.0	63.6	475	100.0	71.9	41.7
Unknown	0	0.0	2.4	0	0.0	2.2	0	0.0	3.1	0	0.0	2.0	0.0
Total	2	100.0	100.0	143	100.0	100.0	2	100.0	100.0	475	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	2.9	3.6	105	1.6	1.5	0	0.0	5.3	0	0.0	2.4	20.9
Moderate	4	11.8	13.6	438	6.6	8.3	5	16.1	16.6	860	13.1	10.2	16.9
Middle	5	14.7	22.6	628	9.5	17.5	1	3.2	20.7	190	2.9	16.0	20.5
Upper	23	67.6	45.3	5,205	78.6	57.9	24	77.4	44.5	5,241	80.1	58.6	41.7
Unknown	1	2.9	14.8	250	3.8	14.8	1	3.2	12.8	250	3.8	12.8	0.0
Total	34	100.0	100.0	6,626	100.0	100.0	31	100.0	100.0	6,541	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2016 and 2017 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 45060 (Syracuse, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2016						2017						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	\$%	\$(000)	\$%	\$%	#	%	\$%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	8.6	0	0.0	5.4	0	0.0	6.2	0	0.0	3.6	20.0
Moderate	0	0.0	24.3	0	0.0	18.7	0	0.0	25.2	0	0.0	19.9	19.9
Middle	0	0.0	26.9	0	0.0	27.9	0	0.0	24.0	0	0.0	24.7	23.0
Upper	1	100.0	24.8	160	100.0	34.5	0	0.0	26.9	0	0.0	34.8	37.1
Unknown	0	0.0	15.4	0	0.0	13.5	0	0.0	17.6	0	0.0	17.0	0.0
Total	1	100.0	100.0	160	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	7.6	0	0.0	4.2	0	0.0	9.6	0	0.0	6.4	20.0
Moderate	0	0.0	18.6	0	0.0	12.2	1	100.0	19.7	25	100.0	16.2	19.9
Middle	0	0.0	29.7	0	0.0	24.9	0	0.0	31.6	0	0.0	30.1	23.0
Upper	0	0.0	32.1	0	0.0	41.8	0	0.0	27.6	0	0.0	34.3	37.1
Unknown	0	0.0	12.1	0	0.0	16.9	0	0.0	11.4	0	0.0	13.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	25	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	14.7	0	0.0	4.6	1	33.3	13.3	20	71.4	5.4	20.0
Moderate	0	0.0	23.9	0	0.0	12.5	1	33.3	24.1	5	17.9	12.8	19.9
Middle	0	0.0	25.0	0	0.0	24.6	1	33.3	24.1	3	10.7	18.2	23.0
Upper	1	100.0	34.2	8	100.0	53.3	0	0.0	36.7	0	0.0	59.0	37.1
Unknown	0	0.0	2.2	0	0.0	5.0	0	0.0	1.9	0	0.0	4.5	0.0
Total	1	100.0	100.0	8	100.0	100.0	3	100.0	100.0	28	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	9.3	0	0.0	5.1	1	25.0	8.2	20	37.7	4.4	20.0
Moderate	0	0.0	22.7	0	0.0	16.7	2	50.0	23.7	30	56.6	18.6	19.9
Middle	0	0.0	27.3	0	0.0	26.9	1	25.0	25.8	3	5.7	25.6	23.0
Upper	2	100.0	28.3	168	100.0	37.3	0	0.0	28.7	0	0.0	36.0	37.1
Unknown	0	0.0	12.3	0	0.0	14.1	0	0.0	13.6	0	0.0	15.4	0.0
Total	2	100.0	100.0	168	100.0	100.0	4	100.0	100.0	53	100.0	100.0	100.0
Source: 2017 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 45060 (Syracuse, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %	
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans													
Low	0	0.0	9.1	0	0.0	5.4	0	0.0	11.6	0	0.0	6.5	20.0
Moderate	0	0.0	27.1	0	0.0	22.3	0	0.0	28.7	0	0.0	22.9	19.9
Middle	0	0.0	24.1	0	0.0	23.4	0	0.0	18.0	0	0.0	18.4	23.0
Upper	2	66.7	28.5	393	82.4	37.8	1	100.0	27.8	304	100.0	39.1	37.1
Unknown	1	33.3	11.2	84	17.6	11.1	0	0.0	13.8	0	0.0	13.1	0.0
Total	3	100.0	100.0	477	100.0	100.0	1	100.0	100.0	304	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	11.9	0	0.0	9.0	0	0.0	13.5	0	0.0	8.9	20.0
Moderate	0	0.0	19.5	0	0.0	14.0	1	100.0	20.8	35	100.0	16.1	19.9
Middle	0	0.0	24.2	0	0.0	22.4	0	0.0	28.6	0	0.0	25.6	23.0
Upper	0	0.0	37.2	0	0.0	46.6	0	0.0	29.7	0	0.0	39.3	37.1
Unknown	0	0.0	7.2	0	0.0	8.0	0	0.0	7.3	0	0.0	10.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	35	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	10.1	0	0.0	8.6	0	0.0	10.6	0	0.0	8.0	20.0
Moderate	0	0.0	16.5	0	0.0	10.1	0	0.0	22.3	0	0.0	18.5	19.9
Middle	0	0.0	35.4	0	0.0	34.4	0	0.0	29.8	0	0.0	36.9	23.0
