

PUBLIC DISCLOSURE

October 31, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Alden State Bank
RSSD No. 414102

13216 Broadway
Alden, New York 14004

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.

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INSTITUTION'S CRA RATING: This institution is rated Satisfactory.
The Lending Test is rated: Satisfactory.
The Community Development Test is rated: Satisfactory.

The major factors supporting the satisfactory performance rating for Alden State Bank (“Alden” 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 activity were made in the 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 areas; and
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank’s community development performance demonstrated adequate responsiveness to the 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 for community development in the bank’s assessment areas.

SCOPE OF EXAMINATION

Procedures

Alden’s performance was evaluated using the Federal Financial Institutions Examination Council’s (“FFIEC”) Interagency Intermediate Small Institution Examination Procedures. The prior CRA evaluation was under the Small Institution CRA Examination Procedures, at which time the bank did not submit any community development activities for examiner consideration. During the current examination review period, the bank exceeded the Small Bank asset-size threshold, requiring the current CRA examination (all years) to be subject to the 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. Home purchase, refinance, and home improvement loans reported under the Home Mortgage Disclosure Act (“HMDA”) were analyzed. The bank is not a CRA Small Business reporter but small business loans originated from January 1, 2021 through December 31, 2021 were analyzed.

As shown in the subsequent table, the lending test evaluation covered the period from January 1,

2015 to December 31, 2021. The evaluation period for Alden’s community development activities was from January 26, 2016 through October 31, 2022.

PERFORMANCE CRITERIA	EVALUATION PERIOD
Loan-to-Deposit Ratio	January 1, 2015 – December 31, 2021
Lending in Assessment Areas	January 1, 2015 – December 31, 2021
Geographic Distribution of Loans	January 1, 2015 – December 31, 2021
Borrower Distribution of Loans	January 1, 2015 – December 31, 2021
Response to CRA Complaints	January 1, 2015 – December 31, 2021
Community Development Lending	January 26, 2016 – October 31, 2022
Qualified Investments	January 26, 2016 – October 31, 2022
Community Development Services	January 26, 2016 – October 31, 2022

Products

Retail loan products evaluated included home purchase, refinance, and home improvement loans reported under HMDA. Examiners verified the integrity of the bank’s 2015, 2016, 2017, 2018, 2019, 2020 and 2021 HMDA loan data and selected a sample of 2021 small business loan data for verification purposes. Multifamily loans were excluded from the evaluation as the volume was too insignificant for 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 and deposits.

Lending Distribution Analysis

The geographic and borrower loan distribution analyses were based on loan activity made in Alden’s assessment areas. To evaluate the geographic distribution of loans, the proportion of home purchase, refinance, and home improvement loan originations located in low- and moderate-income (“LMI”) geographies was compared to the proportion of owner-occupied housing units located in LMI geographies of the assessment areas. For small business loans, Alden’s proportion of loans to businesses with gross annual revenues (“GAR”) of \$1 million or less were compared to the proportion of all such businesses as reported by Dun & Bradstreet (“D&B”). The size of small business loans was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

To analyze the distribution of home purchase, refinance, and home improvement lending by borrower profile, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the assessment areas. Median family income (“MFI”) estimates from the FFIEC were used to categorize borrower income. For small business lending, Alden’s proportion of loans to businesses with GAR of \$1 million or less, based on D&B data, were compared to the proportion of all such businesses located in the assessment areas. The size of the

small business loans was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

Alden'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 Alden within their assessment areas. Alden's loan-to-deposit ratio was also compared to its national peer group. Alden's performance in making community development loans and qualified investments was also compared with peer banks in Alden's assessment areas.

Community Contacts

In order to learn more about community credit needs, examiners conducted interviews with two non-profit organizations addressing community services and economic development needs. A community contact whose organization supports economic self-sufficiency through entrepreneurial training, technical assistance, access to financing for new and expanding businesses, and mortgage products for underserved borrowers, shared that the area needs access to affordable low-dollar loans. Another community contact from a social services agency for area families in need shared that one of the greatest needs was developing a skilled workforce through both workshops and on-the-job training. The community contact also noted that the existing affordable housing in the community is very old and often subjected to deferred maintenance.

DESCRIPTION OF INSTITUTION

Alden is a full-service intrastate bank offering a variety of consumer and commercial loan products and deposit products. Loan products include residential and commercial mortgages, home improvement loans, home equity loans, installment loans, and consumer loans. Deposit products include checking, savings, and money market accounts.

Founded in 1916 and headquartered in Alden, New York, Alden operates three full-service branches, each located in Erie County, New York. Based on deposits reported to the Federal Deposit Insurance Corporation ("FDIC"), on June 30, 2022, Alden ranked 11th in deposit market share (0.6%) in the aggregate of counties in which Alden's assessment areas were located. The bank's assessment areas include 18 banks, primarily dominated by large financial institutions, such as M&T Bank and KeyBank. Together, M&T Bank and KeyBank maintains 72.2% of the deposit market share as of June 30, 2022.

As of June 30, 2022, Alden maintains total assets of \$443.5 million, total loans and leases of \$297.1 million, and total deposits of \$389.1 million. Of the total gross loans and leases, 54.9% were secured by one- to four-family residential real estate. Based on the June 30, 2022 Call Report, Alden's loan portfolio by dollar volume is summarized in the subsequent table:

Loan Type	Total Loans	Percent of Total Loans
1-4 Residential Real Estate Secured	\$163,177,000	54.9%
Construction	\$22,930,000	7.7%
Multifamily Dwelling	\$19,362,000	6.5%
HELOCs	\$0	0.0%
Consumer	\$3,639,000	1.2%
Agriculture	\$98,000	0.1%
Commercial & Industrial	\$36,442,000	12.2%
Nonfarm Nonresidential Secured	\$51,251,000	17.2%
Other	\$120,000	0.1%
Total	\$297,019,000	100.00%
Source: Call Report as of June 30, 2022.		

Based on the June 30, 2022 Uniform Bank Performance Report (UBPR), Alden’s deposit portfolio by dollar volume was a mix of Demand Deposits, Money Market Deposits, and other Savings Deposits as summarized in the subsequent table:

Deposit Type	Total Deposits	Percent of Total Deposits
Demand Deposits	\$114,712,000	29.5%
All NOW and ATS Accounts	\$34,711,000	8.9%
Money Market Deposit Accounts	\$67,470,000	17.3%
Other Savings Deposits	\$119,108,000	30.6%
Time Deposits at or below Insurance Limit	\$36,469,000	9.4%
Time Deposits Above Insurance Limit	\$16,584,000	4.3%
Brokered Deposits	\$0	0.0%
Total	\$389,054,000	100.0%
Source: Uniform Bank Performance Report as of June 30, 2022.		

Alden’s previous CRA evaluation was conducted as of January 26, 2016 using the FFIEC Interagency Small Institution CRA Examination Procedures, at which time the bank did not submit any community developments activities for review. The prior evaluation resulted in an overall rating of Satisfactory. There were no financial or legal factors to prevent Alden from fulfilling its responsibility under CRA.

DESCRIPTION OF ASSESSMENT AREAS

Alden maintained two assessment areas in western New York State. The assessment areas consisted of the following:

Full Scope Assessment Area

Alden's first assessment area is located in Metropolitan Statistical Area ("MSA") 15380 (Buffalo-Cheektowaga, NY). In 2015, 2016, 2017, 2018, and 2019, the bank's MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area was comprised of Erie County. MSA 15380 also contained one other county, Niagara County, which was excluded from this assessment area. In 2019, while the bank did not change its assessment area, adjustments were made to MSAs by the Office of Management and Budget ("OMB") that resulted in the name change of MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) to MSA 15380 (Buffalo-Cheektowaga, NY). The composition of the MSA did not change. In 2020, Alden expanded this assessment area by adding Niagara County. Therefore, in 2020 and 2021, this assessment area was comprised of Erie and Niagara Counties, the entirety of MSA 15380.

MSA 15380 (Buffalo-Cheektowaga, NY) was evaluated as a full scope assessment area based on the significance of the bank's lending and deposit activities as compared to the bank's other assessment area. The MSA 15380 (Buffalo-Cheektowaga, NY) assessment area contained 100% of the branch locations and 78.9% of the combined HMDA loans.

In 2015 and 2016, according to the 2010 ACS, this assessment area contained 237 census tracts, of which 30 (12.7%) were low-income, 47 (19.8%) were moderate-income, 93 (39.2%) were middle-income, 61 (25.7%) were upper-income, and 6 (2.5%) were unknown-income. In 2017, 2018, and 2019, while this assessment area still had a of total 237 census tracts, 38 (16.0%) were low-income, 41 (17.3%) were moderate-income, 90 (38.0%) were middle-income, 60 (25.3%) were upper-income, and 8 (3.4%) were unknown-income. In 2020 and 2021, the expanded assessment area contained 299 census tracts, of which 46 (15.4%) were low-income, 54 (18.1%) were moderate-income, 119 (39.8%) were middle-income, 70 (23.4%) were upper-income, and 10 (3.3%) were unknown-income.

Limited Scope Assessment Area

Alden's second assessment is located in a Non-Metropolitan area and contained the entirety of Genesee and Wyoming Counties, NY. This assessment area remained unchanged throughout the review period. Alden's Non-Metropolitan (Genesee and Wyoming Counties, NY) assessment area was subject to a limited scope review as this assessment area did not have a substantial effect on the overall rating due to the relatively low level of lending activity and having no branches.

According to the 2010 ACS, in 2015 and 2016, this assessment area contained 26 census tracts, of which none were low-income, 3 (11.5%) were moderate-income, 18 (69.2%) were middle-income, 5 (19.2%) were upper-income, and none were unknown-income. In 2017, 2018, 2019, 2020, and 2021, while this assessment area still had a of total 26 census tracts, none were low-income, 1 (3.8%) was moderate-income, 23 (88.5%) were middle-income, 2 (7.7%) were upper-income, and none were unknown-income.

Alden'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 A.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Alden's record of meeting the credit needs of its assessment areas through its lending performance is rated Satisfactory. Alden'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 geographic distribution of loans reflected reasonable dispersion throughout the assessment areas. The overall distribution of loans to borrowers reflected a reasonable penetration among individuals of different income levels and businesses of different sizes was also reasonable. Alden received no CRA-related complaints since the previous evaluation.

Loan-to-Deposit Ratio

Alden's loan-to-deposit ratio was reasonable given the bank's size, financial condition, and the assessment area credit needs. Alden's average loan-to-deposit ratio for the 28 quarters between January 1, 2015 and December 31, 2021 was 82.1%, based on information contained in its Consolidated Report of Condition and Income. This ratio was above the national peer average of 80.6% and above an average of 75.3% for five similarly situated banks with branches located in Alden's assessment areas during the evaluation period. Alden's average loan-to-deposit ratio increased from the prior CRA evaluation period when the bank had an average loan-to-deposit ratio of 75.0%.

Lending in Assessment Areas

Alden originated a substantial majority of its loans and other lending-related activities in its assessment areas.