Upper	0	0.0	38.0	0	0.0	46.8	0	0.0	35.1	0	0.0	35.8	37.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.1	0	0.0	0.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	9.8	0	0.0	6.3	0	0.0	12.0	0	0.0	7.3	20.0
Moderate	0	0.0	24.0	0	0.0	19.6	1	50.0	24.8	35	10.3	20.5	19.9
Middle	0	0.0	24.3	0	0.0	23.1	0	0.0	21.8	0	0.0	20.4	23.0
Upper	2	66.7	31.5	393	82.4	39.9	1	50.0	28.5	304	89.7	38.1	37.1
Unknown	1	33.3	10.5	84	17.6	11.0	0	0.0	13.0	0	0.0	13.7	0.0
Total	3	100.0	100.0	477	100.0	100.0	2	100.0	100.0	339	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 45060 (Syracuse, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	\$(000)	%	\$(000)	%	#	%	\$(000)	%	\$(000)	%	
Home Purchase Loans													
Low	0	0.0	9.0	0	0.0	4.8	0	0.0	10.5	0	0.0	6.6	20.0
Moderate	0	0.0	24.6	0	0.0	19.2	0	0.0	25.7	0	0.0	21.8	19.9
Middle	0	0.0	26.8	0	0.0	27.6	0	0.0	21.0	0	0.0	20.8	23.0
Upper	0	0.0	26.7	0	0.0	36.5	1	100.0	24.0	250	100.0	33.7	37.1
Unknown	0	0.0	12.9	0	0.0	11.8	0	0.0	18.8	0	0.0	17.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	250	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.8	0	0.0	2.9	0	0.0	9.9	0	0.0	5.7	20.0
Moderate	0	0.0	16.1	0	0.0	10.6	0	0.0	19.3	0	0.0	14.4	19.9
Middle	0	0.0	25.2	0	0.0	20.9	1	33.3	24.1	100	22.5	21.5	23.0
Upper	0	0.0	45.8	0	0.0	56.0	2	66.7	32.0	345	77.5	42.3	37.1
Unknown	0	0.0	7.1	0	0.0	9.6	0	0.0	14.8	0	0.0	16.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	445	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	12.9	0	0.0	12.5	0	0.0	10.4	0	0.0	4.9	20.0
Moderate	0	0.0	24.7	0	0.0	14.9	0	0.0	24.0	0	0.0	18.3	19.9
Middle	0	0.0	23.5	0	0.0	14.9	0	0.0	22.9	0	0.0	20.7	23.0
Upper	1	100.0	37.6	20	100.0	56.0	0	0.0	39.6	0	0.0	53.2	37.1
Unknown	0	0.0	1.2	0	0.0	1.7	0	0.0	3.1	0	0.0	2.9	0.0
Total	1	100.0	100.0	20	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	7.5	0	0.0	4.2	0	0.0	9.8	0	0.0	6.0	20.0
Moderate	0	0.0	20.2	0	0.0	15.2	0	0.0	22.4	0	0.0	18.3	19.9
Middle	0	0.0	24.7	0	0.0	23.6	1	25.0	22.6	100	14.4	20.9	23.0
Upper	1	100.0	33.9	20	100.0	43.8	3	75.0	27.8	595	85.6	37.4	37.1
Unknown	0	0.0	13.7	0	0.0	13.2	0	0.0	17.4	0	0.0	17.5	0.0
Total	1	100.0	100.0	20	100.0	100.0	4	100.0	100.0	695	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2016 and 2017 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA (Lewis County)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2016						2017						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	7.1	0	0.0	4.2	0	0.0	9.3	0	0.0	5.5	22.4
Moderate	1	50.0	29.3	114	36.7	21.0	0	0.0	27.8	0	0.0	19.7	20.3
Middle	0	0.0	22.2	0	0.0	18.5	1	33.3	18.5	171	24.1	19.0	21.1
Upper	1	50.0	31.3	197	63.3	46.2	2	66.7	35.2	540	75.9	45.8	36.2
Unknown	0	0.0	10.1	0	0.0	10.2	0	0.0	9.3	0	0.0	10.0	0.0
Total	2	100.0	100.0	311	100.0	100.0	3	100.0	100.0	711	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	12.3	0	0.0	7.7	0	0.0	7.7	0	0.0	3.9	22.4
Moderate	0	0.0	19.3	0	0.0	14.9	1	100.0	20.0	38	100.0	19.7	20.3
Middle	2	100.0	21.1	293	100.0	22.4	0	0.0	30.8	0	0.0	26.2	21.1
Upper	0	0.0	35.1	0	0.0	39.7	0	0.0	36.9	0	0.0	45.6	36.2
Unknown	0	0.0	12.3	0	0.0	15.3	0	0.0	4.6	0	0.0	4.7	0.0
Total	2	100.0	100.0	293	100.0	100.0	1	100.0	100.0	38	100.0	100.0	100.0
Home Improvement Loans													
Low	1	25.0	14.3	10	10.0	5.8	0	0.0	8.3	0	0.0	2.8	22.4
Moderate	0	0.0	20.6	0	0.0	19.4	0	0.0	33.3	0	0.0	32.8	20.3
Middle	3	75.0	36.5	90	90.0	33.3	2	50.0	31.9	36	27.7	22.9	21.1
Upper	0	0.0	28.6	0	0.0	41.5	1	25.0	23.6	85	65.4	40.5	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	1	25.0	2.8	9	6.9	1.1	0.0
Total	4	100.0	100.0	100	100.0	100.0	4	100.0	100.0	130	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	12.5	10.5	10	1.4	5.4	0	0.0	8.6	0	0.0	4.8	22.4
Moderate	1	12.5	24.2	114	16.2	18.9	1	12.5	27.3	38	4.3	20.7	20.3
Middle	5	62.5	26.0	383	54.4	20.7	3	37.5	25.7	207	23.5	21.4	21.1
Upper	1	12.5	31.5	197	28.0	43.8	3	37.5	32.2	625	71.1	45.3	36.2
Unknown	0	0.0	7.8	0	0.0	11.2	1	12.5	6.1	9	1.0	7.7	0.0
Total	8	100.0	100.0	704	100.0	100.0	8	100.0	100.0	879	100.0	100.0	100.0
Source: 2017 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA (Lewis County)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	4.6	0	0.0	3.7	0	0.0	7.7	0	0.0	4.7	22.4
Moderate	0	0.0	28.7	0	0.0	20.9	0	0.0	25.3	0	0.0	19.1	20.3
Middle	0	0.0	29.9	0	0.0	29.0	0	0.0	28.6	0	0.0	28.6	21.1
Upper	1	100.0	34.5	68	100.0	44.9	1	100.0	30.8	286	100.0	40.7	36.2
Unknown	0	0.0	2.3	0	0.0	1.5	0	0.0	7.7	0	0.0	7.0	0.0
Total	1	100.0	100.0	68	100.0	100.0	1	100.0	100.0	286	100.0	100.0	100.0
Refinance Loans													
Low	2	66.7	15.1	95	68.3	10.8	0	0.0	9.4	0	0.0	4.8	22.4
Moderate	0	0.0	24.5	0	0.0	25.1	0	0.0	18.8	0	0.0	21.5	20.3
Middle	0	0.0	32.1	0	0.0	28.5	0	0.0	29.7	0	0.0	26.2	21.1
Upper	1	33.3	28.3	44	31.7	35.6	2	100.0	40.6	256	100.0	44.8	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.6	0	0.0	2.7	0.0
Total	3	100.0	100.0	139	100.0	100.0	2	100.0	100.0	256	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	1	100.0	15.4	53	100.0	15.1	22.4
Moderate	0	0.0	26.7	0	0.0	10.6	0	0.0	11.5	0	0.0	3.9	20.3
Middle	0	0.0	33.3	0	0.0	35.3	0	0.0	19.2	0	0.0	14.1	21.1
Upper	0	0.0	40.0	0	0.0	54.1	0	0.0	53.8	0	0.0	66.8	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	53	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	50.0	6.7	95	45.9	4.8	1	25.0	9.3	53	8.9	5.3	22.4
Moderate	0	0.0	25.1	0	0.0	20.2	0	0.0	21.1	0	0.0	18.3	20.3
Middle	0	0.0	31.8	0	0.0	29.0	0	0.0	27.5	0	0.0	26.9	21.1
Upper	2	50.0	33.5	112	54.1	43.5	3	75.0	37.7	542	91.1	44.3	36.2
Unknown	0	0.0	2.8	0	0.0	2.5	0	0.0	4.4	0	0.0	5.1	0.0
Total	4	100.0	100.0	207	100.0	100.0	4	100.0	100.0	595	100.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA (Lewis County)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	\$%	\$(000)	\$%	\$%	#	%	\$%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	8.7	0	0.0	5.8	0	0.0	4.3	0	0.0	1.9	22.4
Moderate	0	0.0	29.1	0	0.0	24.1	0	0.0	24.8	0	0.0	15.9	20.3
Middle	0	0.0	19.4	0	0.0	16.8	0	0.0	23.9	0	0.0	22.6	21.1
Upper	1	100.0	40.8	100	100.0	50.5	2	100.0	40.2	612	100.0	52.7	36.2
Unknown	0	0.0	1.9	0	0.0	2.9	0	0.0	6.8	0	0.0	6.9	0.0
Total	1	100.0	100.0	100	100.0	100.0	2	100.0	100.0	612	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.7	0	0.0	1.8	1	50.0	7.9	26	36.6	4.4	22.4
Moderate	0	0.0	17.4	0	0.0	13.0	0	0.0	15.8	0	0.0	11.0	20.3
Middle	2	100.0	26.7	354	100.0	23.9	1	50.0	28.7	45	63.4	21.2	21.1
Upper	0	0.0	46.5	0	0.0	55.9	0	0.0	40.6	0	0.0	54.0	36.2
Unknown	0	0.0	4.7	0	0.0	5.5	0	0.0	6.9	0	0.0	9.3	0.0
Total	2	100.0	100.0	354	100.0	100.0	2	100.0	100.0	71	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	10.3	0	0.0	3.5	0	0.0	9.5	0	0.0	6.6	22.4
Moderate	0	0.0	24.1	0	0.0	8.6	0	0.0	33.3	0	0.0	31.5	20.3
Middle	1	100.0	17.2	30	100.0	11.1	0	0.0	19.0	0	0.0	18.6	21.1
Upper	0	0.0	48.3	0	0.0	76.8	2	100.0	38.1	160	100.0	43.3	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	30	100.0	100.0	2	100.0	100.0	160	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.9	0	0.0	3.7	1	16.7	6.3	26	3.1	3.4	22.4
Moderate	0	0.0	24.0	0	0.0	17.5	0	0.0	21.7	0	0.0	14.9	20.3
Middle	3	75.0	21.9	384	79.3	18.9	1	16.7	24.5	45	5.3	21.0	21.1
Upper	1	25.0	41.6	100	20.7	53.7	4	66.7	41.1	772	91.6	53.3	36.2
Unknown	0	0.0	5.6	0	0.0	6.3	0	0.0	6.3	0	0.0	7.4	0.0
Total	4	100.0	100.0	484	100.0	100.0	6	100.0	100.0	843	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Small Business Lending by Income Level of Geography