2015 through 2017:

The bank's HMDA lending activity from 2015 through 2017 was located primarily within the AAs. During this period, Alden originated 93.7% of its HMDA loans within the AAs by number and 91.3% by dollar volume. This was comparable to 95.4% by number and 93.5% by dollar volume at Alden's previous CRA examination. The subsequent chart provides additional details:

2015-2017 Lending Inside and Outside the Assessment Areas								
Loan Types	Inside				Outside			
	#	%	\$(,000)	%	#	%	\$(,000)	%
Home Improvement	422	96.6	\$17,214	96.5	15	3.4	\$626	3.5
Home Purchase	265	86.9	\$42,442	84.8	40	13.1	\$7,610	15.2
Multi-Family Housing	8	88.9	\$5,820	96.7	1	11.1	\$200	3.3
Refinancing	229	97.4	\$28,914	98.2	6	2.6	\$522	1.8
Total HMDA Loans	924	93.7	\$94,390	91.3	62	6.3	\$8,958	8.7

2018 through 2021:

The bank's HMDA lending activity from 2018 through 2021 was located primarily within the AAs. During this period, Alden originated 92.8% of its HMDA loans within the AAs by number and 93.5% by dollar volume. In 2021, Alden originated 90.8% of its small business loans by number and 89.7% by dollar volume within its respective AAs. The subsequent chart provides additional details:

2018-2021 Lending Inside and Outside the Assessment Areas								
Loan Types	Inside				Outside			
	#	%	\$(,000)	%	#	%	\$(,000)	%
Home Improvement	139	94.6	\$9,704	92.2	8	5.4	\$816	7.8
Home Purchase	380	88.0	\$67,257	89.3	52	12.0	\$8,037	11
Multi-Family Housing	42	97.7	\$29,629	99.3	1	2.3	\$221	0.7
Refinancing	514	95.9	\$66,348	95.8	22	4.1	\$2,916	4.2
Total HMDA Loans	1,075	92.8	\$172,938	93.5	83	7.2	\$11,990	6.5
Total Small Business (2021)	69	90.8	\$9,238	89.7	7	9.2	\$1,056	10.3

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

Alden's overall lending reflected reasonable penetration among individuals of different income (including LMI) levels and businesses and farms of different sizes in the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area. 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

Alden's overall geographic distribution of loans was reasonable based primarily on reasonable dispersion in the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

Alden’s performance under the community development test was Satisfactory. Alden demonstrated adequate responsiveness to the 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 for community development in the bank’s assessment areas. Compared to similarly situated peer institutions, Alden made an adequate level of CD loans and qualified investments.

Given that this was Alden’s first evaluation as an Intermediate Small Bank under the Intermediate Small Institution CRA Examination Procedures, a comparison to the prior evaluation’s community development loans and qualified investments was not conducted. When compared to five other institutions operating within the assessment area, Alden’s annualized community development loans ranked 6th out of 6 based on Tier 1 Capital, average assets, and deposits.

During the current evaluation period, Alden’s community development loans and qualified investments totaled \$10.0 million, of which nearly 95.7% were made within Alden’s assessment areas. Of the bank’s total qualified community development lending, 15 loans, totaling \$781,300, were originated pursuant to the Paycheck Protection Program (“PPP”), established by the Coronavirus Aid, Relief, and Economic Security Act (“CARES Act”) of 2020 and designed to provide direct capital for small businesses adversely affected by the COVID-19 pandemic to keep workers on small business payrolls.

See details in the subsequent community development loans and qualified investments table:

Summary of Community Development Loans and Qualified Investments January 26, 2016 to October 31, 2022						
Geography or Assessment Area	Loans		Investments		Total	
	#	(\$,000)	#	(\$,000)	#	(\$,000)
MSA 15380 (Buffalo-Cheektowaga, NY) AA	34	9,257	1	500	35	9,757
Non-Metropolitan (Genesee and Wyoming Co) AA	2	301	1	85	3	386
Broader Statewide/Regional Area	2	430	29	17,491	31	17,921
Total	38	9,988	31	18,076	69	28,064
<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 10/31/2022.</i>						

Alden’s community development program was responsive to community needs overall as identified by community contacts, which stated that affordable housing, economic development, and new jobs

were critical needs throughout Alden’s assessment areas. In terms of dollar amount, affordable housing represented the majority of total activity at 59.2%, economic development represented 29.9%, and revitalization and stabilization represented 10.8% of total activity. The subsequent chart details Alden’s community development loans and qualified investments by designation.

Summary of Community Development Loans and Qualified Investments By Primary Purpose Designation January 26, 2016 to October 31, 2022						
Designation	Loans		Investments		Total	
	#	(\$,000)	#	(\$,000)	#	(\$,000)
Affordable Housing	18	5,916	0	0	18	5,916
Community Services	0	0	25	15,703	25	15,703
Economic Development	4	2,991	1	700	5	3,691
Revitalize and Stabilize	16	1,081	5	1,673	21	2,754
Total	38	9,988	31	18,076	69	28,064

Alden provided 26 technical assistance activities and two financial literacy seminars. Six bank employees also served on boards or committees of 22 community development organizations.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Alden was in compliance with the substantive provisions of 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 15380 (Buffalo-Cheektowaga, NY)**

FULL REVIEW

DESCRIPTION OF OPERATIONS IN MSA 15380 (BUFFALO-CHEEKTOWAGA, NY)

Alden's banking activities within its assessment areas are primarily conducted within the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area. As of December 31, 2021, Alden operated its three branches in this assessment area. As of June 30, 2022, these branches generated \$389.1 million in deposits. Of the bank's 1,999 HMDA loans originated in the bank's combined assessment areas during the evaluation period, 1,578 (78.9%) were originated in the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area. Of the 69 small business loans originated in the bank's combined assessment areas, 64 (92.8%) were originated in the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area.

Alden's market area is competitive with branches of local and regional banks operating in the assessment area. With a deposit market share of 0.6%, Alden is the 9th largest depository institution in the MSA. Primary bank competitors in this assessment area include M&T Bank, KeyBank, and Bank of America.

PERFORMANCE CONTEXT

The following demographic and economic information will be used to describe this assessment area and to evaluate the context in which the bank operated. The information was obtained from publicly available sources, including the U.S. Department of Commerce's 2010 Census ("2010 Census"), 2011-2015 U.S. Census Bureau American Community Survey ("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"). Because the current review period occurred during both the 2010 Census and the 2015 ACS, coupled with the change in the bank's assessment area delineation, the demographic data below has been divided into three sections: 2015-2016, 2017-2019, and 2020-2021.

2015-2016 - MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)

In 2015 and 2016, the relevant performance context data for this assessment area was derived from the 2010 Census.

Demographic Characteristics

The MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area included Erie County. According to the 2010 Census, the population of this assessment area was 919,040. The assessment

area consisted of 237 census tracts, of which 30 or 12.7% were low-income, 47 or 19.8% were moderate-income, 93 or 39.2% were middle-income, 61 or 25.7% were upper-income, and 6 or 2.5% were of unknown-income.

Income Characteristics

Based on the 2010 Census data, the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area had 231,113 families, of which 21.6% were low-income (10.1% of which were below the poverty level), 17.1% were moderate-income, 20.3% were middle-income, and 41.0% were upper-income.

The FFIEC median family incomes for the counties comprising the MSA as of the 2010 Census were as follows:

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) 2015-2016 Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$69,044	\$67,607	-2.08%
Erie County, NY	\$69,044	\$67,607	-2.08%
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	\$68,092	\$67,108	-1.45%
New York State	\$73,401	\$71,913	-2.03%
<small>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.</small>			

Housing Characteristics

Based on the 2010 Census data, the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area had 420,432 housing units, of which 59.5% were owner-occupied, 30.4% were rental, and 10.1% were vacant. Of the total housing units, 12.6% were located in low-income census tracts, 20.0% in moderate-income census tracts, 36.0% in middle-income census tracts, 31.4% in upper-income census tracts, and 0% in unknown-income census tracts. In low-income census tracts, 25.1% of housing units were owner-occupied, 50.5% were rental units, and 24.4% were vacant. In moderate-income census tracts, 43.2% of housing units were owner-occupied, 41.3% were rental units, and 15.5% were vacant.

The median age of housing stock in the assessment area was 57 years old, with 43.8% of the stock built before 1950. The median age of housing stock was 61 years in low-income tracts and 61 years in moderate-income tracts. According to the 2010 Census, the median housing value in the assessment area was \$117,733 with an affordability ratio of 40.2. The median gross rent in the assessment area was \$686 per month.

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) 2015-2016 Housing Characteristics			
Area	2010 Median Housing Value	2010 Affordability Ratio	2010 Median Gross Rent
Assessment Area	\$117,733	40.22	\$686
Erie County, NY	\$117,700	40.25	\$686
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	\$113,883	41.35	\$673
New York State	\$303,900	18.30	\$977

Housing Cost Burden

Affordable housing for LMI individuals and families continued to be a challenge. According to HUD's 2014-2018 Comprehensive Housing Affordability Strategy data, within this assessment area, 44.8% of all rental households had rental costs that exceeded 30% of their incomes, 76.8% of low-income rental households had rental costs that exceeded 30% of their income, and 36.7% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 17.4% of homeowners had housing costs that exceeded 30% of their incomes, 64.4% of low-income homeowners had housing costs that exceeded 30% of their income, and 31.6% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the subsequent table for more details.

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) 2015-2016 Housing Cost Burden*						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	76.8%	36.7%	44.8%	64.4%	31.6%	17.4%
Erie County, NY	76.8%	36.7%	44.8%	64.4%	31.6%	17.4%
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	75.9%	34.1%	44.3%	64.5%	30.7%	17.6%
New York State	77.0%	48.6%	48.0%	73.8%	46.0%	27.4%

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

Labor, Employment and Economic Characteristics

According to D&B data, there were 35,684 businesses operating in this assessment area in 2015 and 2016, of which 8.3% were located in low-income census tracts and 14.3% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.9% were small businesses with a GAR of \$1 million or less, of which 7.8% were located in low-income census tracts and 14.0% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 5.1% in 2015 and decreased to 4.7% in 2016. The State of New York had an unemployment rate of 4.6% in 2015 and increased to 4.8% in 2016.

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) 2015-2016 Unemployment Rates		
Area	2015	2016
Assessment Area	5.1%	4.7%
Erie County, NY	5.1%	4.7%
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	4.9%	4.9%
New York State	4.6%	4.8%
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>		

Additional performance context data for this assessment area is provided in the subsequent MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) Assessment Area Demographics Table:

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) Assessment Area 2015-2016								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	12.7	22,167	9.6	8,846	39.9	49,936	21.6
Moderate-income	47	19.8	37,712	16.3	7,195	19.1	39,537	17.1
Middle-income	93	39.2	85,020	36.8	5,195	6.1	46,874	20.3
Upper-income	61	25.7	86,214	37.3	2,127	2.5	94,766	41
Unknown-income	6	2.5	0	0	0	0	0	0
Total Assessment Area	237	100.0	231,113	100.0	23,363	10.1	231,113	100.0
Housing Types by Tract								
Income Categories	Housing Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	52,935	13,265	5.3	25.1	26,740	50.5	12,930	24.4

Moderate-income	84,180	36,391	14.5	43.2	34,778	41.3	13,011	15.5
Middle-income	151,394	100,031	40	66.1	41,795	27.6	9,568	6.3
Upper-income	131,923	100,551	40.2	76.2	24,529	18.6	6,843	5.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	420,432	250,238	100.0	59.5	127,842	30.4	42,352	10.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,953	8.3	2,487	7.8	448	12.4	18	4.9
Moderate-income	5,087	14.3	4,426	14	627	17.4	34	9.3
Middle-income	13,318	37.3	11,719	37	1,450	40.2	149	40.9
Upper-income	14,238	39.9	13,012	41	1,063	29.5	163	44.8
Unknown-income	88	0.2	70	0.2	18	0.5	0	0
Total Assessment Area	35,684	100.0	31,714	100.0	3,606	100.0	364	100.0
	Percentage of Total Businesses:			88.9		10.1		1.0
	Total Farms by		Farms by Tract & Revenue Size					

	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	11	2.8	11	3	0	0	0	0
Moderate-income	19	4.9	18	4.9	1	5.6	0	0
Middle-income	201	52.1	191	52	10	55.6	0	0
Upper-income	155	40.2	147	40.1	7	38.9	1	100
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	386	100.0	367	100.0	18	100.0	1	100.0
	Percentage of Total Farms:			95.1		4.7		.3

Source: 2015 FFIEC Census Data and 2021 D&B Information

2017-2019 MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)

In 2017, 2018, and 2019, the relevant performance context data for this assessment area was derived from the 2015 ACS.

Demographic Characteristics

The MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area included Erie County. According to the 2015 ACS, the population of this assessment area was 921,584. The assessment area consisted of 237 census tracts, of which 38 or 16.0% were low-income, 41 or 17.3% were

moderate-income, 90 or 38.0% were middle-income, 60 or 25.3% were upper-income, and 8 or 3.4% were of unknown-income.

Income Characteristics

Based on the 2015 ACS data, the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area had 229,957 families, of which 22.1% were low-income (10.9% of which were below the poverty level), 16.5% were moderate-income, 19.9% were middle-income, and 41.6% were upper-income.

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

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) 2017-2019 Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$69,044	\$67,607	-2.08%
Erie County, NY	\$69,044	\$67,607	-2.08%
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	\$68,092	\$67,108	-1.45%
New York State	\$73,401	\$71,913	-2.03%
<small>Sources: 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.</small>			

Housing Characteristics

Based on the 2015 ACS data, the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area had 420,782 housing units, of which 59.1% were owner-occupied, 31.8% were rental, and 9.0% were vacant. Of the total housing units, 15.1% were located in low-income census tracts, 14.8% in moderate-income census tracts, 38.7% in middle-income census tracts, 31.2% in upper-income census tracts, and 0.2% in unknown-income census tracts. In low-income census tracts, 28.9% of housing units were owner-occupied, 52.2% were rental units, and 18.9% were vacant. In moderate-income census tracts, 44.7% of housing units were owner-occupied, 41.5% were rental units, and 13.8% were vacant.

The median age of housing stock in this assessment area was 61 years old, with 41.3% of the stock built before 1950. The median age of housing stock was 61 years in low-income census tracts and 61 years in moderate-income census tracts. According to the 2015 ACS, the median housing value in this assessment area was \$130,015 with an affordability ratio of 39.5. The median gross rent in this assessment area was \$739 per month.

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) 2017-2019 Housing Characteristics			
Area	2010 Median Housing Value	2010 Affordability Ratio	2010 Median Gross Rent
Assessment Area	\$130,015	39.49	\$739
Erie County, NY	\$130,000	39.42	\$739
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	\$125,014	40.77	\$725
New York State	\$283,400	20.91	\$1,132

Housing Cost Burden

Housing costs in this assessment area were a significant affordable housing constraint. Community contacts confirmed that affordable housing for LMI individuals and families continued to be a challenge. According to HUD’s 2014-2018 Comprehensive Housing Affordability Strategy data, within this assessment area, 44.8% of all rental households had rental costs that exceeded 30% of their incomes, 76.8% of low-income rental households had rental costs that exceeded 30% of their income, and 36.7% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD’s data, within this assessment area, 17.4% of homeowners had housing costs that exceeded 30% of their incomes, 64.4% of low-income homeowners had housing costs that exceeded 30% of their income, and 31.6% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the subsequent table for more details.

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) 2017-2019 Housing Cost Burden*						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	76.8%	36.7%	44.8%	64.4%	31.6%	17.4%
Erie County, NY	76.8%	36.7%	44.8%	64.4%	31.6%	17.4%
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	75.9%	34.1%	44.3%	64.5%	30.7%	17.6%
New York State	77.0%	48.6%	48.0%	73.8%	46.0%	27.4%

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

Labor, Employment and Economic Characteristics

According to D&B data, there were 32,160 businesses operating in this assessment area in 2017, of which 8.6% were located in low-income census tracts and 10.5% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 86.8% were small businesses with a GAR of \$1 million or less, of which 8.1% were located in low-income census tracts and 10.2% were located in moderate-income census tracts. In 2018, there were 37,420 businesses operating in the assessment area, of which 9.0% were located in low-income census tracts and 10.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.5% were small businesses with a GAR of \$1 million or less, of which 8.6% were located in low-income geographies and 10.6% were located in moderate-income geographies. In 2019, there were 36,752 businesses operating in the assessment area, of which 9.2% were located in low-income census tracts and 11.0% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.6% were small businesses with a GAR of \$1 million or less, of which 8.8% were located in low-income geographies and 10.8% were located in moderate-income geographies.

According to the U.S. Bureau of Labor Statistics, unemployment in this assessment area was 5.1% in 2017, decreased to 4.4% in 2018, and decreased to 4.1% in 2019. The State of New York had an unemployment rate of 4.6% in 2017, decreased to 4.1% in 2018, and decreased to 3.8% in 2019.

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) 2017-2019 Unemployment Rates			
Area	2017	2018	2019
Assessment Area	5.1%	4.4%	4.1%
Erie County, NY	5.1%	4.4%	4.1%
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	5.3%	4.5%	4.2%
New York State	4.6%	4.1%	3.8%
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>			

Additional performance context data for this assessment area is provided on the subsequent MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) Assessment Area Demographics Table:

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) Assessment Area 2017-2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	38	16	28,377	12.3	11,024	38.8	50,917	22.1
Moderate-income	41	17.3	29,041	12.6	5,278	18.2	37,837	16.5
Middle-income	90	38	88,563	38.5	6,357	7.2	45,650	19.9
Upper-income	60	25.3	83,808	36.4	2,415	2.9	95,553	41.6
Unknown-income	8	3.4	168	0.1	55	32.7	0	0
Total Assessment Area	237	100.0	229,957	100.0	25,129	10.9	229,957	100.0

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	63,564	18,364	7.4	28.9	33,158	52.2	12,042	18.9
Moderate-income	62,212	27,805	11.2	44.7	25,794	41.5	8,613	13.8
Middle-income	162,784	104,051	41.8	63.9	47,976	29.5	10,757	6.6
Upper-income	131,298	98,622	39.6	75.1	26,380	20.1	6,296	4.8
Unknown-income	924	47	0	5.1	649	70.2	228	24.7
Total Assessment Area	420,782	248,889	100.0	59.1	133,957	31.8	37,936	9.0

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2,770	8.6	2,260	8.1	491	12.5	19	6.1
Moderate-income	3,389	10.5	2,861	10.2	500	12.8	28	8.9
Middle-income	11,597	36.1	10,100	36.2	1,376	35.1	121	38.5
Upper-income	13,104	40.7	11,693	41.9	1,281	32.7	130	41.4
Unknown-income	1,300	4	1,015	3.6	269	6.9	16	5.1
Total Assessment Area	32,160	100.0	27,929	100.0	3,917	100.0	314	100.0
	Percentage of Total Businesses:			86.8		12.2		1.0

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	15	3.9	14	3.8	1	5.6	0	0
Moderate-income	6	1.6	5	1.4	1	5.6	0	0
Middle-income	199	51.8	190	52.1	9	50	0	0
Upper-income	159	41.4	151	41.4	7	38.9	1	100
Unknown-income	5	1.3	5	1.4	0	0	0	0
Total Assessment Area	384	100.0	365	100.0	18	100.0	1	100.0
	Percentage of Total Farms:		95.1		4.7			.3

Sources: 2017 FFIEC Census Data and 2017 D&B Information

2020-2021 MSA 15380 (Buffalo-Cheektowaga, NY)

In 2020 and 2021, while the relevant performance context data for this assessment area continued to be from the 2015 ACS, the bank added Niagara County to this assessment area. Therefore, Niagara County has been included in the performance context data.

Demographic Characteristics

The MSA 15380 (Buffalo-Cheektowaga, NY) assessment area included Erie County and Niagara County. The assessment area was comprised of the entire MSA. According to the 2015 ACS, the population of this assessment area was 1,135,734. The assessment area consisted of 299 census tracts, of which 46 or 15.4% were low-income, 54 or 18.1% were moderate-income, 119 or 39.8% were middle-income, 70 or 23.4% were upper-income, and 10 or 3.3% were of unknown-income.

Income Characteristics

Based on the 2015 ACS data, the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area had 284,789 families, of which 22.2% were low-income (10.7% of which were below the poverty level), 16.6% were moderate-income, 20.3% were middle-income, and 40.9% were upper-income.

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

MSA 15380 (Buffalo-Cheektowaga, NY) 2020-2021 Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$68,092	\$67,108	-1.45%
Erie County, NY	\$69,044	\$67,607	-2.08%
Niagara County, NY	\$64,761	\$65,275	0.79%
MSA 15380 (Buffalo-Cheektowaga, NY)	\$68,092	\$67,108	-1.45%
New York State	\$73,401	\$71,913	-2.03%
<small>Sources: 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.</small>			

Housing Characteristics

Based on the 2015 ACS data, the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area had 519,952 housing units, of which 59.8% were owner-occupied, 30.7% were rental, and 9.5% were vacant. Of the total housing units, 14.3% were located in low-income census tracts, 15.0% in moderate-income census tracts, 40.6% in middle-income census tracts, 29.9% in upper-income census tracts, and 0.2% in unknown-income census tracts. In low-income census tracts, 28.8% of housing units were owner-occupied, 51.4% were rental units, and 19.8% were vacant. In moderate-income census tracts, 45.4% of housing units were owner-occupied, 40.3% were rental units, and 14.4% were vacant.

The median age of housing stock in this assessment area was 61 years old, with 41.5% of the stock built before 1950. The median age of housing stock was 61 years in low-income census tracts and 61 years in moderate-income census tracts. According to the 2015 ACS, the median housing value in this assessment area was \$125,014 with an affordability ratio of 40.8. The median gross rent in this assessment area was \$725 per month.