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 46540 (Utica-Rome, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	10	12.0	11.0	4,028	16.9	11.8	11.9
Moderate	7	8.4	11.1	7,142	30.0	14.7	13.9
Middle	35	42.2	47.6	5,897	24.8	39.5	45.6
Upper	24	28.9	28.8	5,466	23.0	28.8	27.3
Unknown	7	8.4	1.1	1,255	5.3	5.0	1.3
Tract-Unk	0	0.0	0.3	0	0.0	0.1	
Total	83	100.0	100.0	23,789	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	2.8	0	0.0	3.6	3.8
Moderate	0	0.0	10.8	0	0.0	14.3	11.1
Middle	3	42.9	57.9	287	19.5	60.7	60.1
Upper	4	57.1	28.4	1,183	80.4	21.5	24.5
Unknown	0	0.0	0.1	0	0.0	0.0	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,471	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 45060 (Syracuse, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	14.6	0	0.0	18.2	2.5
Middle	0	0.0	73.5	0	0.0	65.5	97.5
Upper	0	0.0	11.8	0	0.0	16.3	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA (Lewis County)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	22.0	0	0.0	22.9	12.9
Middle	0	0.0	78.0	0	0.0	77.1	87.1
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending by Borrower Income Level

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 46540 (Utica-Rome, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	44	53.0	44.8	9,655	40.6	26.1	89.5
Over \$1 Million	29	34.9		11,086	46.6		8.8
Revenue Unknown	9	10.8		547	2.3		1.7
Total	83	100.0		23,789	100.0		100.0
By Loan Size							
\$100,000 or Less	40	48.2	91.9	2,356	9.9	36.4	
\$100,001 - \$250,000	20	24.1	4.9	3,358	14.1	21.1	
\$250,001 - \$1 Million	21	25.3	3.2	10,602	44.6	42.5	
Total	83	100.0	100.0	23,789	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	21	47.7		1,198	12.4		
\$100,001 - \$250,000	11	25.0		1,838	19.0		
\$250,001 - \$1 Million	12	27.3		6,619	68.6		
Total	44	100.0		9,655	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	4	57.1	41.2	1,305	88.7	23.2	89.7
Over \$1 Million	1	14.3		150	10.2		8.1
Revenue Unknown	2	28.6		16	1.1		2.2
Total	7	100.0		1,471	100.0		100.0
By Loan Size							
\$100,000 or Less	3	42.9	92.2	89	6.1	37.9	
\$100,001 - \$250,000	2	28.6	4.2	286	19.4	17.0	
\$250,001 - \$1 Million	2	28.6	3.6	1,096	74.5	45.1	
Total	7	100.0	100.0	1,471	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	1	25.0		73	5.6		
\$100,001 - \$250,000	1	25.0		136	10.4		
\$250,001 - \$1 Million	2	50.0		1,096	84.0		
Total	4	100.0		1,305	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 45060 (Syracuse, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	0	0.0	40.7	0	0.0	23.4	72.5
Over \$1 Million	0	0.0		0	0.0		20.0
Revenue Unknown	0	0.0		0	0.0		7.5
Total	0	0.0		0	0.0		100.0
By Loan Size							
\$100,000 or Less	0	0.0	92.8	0	0.0	44.7	
\$100,001 - \$250,000	0	0.0	5.2	0	0.0	26.0	
\$250,001 - \$1 Million	0	0.0	2.0	0	0.0	29.3	
Total	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	0	0.0		0	0.0		