MSA 15380 (Buffalo-Cheektowaga, NY) 2020-2021 Housing Characteristics			
Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$125,014	40.79	\$726
Erie County, NY	\$130,000	39.42	\$739
Niagara County, NY	\$108,000	45.79	\$654
MSA 15380 (Buffalo-Cheektowaga, NY)	\$125,014	40.77	\$725
New York State	\$283,400	20.91	\$1,132

Housing Cost Burden

Throughout the entirety of the review period, housing costs were relatively expensive in the assessment area and community contacts indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD's 2014-2018 Comprehensive Housing Affordability Strategy data, within this assessment area, 44.3% of all rental households had rental costs that exceeded 30% of their incomes, 75.9% of low-income rental households had rental costs that exceeded 30% of their income, and 34.1% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 17.6% 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 30.7% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the subsequent table for more details.

MSA 15380 (Buffalo-Cheektowaga, NY) 2020-2021 Housing Cost Burden						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	75.9%	34.1%	44.3%	64.5%	30.7%	17.6%
Erie County, NY	76.8%	36.7%	44.8%	64.4%	31.6%	17.4%
Niagara County, NY	71.0%	21.7%	41.6%	64.6%	27.4%	18.3%
MSA 15380 (Buffalo-Cheektowaga, NY)	75.9%	34.1%	44.3%	64.5%	30.7%	17.6%
New York State	77.0%	48.6%	48.0%	73.8%	46.0%	27.4%

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

Labor, Employment and Economic Characteristics

According to D&B data, there were 43,831 businesses operating in this assessment area in 2020, of which 9.0% were located in low-income census tracts and 11.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.1% were small businesses with a GAR of \$1 million or less, of which 8.7% were located in low-income census tracts and 11.6% were located in moderate-income census tracts. In 2021, there were 42,752 businesses operating in the assessment area, of which 9.3% were located in low-income census tracts and 11.9% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.1% were small businesses with a GAR of \$1 million or less, of which 8.9% were located in low-income geographies and 11.7% were located in moderate-income geographies.

According to the U.S. Bureau of Labor Statistics, unemployment in this assessment area was 9.3% in 2020, and decreased to 5.5% in 2021. The State of New York had an unemployment rate of 9.9% in 2020 and decreased to 6.9% in 2021. The significant increase in 2020 unemployment rates were

attributable to the state and national lockdowns due to the Covid-19 pandemic. For comparison and trend analysis, employment rates for the entire examination review period are included in the subsequent chart.

MSA 15380 (Buffalo-Cheektowaga, NY) 2020-2021 Unemployment Rates					
Area	2017	2018	2019	2020	2021
Assessment Area	5.3%	4.5%	4.2%	9.3%	5.5%
Erie County, NY	5.1%	4.4%	4.1%	9.1%	5.5%
Niagara County, NY	6.1%	5.2%	4.8%	10.1%	5.7%
MSA 15380 (Buffalo-Cheektowaga, NY)	5.3%	4.5%	4.2%	9.3%	5.5%
New York State	4.6%	4.1%	3.8%	9.9%	6.9%

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

Additional performance context data for this assessment area is provided in the subsequent MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area Demographics Table:

MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area 2020-2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	46	15.4	32,553	11.4	12,658	38.9	63,111	22.2
Moderate-income	54	18.1	36,407	12.8	6,619	18.2	47,385	16.6
Middle-income	119	39.8	115,776	40.7	8,308	7.2	57,838	20.3
Upper-income	70	23.4	99,885	35.1	2,858	2.9	116,455	40.9
Unknown-income	10	3.3	168	0.1	55	32.7	0	0
Total Assessment Area	299	100.0	284,789	100.0	30,498	10.7	284,789	100.0

	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	74,129	21,331	6.9	28.8	38,133	51.4	14,665	19.8
Moderate-income	78,092	35,439	11.4	45.4	31,444	40.3	11,209	14.4
Middle-income	211,232	136,347	43.8	64.5	59,122	28	15,763	7.5
Upper-income	155,575	118,019	37.9	75.9	30,122	19.4	7,434	4.8
Unknown-income	924	47	0	5.1	649	70.2	228	24.7
Total Assessment Area	519,952	311,183	100.0	59.8	159,470	30.7	49,299	9.5

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3,954	9	3,398	8.7	534	12.4	22	4.7
Moderate-income	5,186	11.8	4,523	11.6	623	14.4	40	8.6
Middle-income	16,422	37.5	14,698	37.6	1,525	35.4	199	42.8
Upper-income	16,834	38.4	15,270	39.1	1,374	31.9	190	40.9
Unknown-income	1,435	3.3	1,165	3	256	5.9	14	3
Total Assessment Area	43,831	100.0	39,054	100.0	4,312	100.0	465	100.0
	Percentage of Total Businesses:			89.1		9.8		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	20	3.3	20	3.5	0	0	0	0
Moderate-income	18	3	15	2.6	3	10.3	0	0
Middle-income	300	50.1	284	49.9	16	55.2	0	0
Upper-income	255	42.6	244	42.9	10	34.5	1	100
Unknown-income	6	1	6	1.1	0	0	0	0
Total Assessment Area	599	100.0	569	100.0	29	100.0	1	100.0
	Percentage of Total Farms:			95.0		4.8		.2

Source: 2020 FFIEC Census Data and 2020 D&B Information

Community Contacts

In order to learn more about community credit needs, examiners conducted a community contact interview with a non-profit organization that addressed community services and economic development. A community contact whose organization supports economic self-sufficiency through entrepreneurial training, technical assistance, access to financing for new and expanding businesses, and mortgage products for underserved borrowers, shared that the area needs access to affordable low-dollar loans. Another community contact from a social services agency for area families in need shared that one of the greatest needs was developing a skilled workforce through both workshops and on-the-job training. The community contact also noted that the existing affordable housing in the community is very old and often subjected to deferred maintenance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MSA 15380 (BUFFALO-CHEEKTOWAGA, NY)

LENDING TEST

Alden's performance relative to the lending test is Satisfactory. Lending performance in the MSA 15380 (Buffalo-Cheektowaga, NY) was considered reasonable based on a reasonable geographic distribution of lending and reasonable penetration among individuals of different income levels and businesses of different sizes. The greatest weight, based on number and volume, was given to HMDA lending followed by small business lending. Alden's lending performance was compared to the respective year's aggregate of all lenders required to report HMDA and small business data within the assessment area, as well as the area's demographic information. See the Aggregate Comparison Loan Distribution tables in CRA Appendix B for details of Alden's geographic distribution of lending and loan distribution by borrower income and business revenue size.

Geographic Distribution of Loans

Alden's overall geographic distribution of loans reflected reasonable dispersion throughout the assessment area. Alden's geographic distribution significantly improved over the review period as detailed on the Lending Gap Analysis found on the next page. In low-income census tracts, the distribution increased from 10.0% in 2015 to 33% in 2021, an increase of 226.1%. The percentage increase in moderate-income census tracts for the same period was 204.6%. While the penetration in low-income census tracts improved over the review period, it was lower than that in other income designations. Performance context information indicated that there were challenges in making loans in low-income census tracts due to lower owner occupancy levels and increased poverty levels. According to the 2015 ACS, only 7.4% of the owner-occupied housing units and 12.3% of the households in the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area were located in low-income census tracts. Also, according to the 2015 ACS, 38.8% of all families living in low-income census tracts had incomes below the poverty level, further limiting lending opportunities. Lending challenges were confirmed by the performance of the aggregate lending, which in 2015 made only 2.6% of HMDA loans in low-income census tracts. Aggregate performance was comparable in 2016 and then slowly increased over the review period to 4.0% in 2021. Despite the lending challenges, Alden was able to increase its lending penetration over the review period as detailed on the subsequent page.

Lending Gap Analysis – MSA 15380			
January 1, 2015 – December 31, 2021			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
2015			
Low	30	27	10%
Moderate	47	41	13%
Middle	93	65	30%
Upper	61	28	54%
Income Unknown	6	6	0%
2016			
Low	30	26	13%
Moderate	47	39	17%
Middle	93	58	38%
Upper	61	22	64%
Income Unknown	6	5	17%
2017			
Low	38	33	13%
Moderate	41	31	24%
Middle	90	61	32%
Upper	60	27	55%
Income Unknown	8	8	0%
2018			
Low	38	29	24%
Moderate	41	22	46%
Middle	90	51	43%
Upper	60	23	62%
Income Unknown	8	8	0%
2019			
Low	38	21	45%
Moderate	41	20	51%
Middle	90	64	29%
Upper	60	23	62%
Income Unknown	8	8	0%
2020			
Low	46	29	37%
Moderate	54	31	43%
Middle	119	84	29%
Upper	70	40	43%
Income Unknown	10	10	0%
2021			
Low	46	31	33%
Moderate	54	33	39%
Middle	119	85	29%
Upper	70	31	56%
Income Unknown	10	9	10%

Home Purchase Loans

Alden's overall home purchase lending distribution was considered excellent in light of the bank's improving performance over the examination review period. Alden's home purchase lending performance in low- and moderate-income census tracts was excellent when compared to the aggregate lending and assessment area demographic despite the performance context challenges particularly related to the availability of owner-occupied housing in low-income census tracts in the assessment area.

Alden's home purchase lending performance in low-income census tracts was excellent when compared to the aggregate lending and the assessment area demographic. In 2015, the bank originated 2.8% of its home purchase loans in low-income census tracts by number and 1.2% by dollar volume, exceeding the aggregate lending's performance of 2.3% by number and 1.2% by dollar. The assessment area demographic, according to the 2015 ACS, was 5.3% of owner-occupied housing units located in low-income census tracts. Home purchase lending performance in 2016 was comparable to 2015. In 2017, the bank originated 5.8% of its home purchase loans in low-income census tracts by number and 5.2% by dollar volume, exceeding the aggregate lending's performance of 4.8% by number and 2.6% by dollar. During 2018 through 2021, Alden continued to significantly outperform both the aggregate lending and the assessment area demographic. In 2018, the bank originated 9.5% of its home purchase loans by number in low-income census tracts and 4.0% by dollar volume, while the aggregate lending was 5.4% by number and 3.1% by dollar volume. Alden also outperformed the assessment area demographic of 7.4%. In 2019, Alden originated 15.4% by number and 11.9% by dollar volume in low-income tracts, while the aggregate lending was 5.2% by number and 3.1% by dollar volume while the assessment area demographic was 7.4%. In 2020 and 2021, Alden's lending in low-income census tracts exceeded the aggregate lending and assessment area demographic by an even greater percentage than in 2019.

Alden's home purchase lending performance in moderate-income census tracts was excellent when compared to the aggregate lending and assessment area demographic. While the bank's performance was poor in 2015, Alden improved its performance in 2016, 2017, 2018, and through the remainder of the exam period, where home purchase lending performance significantly exceeded the aggregate lending's lending performance in moderate-income census tracts. In 2015, the bank originated 4.2% of its home purchase loans in moderate-income census tracts by number and 1.9% by dollar volume, below the aggregate lending's performance of 11.7% by number and 7.6% by dollar volume. The assessment area demographic was 14.5% of owner-occupied housing units located in moderate-income census tracts. Home purchase lending performance in 2016 exceeded the bank's performance 2015 performance. In 2017 and 2018, the bank's performance continued to improve, and exceeded both the aggregate lending and the assessment area demographic. In 2019, the bank originated 24.0% of its home purchase loans by number in moderate-income census tracts and 14.9% by dollar volume while the aggregate lending was 9.9% by number and 6.7% by dollar volume and the assessment area demographic was 11.2%. In 2020 and 2021, Alden's lending in moderate-income census tracts continued to exceed the aggregate lending and assessment area

demographic.

Refinance Loans

Alden's overall home refinance lending distribution was considered reasonable in light of the bank's improving performance over the examination review period with the bank eventually exceeding the aggregate lending and the assessment area demographic despite the performance context challenges, particularly related to the availability of owner-occupied housing in low-income census tracts in the assessment area. Home refinance lending performance in low-income census tracts was reasonable and excellent in moderate-income census tracts when compared to the aggregate lending and the assessment area demographic.

Alden's home refinance lending performance in low-income census tracts was reasonable when compared to the aggregate lending and the assessment area demographic. While in 2015, 2016, and 2017, the bank did not originate any home refinance loans in low-income census tracts, its performance significantly improved for the remainder of the examination period. Further, the aggregate lending illuminated the difficulty in originating these loans, whose performance in 2015 was 1.8% by number and 1.2% by dollar volume. The assessment area demographic provided that 5.3% of owner-occupied housing units were located in low-income census tracts. The aggregate's performance in originating home refinance loans in low-income census tracts in 2016 and 2017 was comparable to aggregate performance in 2015. In 2018, Alden originated one home refinance loan in a low-income census tract. During 2019 through 2021, Alden significantly outperformed the aggregate lending, and the bank's performance was comparable to the assessment area demographic. In 2019, the bank originated 5.7% of its home refinance loans in low-income census tracts by number and 10.0% by dollar volume, outperforming the aggregate lending at 3.6% by number and 2.3% by dollar volume. In the same year, the assessment area demographic was 7.4%. The bank's performance in 2020 and 2021 also outperformed the aggregate lending. In 2020, Alden originated 5.9% of its refinance loans in low-income census tracts by number and 3.6% by dollar volume while exceeding the aggregate lending's performance of 2.1% by number and 1.3% by dollar volume, and the assessment area demographic was 6.9%. In 2021, the bank again exceeded the aggregate lending.

Alden's home refinance lending performance in moderate-income census tracts was excellent when compared to the aggregate lending and the assessment area demographic. While the bank's performance was below the aggregate lending in 2015, 2016, and 2017, performance was comparable to the aggregate lending in 2018 and 2019 and exceeded the aggregate lending in 2020 and 2021. In 2015, the bank originated 5.6% of its home refinance loans in moderate-income census tracts by number and 3.0% by dollar volume, below the aggregate lending's performance of 9.3% by number and 6.1% by dollar and below the assessment area demographic of 14.5% of owner-occupied housing units located in moderate-income census tracts. Home refinance lending performance in 2016 and 2017 was comparable to the bank's performance 2015 performance where the bank's distribution of home refinance lending was below the aggregate lending's performance

and below the assessment area demographic. In 2018 and 2019, the bank's performance improved and was comparable to the aggregate lending. In 2020 and 2021, the bank's performance further improved. In 2020, Alden originated 9.8% of its home refinance loans in moderate-income census tracts by number and 6.1% by dollar volume while the aggregate lending was 5.5% by number and 3.5% by dollar volume and the assessment area demographic was 11.4%. The bank's performance in 2021 also exceeded the aggregate lending and was comparable to the assessment area demographic.

Home Improvement Loans

Alden's overall home improvement lending distribution was considered reasonable in light of the bank's improving performance over the examination review period and its ability to eventually exceed the aggregate lending and assessment area demographic despite the challenges highlighted by the performance context, particularly related to the availability of owner-occupied housing in low-income census tracts in this assessment area. Alden's home improvement lending performance in low-income census tracts was reasonable and excellent in moderate-income census tracts when compared to the aggregate lending and the assessment area demographic.

Alden's home improvement lending performance in low-income census tracts was reasonable when compared to the aggregate lending and the assessment area demographic. In 2015, the bank did not originate any home improvement loans in low-income census tracts while the aggregate lending originated 6.3% by number and 2.8% by dollar volume and assessment area demographic was 5.3% of owner-occupied housing units located in low-income census tracts. In 2016 and 2017, the bank originated one loan in each year and lending performance was below the aggregate lending and assessment area demographic. In 2018, home improvement lending performance in low-income census tracts was comparable to the aggregate lending and the assessment area demographic. In 2019 and 2020, Alden significantly outperformed both the aggregate lending and the assessment area demographic comparable. In 2020, the bank originated 26.9% of its home improvement loans in low-income census tracts by number and 26.8% by dollar volume while the aggregate lending was 4.7% by number and 3.7% by dollar volume. Also in 2020, the bank outperformed the assessment area demographic which was 6.9% of owner-occupied housing units located in low-income census tracts. In 2021, Alden did not originate any home improvement loans in low-income census tracts.

Alden's home improvement lending performance in moderate-income census tracts was excellent when compared to the aggregate lending and the assessment area demographic. In 2015, the bank originated one home improvement loan in a moderate-income census tract equating to 1.2% by number and 0.1% by dollar volume, while the aggregate lending originated 15.3% by number and 6.9% by dollar volume and the assessment area demographic was 14.5%. The bank originated one loan in 2016 and two loans in 2017, each year's performance was below the aggregate lending and the assessment area demographic. However, Alden significantly outperformed the aggregate lending during the remainder of the examination period. In 2018, the bank originated 9.7% of its

home improvement loans in moderate-income census tracts by number and 7.6% by dollar volume, exceeding the aggregate lending's performance of 7.8% by number and 6.6% by dollar volume but below the assessment area demographic of 11.2%. Home improvement lending performance in moderate-income census tracts significantly improved in 2019 when the bank originated 13.3% of loans by number and 11.6% by dollar volume while outperforming the aggregate lending of 9.6% by number and 7.8% by dollar volume, and also outperforming the assessment area demographic of 11.2%. In 2020, Alden significantly outperformed both the aggregate lending and assessment area demographic. In 2021, the bank's performance continued to improve, as the bank originated 16.7% of its home improvement loans in moderate-income census tracts by number and 35.1% by dollar volume while the aggregate lending was 9.4% by number and 7.3% by dollar volume and assessment area demographic was 11.4%.

Small Business Loans

Alden's overall small business lending performance in LMI geographies was poor when compared to D&B business establishment data and the aggregate lending.

Small business performance in low-income census tracts was poor as Alden made 6.3% of its small business loans in low-income census tracts by number and 2.5% by dollar volume in 2021, given that 9.3% of all businesses were located in low-income census tracts. Alden's performance was below the aggregate lending, which made 10.1% of its small business loans by number and 9.2% by dollar in low-income census tracts.

Alden's small business performance in moderate-income census tracts was also poor as the bank made only one small business loans in moderate-income census tracts in 2021 compared to 11.9% of businesses located in moderate-income census tracts. The aggregate lending in 2021 was 11.7% by number and 13.0% by dollar volume, while 11.9% of businesses were located in moderate-income census tracts.

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

Lending performance in the assessment area showed reasonable penetration among all income levels, including LMI individuals and businesses of different sizes. Housing was generally more affordable to moderate-income borrowers in the assessment area, while housing costs were disproportionately burdensome for low-income borrowers. Based upon this performance context consideration, HMDA lending to moderate-income borrowers was weighted more for this analysis. Alden's performance in lending to LMI borrowers and businesses of different sizes are summarized as follows.

Home Purchase Loans

Alden's overall lending distribution of home purchase loans to LMI borrowers was reasonable based on reasonable distribution to low-income borrowers and poor distribution to moderate-income borrowers.

Alden's home purchase lending performance to low-income borrowers was reasonable when compared to the aggregate lending and the assessment area demographic. In 2015, the bank originated 6.9% of its home purchase loans to low-income borrowers by number and 3.0% by dollar volume, below the aggregate lending's performance of 9.1% by number and 4.7% by dollar, while the assessment area demographic was 21.6% of the families in the MSA being low-income. Home purchase lending to low-income borrowers in 2016 and 2018 was below the aggregate lending performance. In 2017, Alden originated one home purchase loan to a low-income borrower. In 2019 through 2021, Alden's performance improved and was comparable to the aggregate lending but was below the assessment area demographic. In 2019, the bank originated 7.7% of its home purchase loans to low-income borrowers by number and 5.3% by dollar volume while the aggregate lending was 8.7% by number and 5.0% by dollar volume and the assessment area demographic showed that 22.1% of families in the assessment area were low-income borrowers.

Alden's home purchase lending performance in moderate-income census tracts was poor when compared to the aggregate lending and the assessment area demographic. In 2015, the bank originated 8.3% of its home purchase loans to moderate-income borrowers by number and 5.2% by dollar volume, below the aggregate lending's performance of 23.6% by number and 16.8% by dollar volume and the assessment area demographic of 17.1%. Home purchase lending performance in 2016 was comparable to the bank's performance in 2015. In 2017, the bank's performance improved with 13.0% of its home purchase loans to moderate-income borrowers by number and 8.6% by dollar volume but was below the aggregate lending of 20.8% by number and 14.6% by dollar volume and was below the assessment area demographic of 16.5%. Alden's performance in 2018, 2019, 2020, and 2021 was significantly below the aggregate lending and the assessment area demographic.

Refinance Loans

Alden's overall distribution of refinance loans to LMI borrowers was excellent in light of the bank's improving performance over the examination review period, including routinely exceeding the aggregate lending and assessment area demographic.

Alden's distribution of refinance loans to low-income borrowers was excellent when compared to the aggregate lending. While the bank's performance in 2015 slightly exceeded the aggregate lending, its performance throughout the rest of the review period significantly exceeded the aggregate lending. In 2016, the bank originated 14.6% of its home refinance loans to low-income borrowers by number and 8.3% by dollar volume, outperforming the aggregate lending at 5.6% by

number and 2.9% by dollar volume. However, Alden's performance was below the assessment area demographic of 22.1% of families being low-income. In 2017, the bank's performance exceeded the aggregate lending by an even greater margin when the bank originated 22.7% of its home refinance loans to low-income borrowers by number and 13.4% by dollar volume, while the aggregate lending was 7.2% by number and 3.6% by dollar volume. Alden's performance also exceeded the assessment area demographic of 22.1%. In 2018, the bank originated 14.0% by number and 9.4% by dollar volume outperforming the aggregate lending at 10.6% by number and 6.5% by dollar volume; however, Alden performed below the assessment area demographic of 22.1%. The bank's performance in 2019 was comparable to 2018. In 2020, the bank again significantly outperformed the aggregate lending by originating 12.7% of its home refinance loans to low-income borrowers by number and 8.6% by dollar while the aggregate lending was 5.0% by number and 2.4% by dollar volume; however, the bank performed below the assessment area demographic of 22.2%. In 2021, the bank similarly outperformed the aggregate lending as it did in 2020 but performed below the assessment area demographic.