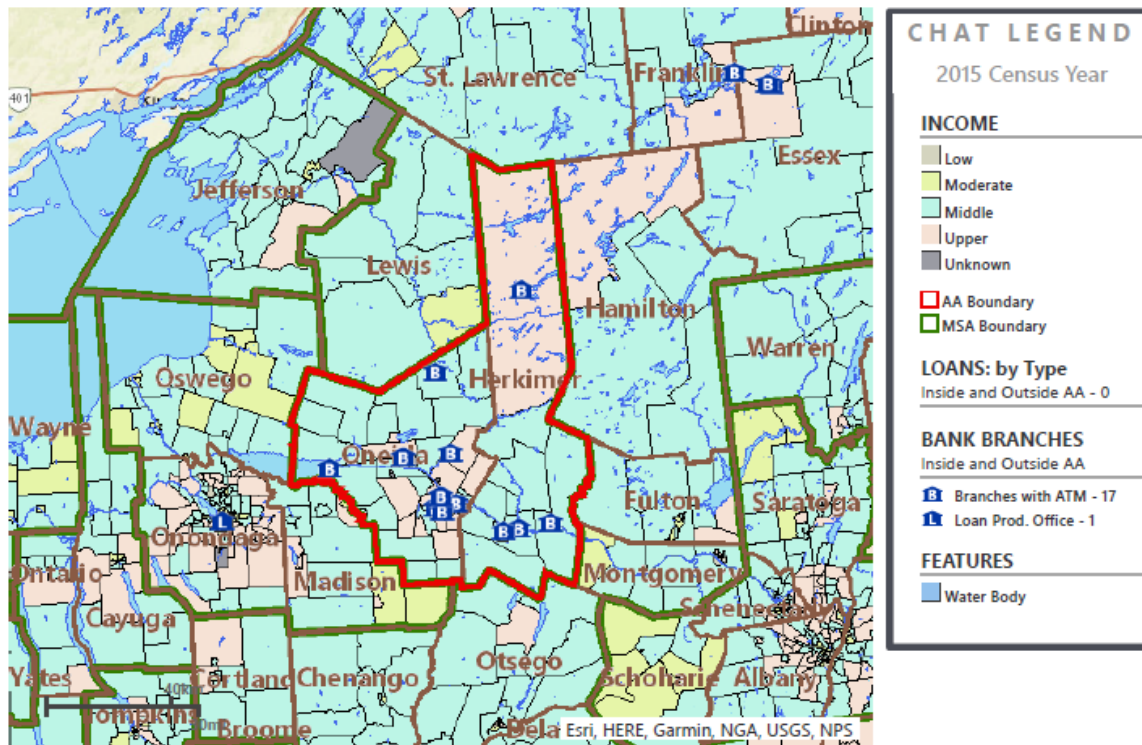
Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA (Lewis County)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	0	0.0	44.0	0	0.0	39.3	91.4
Over \$1 Million	0	0.0		0	0.0		3.6
Revenue Unknown	0	0.0		0	0.0		5.0
Total	0	0.0		0	0.0		100.0
By Loan Size							
\$100,000 or Less	0	0.0	95.3	0	0.0	63.2	
\$100,001 - \$250,000	0	0.0	4.0	0	0.0	26.3	
\$250,001 - \$1 Million	0	0.0	0.7	0	0.0	10.4	
Total	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	0	0.0		0	0.0		