Alden's distribution of refinance loans to moderate-income borrowers was reasonable when compared to the aggregate lending and assessment area demographic. While the bank's performance in 2015 exceeded the aggregate lending, its performance throughout the rest of the review period significantly exceeded the aggregate lending. In 2015, the bank originated 29.6% of its home refinance loans to moderate-income borrowers by number and 15.9% by dollar volume, significantly outperforming the aggregate lending with 17.6% by number and 12.2% by dollar volume and also significantly exceeding the assessment area demographic when 17.1% of families in the assessment area were moderate-income. In 2016, the bank originated 16.7% of its home refinance loans to moderate-income borrowers by number and 14.1% by dollar volume, slightly outperforming the aggregate lending with 14.4% by number and 10.4% by dollar volume, and slightly outperforming to the assessment area demographic of 16.5%. In 2017, the bank's performance was slightly below the aggregate lending when the bank originated 13.6% of its home refinance loans to moderate-income borrowers by number and 7.1% by dollar volume, while the aggregate lending was 17.4% by number and 11.3% by dollar volume and 16.5% of families in the assessment area were moderate-income. The bank's performance, when compared to the aggregate lending in 2018, 2019 and 2020, was similar to 2017, while the bank's performance was comparable to, or exceeded, the assessment area demographic. In 2021, the bank again outperformed the aggregate lending by originating 19.8% of its home refinance loans to moderate-income borrowers by number and 16.8% by dollar volume while the aggregate lending was 18.5% by number and 12.9% by dollar volume, as well as exceeded the assessment area demographic of 16.6%. Also in 2021, the bank again outperformed the assessment area demographic of 16.6% of families in the assessment area being moderate-income.

Home Improvement Loans

Alden's overall distribution of home improvement loans to borrowers of different income levels was reasonable based on reasonable distribution to low-income borrowers and excellent distribution

to moderate-income borrowers.

Alden's distribution of home improvement loans to low-income borrowers was reasonable when compared to the aggregate lending and assessment area demographic. In 2015, the bank originated 24.4% of its home improvement loans to low-income borrowers by number and 9.3% by dollar volume, exceeding the aggregate lending's performance of 13.8% by number and 5.3% by dollar, as well as exceeding the assessment area demographic of 21.6% of low-income families in the assessment area. In 2016, the bank originated 17.1% of its home improvement loans to low-income borrowers by number and 8.1% by dollar volume, exceeding the aggregate lending's performance of 11.6% by number and 4.2% by dollar. However, the bank's performance was slightly below the assessment area demographic of 22.1%. Alden's performance in 2017 and 2018 was comparable to 2016. In 2019, the bank originated 10.0% of its home improvement loans to low-income borrowers by number and 2.4% by dollar volume, while the aggregate lending was 10.9% by number and 7.6% by dollar volume and the assessment area demographic was 22.1%. In 2017 and 2020, Alden originated one home improvement loan in each year to a low-income borrower. In 2021, the bank originated 12.5% by number and 3.2% by dollar volume of its home improvement loans to low-income borrowers, exceeding the aggregate lending in number of loans, while the aggregate lending was 9.0% by number and 6.4% by dollar volume, and the assessment area demographic was 22.2%.

Alden's distribution of home improvement loans to moderate-income borrowers was excellent when compared to the aggregate lending and the assessment area demographic, exceeding both, in six of the seven years in the review period. In 2015, the bank originated 29.1% of its home improvement loans to moderate-income borrowers by number and 28.3% by dollar volume, exceeding the aggregate lending's performance of 25.9% by number and 15.4% by dollar volume, as well as exceeding the assessment area demographic of 17.1% of the families in the assessment area being moderate-income. The bank's performance in 2016 and 2017 was comparable to 2015. In 2018, the bank originated two home improvement loans to moderate-income borrowers and performance fell to 6.5% by number and 2.9% by dollar volume, while the aggregate's performance was 18.5% by number and 14.7% by dollar, and the assessment area demographic was 16.5%. In 2019, the bank's performance significantly improved with 20.0% of its home improvement loans originations to moderate-income borrowers by number and 6.1% by dollar volume, while the aggregate lending's performance was 18.5% by number and 14.9% by dollar. In 2020, the bank again exceeded both the aggregate lending and assessment area demographic. In 2020, Alden originated 23.1% of its home improvement loans to moderate-income borrowers by number and 18.9% by dollar volume, exceeding the aggregate lending of 18.3% by number and 14.4% by dollar volume, and as well as exceeded the assessment area demographic of 16.6% of families in the assessment area being moderate-income. Performance in 2021 was similar to that in 2020 when the bank again exceeded both the aggregate lending and assessment area demographic.

Small Business Loans

The overall level of lending to small businesses was reasonable based on Alden exceeding the aggregate lending of small business loans to businesses with GAR of \$1 million or less and reflected reasonable performance of loans in amounts of \$100,000 or less.

In 2021, Alden made 51.6% of its small business loans by number and 39.4% by dollar volume to businesses with GAR of \$1 million or less while 89.1% of all businesses in the assessment area had GAR of \$1 million or less. Alden’s lending performance exceeded the aggregate, which made 43.1% of its loans by number and 24.5% by dollar volume to businesses with GAR of \$1 million or less.

During 2021, 62.5% by number and 19.0% by dollar volume of Alden’s loans to small businesses were in amounts of \$100,000 or less. Alden’s performance was below the aggregate which originated 89.5% of its loans by number and 32.1% by dollar volume in amounts of \$100,000 or less; however, the aggregate lending included credit card lenders which typically have smaller loan amounts.

COMMUNITY DEVELOPMENT TEST

Alden’s performance under the community development test in the MSA 15380 (Buffalo-Cheektowaga, NY) is rated Satisfactory. Alden demonstrated overall adequate responsiveness to the community development needs of this assessment area through community development loans, qualified investments, and community development services. This review also considered Alden’s capacity, the need and availability of opportunities for community development in the assessment area, and the performance of local competitors and their responsiveness to community development needs.

Summary of Community Development Loans and Qualified Investments MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area By Primary Purpose Designation January 26, 2016 – October 31, 2022						
Designation	Loans		Investments		Total	
	#	(\$,000)	#	(\$,000)	#	(\$,000)
Affordable Housing	15	5,440	0	0	15	5,440
Community Services	0	0	1	500	1	500
Economic Development	3	2,736	0	0	3	2,736
Revitalize and Stabilize	16	1,081	0	0	16	1,081
Total	34	9,257	1	500	35	9,757

The bank’s overall community development loans and investment activity in MSA 15380 (Buffalo-

Cheektowaga, NY) totaled \$9.8 million. Of Alden's overall community development loans and investments, 92.7% were made in this assessment area. The current CRA evaluation was Alden's first under the Intermediate Small Institution Examination Procedures, so a comparison to the prior evaluation's community development loans and qualified investments was not conducted.

Community Development Loans

Community development loans in the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area totaled \$9.3 million. Community development lending was focused on the provision of affordable housing and was responsive a need identified at the community contact interview and supported by the performance context. In this assessment area, 58.8% of community development loan activity went towards affordable housing efforts, while 29.6% went toward economic development, and 11.7% to revitalization and stabilization activities. Examples of community development loans include:

- A \$2 million loan to revitalize an abandoned warehouse in an economic opportunity zone that provided new jobs in a LMI area.
- A \$150,000 loan to purchase a multi-family property in a low-income census tract to provide six units of affordable housing.
- A \$1.0 million loan to purchase and renovate 13 units of income-qualified affordable housing in a low-income census tract.

Community Development Investments

Community development investment activity in the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area consisted of a \$500,000 qualified investment. The community development investment was made during the current examination review period and was a \$500,000 municipal bond for school improvements, including a workforce development center located in a moderate-income census tract. Additionally, the bank also made \$31,230 in qualified philanthropic grants and donations. The grants and donations were made primarily for community service activities.

Community Development Services

Alden provided 26 technical assistance activities and two financial literacy seminars to 22 organizations that furnished community development services to LMI individuals. Six bank employees also served on boards or committees of 22 community development organizations. Examples of community development services include:

- A bank officer provided financial expertise to an organization that assisted low-income families afford childcare.
- A bank officer served as a board member and provided financial technical assistance for an organization that prepared and delivered food to LMI families.

- A bank officer served as a board member for an organization that provided financial education and youth development for low-income or underprivileged families.

**NON-METROPOLITAN AREAS
(Genesee County and Wyoming County, NY)**

Limited Review

DESCRIPTION OF INSTITUTION’S OPERATION

A limited evaluation of Alden’s performance in the Non-Metropolitan (Genesee and Wyoming Counties, NY) assessment area was completed. According to the 2015 ACS, this assessment area had 8.2% of the population in Alden’s combined assessment areas and according to 2021 D&B data, 7.1% of all business establishments. Key demographics are listed below.

Assessment Area Demographics Non-Metropolitan (Genesee and Wyoming Counties, 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	0.0
Moderate Income	1	3.8	1.4	2.0
Middle Income	23	88.5	92.5	92.0
Upper Income	2	7.7	6.0	6.1
Unknown	0	0.0	0.0	0.0
Total	26	100.0	100.0	100.0

Alden has no branches in this assessment area and lending activity represented 21.1% of the total lending in the combined assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Alden’s performance in the Non-Metropolitan (Genesee and Wyoming Counties, NY) assessment area was generally consistent with its overall satisfactory performance, which was based on the full-scope assessment area performance.

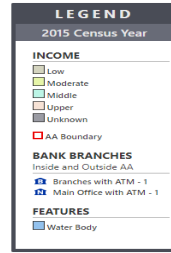
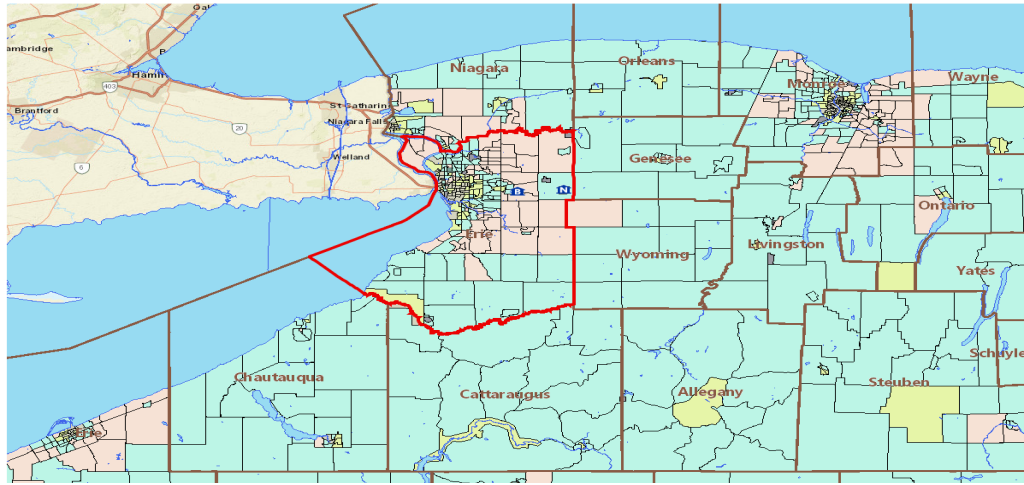
Assessment Area	Lending Test	Community Development Test
Non-Metropolitan (Genesee & Wyoming, NY)	Exceeded	Below

During the evaluation period, Alden’s performance under the lending test exceeded the bank’s reasonable performance related to borrower distribution. During the evaluation period, Alden made 12.6% of its HMDA loans to LMI borrowers, compared to 16.7% LMI families in the assessment area. Alden made 80.0% of its small business loans to businesses with GAR of \$1 million or less

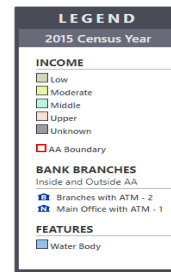
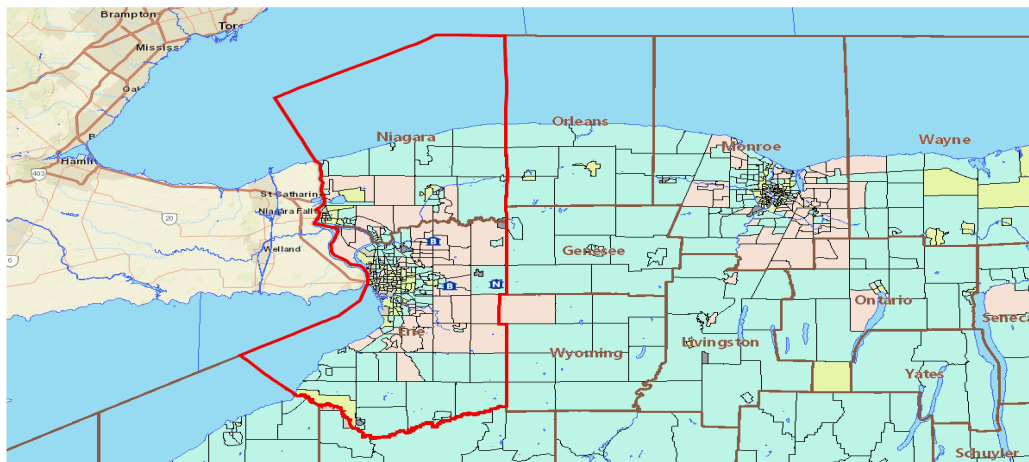
substantially outperforming to the aggregate lending of 52.1%. Alden's geographic distribution of loans was not evaluated since there was only one LMI census tract in this assessment area. Refer to the Aggregate Comparison Loan Distribution tables in CRA Appendix B for details of the bank's performance throughout the review period. Performance under the community development test was below Alden's adequate performance, with \$386,000 in community development loans and investments in the Non-Metropolitan (Genesee and Wyoming, NY) assessment area. The current evaluation is Alden's first under the Intermediate Small Institution Examination Procedures, so a comparison to the prior evaluation's community development loans and qualified investments was not possible.

CRA APPENDIX A MAPS OF THE ASSESSMENT AREA

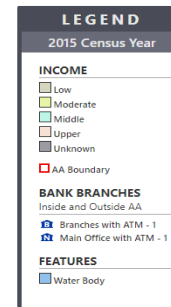
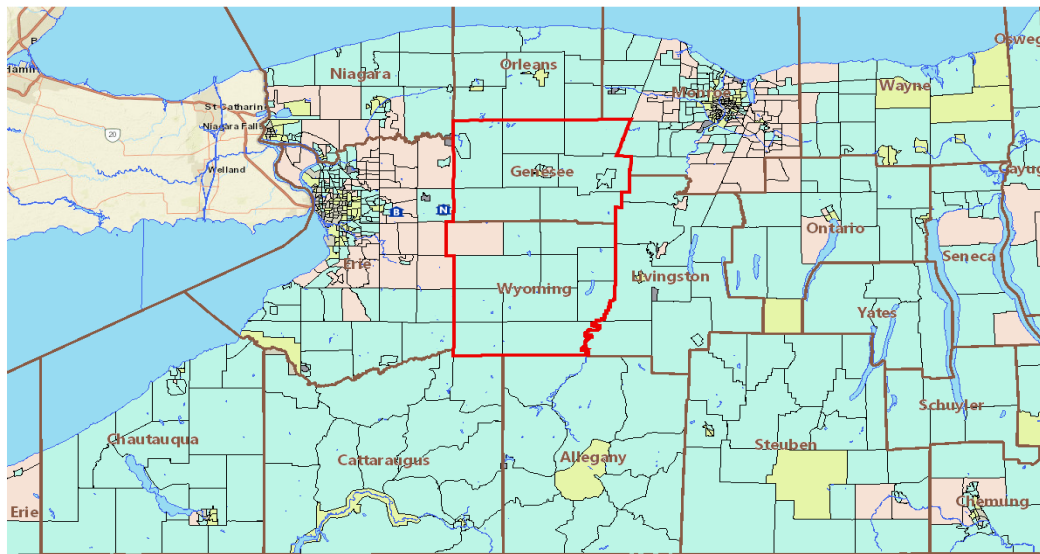
Alden State Bank
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) Assessment Area 2015-2019



Alden State Bank
MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area 2020-2021



Alden State Bank
Non-Metropolitan (Genesee and Wyoming Counties, NY) Assessment Area 2015-2019



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

Home Mortgage Lending By Income Level of Geography

Distribution of 2015 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 15380 - Buffalo-Cheektowaga, NY							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	2	2.8	2.3	156	1.2	1.2	5.3
Moderate	3	4.2	11.7	244	1.9	7.6	14.5
Middle	27	37.5	42.9	3,472	27.3	34.1	40.0
Upper	40	55.6	43.0	8,857	69.6	57.0	40.2
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	72	100.0	100.0	12,729	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.8	0	0.0	1.2	5.3
Moderate	3	5.6	9.3	217	3.0	6.1	14.5
Middle	29	53.7	39.6	3,943	54.0	32.6	40.0
Upper	22	40.7	49.3	3,140	43.0	60.0	40.2
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	54	100.0	100.0	7,300	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.3	0	0.0	2.8	5.3
Moderate	1	1.2	15.3	3	0.1	6.9	14.5
Middle	65	75.6	41.1	2,705	81.4	35.8	40.0
Upper	20	23.3	37.1	617	18.6	54.5	40.2
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	86	100.0	100.0	3,325	100.0	100.0	100.0
Multifamily Loans							
Low	1	25.0	19.5	1,200	43.7	8.1	20.7
Moderate	0	0.0	14.4	0	0.0	2.7	16.2
Middle	2	50.0	35.6	843	30.7	22.8	34.9
Upper	1	25.0	30.5	705	25.7	66.4	28.1
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	4	100.0	100.0	2,748	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	3	1.4	2.6	1,356	5.2	2.2	5.3
Moderate	7	3.2	11.5	464	1.8	6.7	14.5
Middle	123	56.9	41.9	10,963	42.0	32.3	40.0
Upper	83	38.4	44.0	13,319	51.0	58.8	40.2
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	216	100.0	100.0	26,102	100.0	100.0	100.0

Source: 2015 FFIEC Census Data
2006-2010 U.S. Census Bureau; American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2015 Home Mortgage Lending By Income Level of Geography Assessment Area: Non-MSA - Wyoming and Genesee Counties							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.7	0	0.0	3.4	4.2
Middle	19	76.0	72.6	3,149	79.2	72.0	72.3
Upper	6	24.0	22.8	825	20.8	24.6	23.5
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	25	100.0	100.0	3,974	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.5	0	0.0	2.7	4.2
Middle	13	54.2	71.0	981	54.3	71.6	72.3
Upper	11	45.8	25.4	827	45.7	25.7	23.5
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	24	100.0	100.0	1,808	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.8	0	0.0	1.7	4.2
Middle	32	72.7	68.8	1,021	82.1	64.4	72.3
Upper	12	27.3	28.4	222	17.9	33.8	23.5
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	44	100.0	100.0	1,243	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.0	0	0.0	34.4	9.2
Middle	0	0.0	90.0	0	0.0	65.6	83.6
Upper	0	0.0	0.0	0	0.0	0.0	7.2
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
Total Home Mortgage Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.1	0	0.0	5.1	4.2
Middle	64	68.8	71.6	5,151	73.3	71.1	72.3
Upper	29	31.2	24.3	1,874	26.7	23.8	23.5
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	93	100.0	100.0	7,025	100.0	100.0	100.0