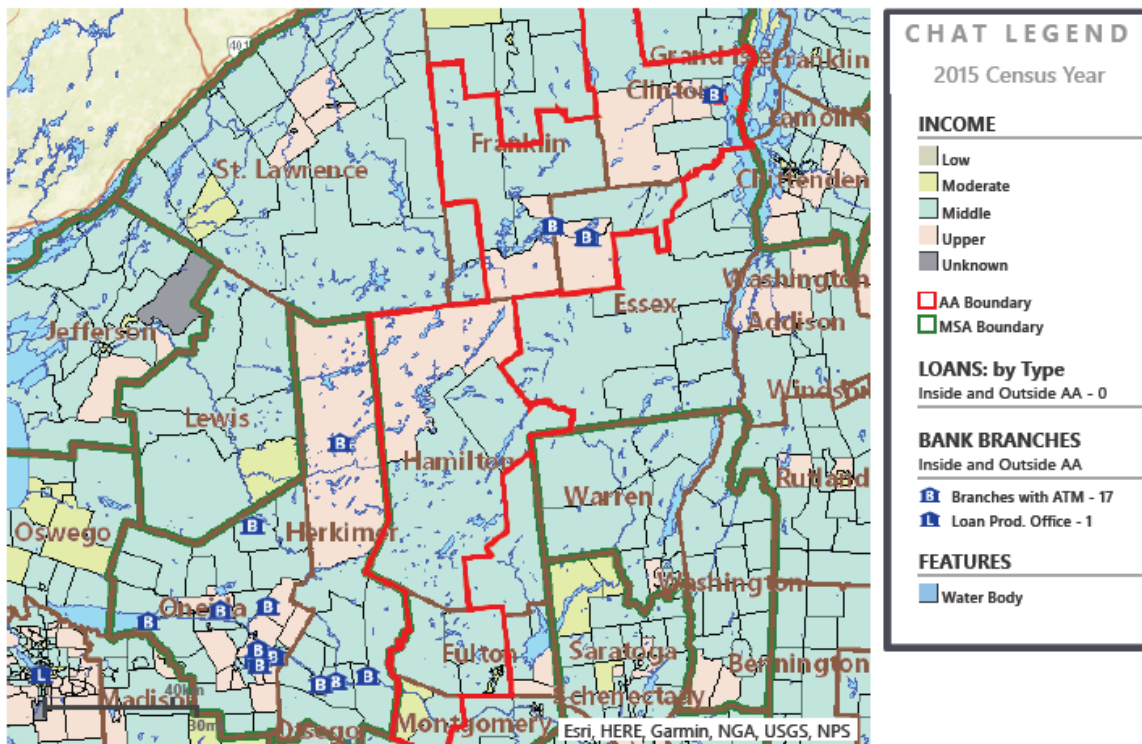
Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

**CRA APPENDIX B
 ASSESSMENT AREA MAPS**

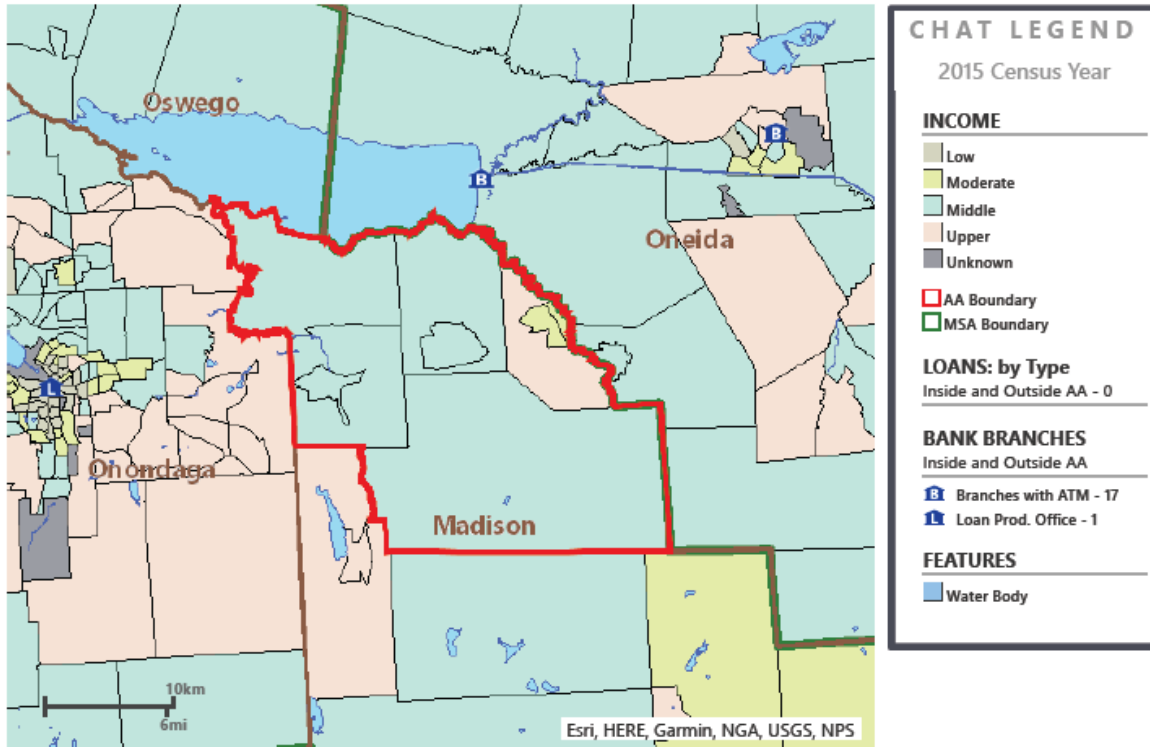
MSA 46540 (Utica-Rome, NY) Assessment Area 2016-2021



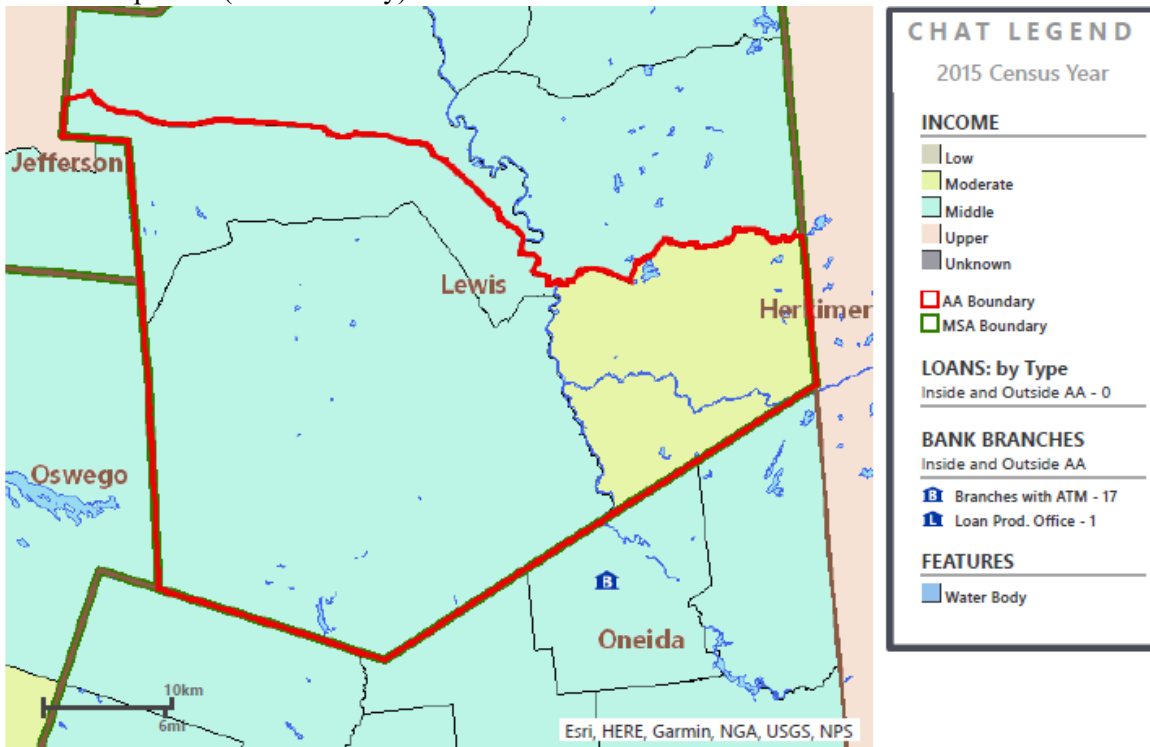
Non-Metropolitan Assessment Area 2016-2021



MSA 45060 (Syracuse, NY) Assessment Area 2016-2021



Non-Metropolitan (Lewis County) Assessment Area 2016-2021



CRA APPENDIX C GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time they are established, census tracts generally contain between 1,000 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. However, they may follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county (or statistically equivalent entity) is always a census tract boundary.

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

1. Low-or moderate-income geographies;
2. Designated disaster areas; or
3. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Distressed or Underserved Non-Metropolitan Middle-Income Area: A middle-income, nonmetropolitan geography that is distressed due to economic factors, such as unemployment levels, poverty, or population loss, or is underserved based on population size, density, and dispersion.

Family: A family is a group of two or more people related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters.

Limited-scope review: Performance is analyzed using only quantitative factors.

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during the CRA evaluation. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

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

Small loan(s) to business(es): A loan included in 'loan to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial 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.

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