Source: 2015 FFIEC Census Data

2006-2010 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 15380 - Buffalo-Cheektowaga, 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	2	2.8	2.3	118	1.2	1.4	4	5.8	4.8	608	5.2	2.6	7.4
Moderate	5	7.0	11.3	488	5.0	7.9	9	13.0	10.3	829	7.0	6.7	11.2
Middle	37	52.1	43.4	4,705	47.8	35.6	30	43.5	44.4	4,624	39.2	38.4	41.8
Upper	27	38.0	43.0	4,527	46.0	55.2	26	37.7	40.5	5,741	48.6	52.2	39.6
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	71	100.0	100.0	9,838	100.0	100.0	69	100.0	100.0	11,802	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.4	0	0.0	1.0	0	0.0	3.3	0	0.0	1.7	7.4
Moderate	3	6.3	9.8	278	4.6	6.2	3	4.5	8.4	420	4.6	5.0	11.2
Middle	24	50.0	36.8	2,517	41.2	30.5	41	62.1	44.6	5,381	58.7	34.7	41.8
Upper	21	43.8	51.1	3,313	54.2	62.3	22	33.3	43.8	3,364	36.7	58.6	39.6
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	48	100.0	100.0	6,108	100.0	100.0	66	100.0	100.0	9,165	100.0	100.0	100.0
Home Improvement Loans													
Low	1	0.8	5.9	214	3.9	3.9	1	1.2	9.2	56	1.8	4.1	7.4
Moderate	1	0.8	14.2	52	0.9	9.3	2	2.3	11.8	46	1.5	7.2	11.2
Middle	81	65.9	41.0	3,069	55.5	32.6	53	61.6	44.6	1,819	58.7	41.1	41.8
Upper	39	31.7	38.8	2,177	39.4	54.2	30	34.9	34.3	1,177	38.0	47.6	39.6
Unknown	1	0.8	0.1	19	0.3	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	123	100.0	100.0	5,531	100.0	100.0	86	100.0	100.0	3,098	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	25.0	12.3	1,035	33.7	8.2	0	0.0	14.1	0	0.0	24.4	17.4
Moderate	0	0.0	27.2	0	0.0	11.8	0	0.0	17.6	0	0.0	8.0	12.5
Middle	0	0.0	33.3	0	0.0	43.2	0	0.0	43.5	0	0.0	23.2	37.5
Upper	3	75.0	27.2	2,037	66.3	36.7	0	0.0	23.5	0	0.0	44.0	31.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.2	0	0.0	0.5	1.5
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	3,072	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	1.6	2.6	1,367	5.6	1.8	5	2.3	4.9	664	2.8	4.2	7.4
Moderate	9	3.7	11.3	818	3.3	7.8	14	6.3	10.0	1,295	5.4	6.4	11.2
Middle	142	57.7	41.4	10,291	41.9	34.8	124	56.1	44.4	11,824	49.1	36.4	41.8
Upper	90	36.6	44.7	12,054	49.1	55.6	78	35.3	40.6	10,282	42.7	52.9	39.6
Unknown	1	0.4	0.0	19	0.1	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	246	100.0	100.0	24,549	100.0	100.0	221	100.0	100.0	24,065	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 2016 and 2017 Home Mortgage Lending By Income Level of Geography Assessment Area: Non-MSA - Wyoming and Genesee Counties													
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	6.7	0	0.0	4.7	0	0.0	2.4	0	0.0	1.8	1.4
Middle	7	50.0	72.7	1,095	48.1	72.0	10	71.4	90.4	1,228	67.4	89.1	92.5
Upper	7	50.0	20.6	1,183	51.9	23.3	4	28.6	7.2	593	32.6	9.1	6.0
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	14	100.0	100.0	2,278	100.0	100.0	14	100.0	100.0	1,821	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	3.6	0	0.0	2.8	0	0.0	0.8	0	0.0	0.5	1.4
Middle	13	81.3	68.1	1,269	63.7	66.6	16	76.2	92.7	1,953	76.9	91.3	92.5
Upper	3	18.8	28.3	723	36.3	30.6	5	23.8	6.5	588	23.1	8.3	6.0
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	16	100.0	100.0	1,992	100.0	100.0	21	100.0	100.0	2,541	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	3.5	0	0.0	3.0	0	0.0	2.1	0	0.0	1.5	1.4
Middle	24	66.7	65.6	877	75.9	65.7	30	63.8	86.5	2,144	74.9	85.5	92.5
Upper	12	33.3	30.9	279	24.1	31.3	17	36.2	11.5	717	25.1	13.1	6.0
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	36	100.0	100.0	1,156	100.0	100.0	47	100.0	100.0	2,861	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	1.8
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	84.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	13.7
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	5.4	0	0.0	4.1	0	0.0	1.9	0	0.0	1.3	1.4
Middle	44	66.7	70.5	3,241	59.7	70.4	56	68.3	90.4	5,325	73.7	90.2	92.5
Upper	22	33.3	24.1	2,185	40.3	25.5	26	31.7	7.7	1,898	26.3	8.5	6.0
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	66	100.0	100.0	5,426	100.0	100.0	82	100.0	100.0	7,223	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 15380 - Buffalo-Cheektowaga, 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	9	9.5	5.4	735	4.0	3.1	16	15.4	5.2	1,975	11.9	3.1	7.4
Moderate	21	22.1	9.8	1,934	10.6	6.6	25	24.0	9.9	2,464	14.9	6.7	11.2
Middle	32	33.7	43.7	4,519	24.9	37.6	33	31.7	44.6	3,988	24.1	39.0	41.8
Upper	33	34.7	41.1	10,994	60.5	52.6	30	28.8	40.2	8,105	49.0	51.1	39.6
Unknown	0	0.0	0.0	0	0.0	0.1	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	95	100.0	100.0	18,182	100.0	100.0	104	100.0	100.0	16,532	100.0	100.0	100.0
Refinance Loans													
Low	1	0.8	3.5	112	0.7	2.4	5	5.7	3.6	1,288	10.0	2.3	7.4
Moderate	9	7.4	8.7	655	4.3	5.9	7	8.0	8.1	1,069	8.3	5.6	11.2
Middle	59	48.8	41.7	6,136	40.7	35.7	42	48.3	40.1	4,201	32.6	33.5	41.8
Upper	52	43.0	46.1	8,170	54.2	55.8	33	37.9	48.2	6,328	49.1	58.6	39.6
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	121	100.0	100.0	15,073	100.0	100.0	87	100.0	100.0	12,886	100.0	100.0	100.0
Home Improvement Loans													
Low	2	6.5	4.6	312	13.5	3.0	5	16.7	5.6	519	20.2	4.5	7.4
Moderate	3	9.7	7.8	175	7.6	6.6	4	13.3	9.6	298	11.6	7.8	11.2
Middle	17	54.8	40.6	1,132	49.2	36.6	13	43.3	39.1	443	17.2	34.1	41.8
Upper	9	29.0	47.0	684	29.7	53.8	8	26.7	45.7	1,313	51.0	53.1	39.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	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	31	100.0	100.0	2,303	100.0	100.0	30	100.0	100.0	2,573	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	33.3	17.2	150	3.9	8.4	7	46.7	17.0	3,767	45.2	7.2	17.4
Moderate	0	0.0	20.9	0	0.0	8.6	2	13.3	16.0	650	7.8	4.2	12.5
Middle	1	33.3	39.3	134	3.5	23.9	3	20.0	40.4	1,095	13.2	56.2	37.5
Upper	1	33.3	20.9	3,568	92.6	29.7	3	20.0	25.5	2,813	33.8	31.5	31.1
Unknown	0	0.0	1.8	0	0.0	29.3	0	0.0	1.1	0	0.0	0.9	1.5
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	3,852	100.0	100.0	15	100.0	100.0	8,325	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	13	5.2	4.8	1,309	3.3	3.7	33	14.0	4.9	7,549	18.7	3.8	7.4
Moderate	33	13.2	9.4	2,764	7.0	6.8	38	16.1	9.4	4,481	11.1	6.0	11.2
Middle	109	43.6	42.5	11,921	30.2	35.2	91	38.6	42.3	9,727	24.1	40.8	41.8
Upper	95	38.0	43.2	23,416	59.4	50.3	74	31.4	43.4	18,559	46.0	49.1	39.6
Unknown	0	0.0	0.1	0	0.0	4.1	0	0.0	0.1	0	0.0	0.2	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	250	100.0	100.0	39,410	100.0	100.0	236	100.0	100.0	40,316	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 2018 and 2019 Home Mortgage Lending By Income Level of Geography														
Assessment Area: Non-MSA - Wyoming and Genesee Counties														
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	1.5	0	0.0	1.1	0	0.0	3.6	0	0.0	2.2	1.4	
Middle	6	75.0	92.4	774	85.6	90.9	6	75.0	88.8	957	78.4	87.7	92.5	
Upper	2	25.0	6.1	130	14.4	8.0	2	25.0	7.6	263	21.6	10.1	6.0	
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	904	100.0	100.0	8	100.0	100.0	1,220	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	0.9	0	0.0	0.5	0	0.0	1.7	0	0.0	1.1	1.4	
Middle	39	83.0	91.0	3,816	80.6	89.2	20	76.9	89.8	2,435	80.2	88.0	92.5	
Upper	8	17.0	8.1	920	19.4	10.3	6	23.1	8.6	601	19.8	10.9	6.0	
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	47	100.0	100.0	4,736	100.0	100.0	26	100.0	100.0	3,036	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	0.7	0	0.0	0.3	0	0.0	0.8	0	0.0	0.2	1.4	
Middle	9	81.8	88.9	583	94.5	86.0	5	100.0	92.7	305	100.0	92.9	92.5	
Upper	2	18.2	10.5	34	5.5	13.7	0	0.0	6.5	0	0.0	6.9	6.0	
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	11	100.0	100.0	617	100.0	100.0	5	100.0	100.0	305	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		1.8
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0		84.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		13.7
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	1.2	0	0.0	0.9	0	0.0	2.6	0	0.0	1.7		1.4
Middle	54	81.8	91.8	5,173	82.7	90.4	31	79.5	89.6	3,697	81.1	88.5		92.5
Upper	12	18.2	7.1	1,084	17.3	8.7	8	20.5	7.8	864	18.9	9.8		6.0
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	66	100.0	100.0	6,257	100.0	100.0	39	100.0	100.0	4,561	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 15380 - Buffalo-Cheektowaga, 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	13	19.7	4.6	1,568	13.9	2.7	14	17.1	5.2	1,847	11.1	3.2	6.9
Moderate	13	19.7	10.5	1,406	12.5	7.1	13	15.9	11.5	2,221	13.3	8.0	11.4
Middle	22	33.3	45.7	4,006	35.6	40.6	27	32.9	46.5	4,252	25.5	41.9	43.8
Upper	18	27.3	39.2	4,261	37.9	49.5	28	34.1	36.6	8,375	50.2	46.8	37.9
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	66	100.0	100.0	11,241	100.0	100.0	82	100.0	100.0	16,695	100.0	100.0	100.0
Refinance Loans													
Low	6	5.9	2.1	499	3.6	1.3	3	3.5	2.5	371	3.1	1.5	6.9
Moderate	10	9.8	5.5	851	6.1	3.5	9	10.5	7.1	793	6.6	4.6	11.4
Middle	43	42.2	38.6	4,669	33.7	31.3	39	45.3	41.7	3,816	31.6	34.8	43.8
Upper	43	42.2	53.8	7,828	56.5	63.8	35	40.7	48.7	7,086	58.7	58.5	37.9
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0	0.0	0.6	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	102	100.0	100.0	13,847	100.0	100.0	86	100.0	100.0	12,066	100.0	100.0	100.0
Home Improvement Loans													
Low	7	26.9	4.7	438	26.8	3.7	0	0.0	4.8	0	0.0	3.3	6.9
Moderate	4	15.4	7.6	186	11.4	6.4	4	16.7	9.4	621	35.1	7.3	11.4
Middle	4	15.4	41.0	99	6.1	34.6	16	66.7	40.5	875	49.4	35.8	43.8
Upper	11	42.3	46.6	910	55.7	55.3	4	16.7	45.3	275	15.5	53.6	37.9
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	26	100.0	100.0	1,633	100.0	100.0	24	100.0	100.0	1,771	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	2	18.2	16.0	1,137	14.8	9.1	3	25.0	13.9	866	9.0	4.5	17.3
Moderate	4	36.4	18.0	1,704	22.1	8.2	3	25.0	19.9	1,729	18.0	9.2	12.8
Middle	3	27.3	40.2	2,143	27.8	33.6	4	33.3	40.3	6,143	64.1	38.2	39.5
Upper	2	18.2	23.7	2,715	35.3	43.3	2	16.7	24.2	844	8.8	42.1	29.1
Unknown	0	0.0	2.1	0	0.0	5.9	0	0.0	1.7	0	0.0	6.0	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	7,699	100.0	100.0	12	100.0	100.0	9,582	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	28	13.7	3.6	3,642	10.6	2.6	20	9.8	4.0	3,084	7.7	2.6	6.9
Moderate	31	15.1	8.3	4,147	12.0	5.7	29	14.2	9.4	5,364	13.4	6.8	11.4
Middle	72	35.1	42.0	10,917	31.7	35.9	86	42.2	43.8	15,086	37.6	38.5	43.8
Upper	74	36.1	46.1	15,714	45.7	55.4	69	33.8	42.8	16,580	41.3	51.3	37.9
Unknown	0	0.0	0.0	0	0.0	0.5	0	0.0	0.1	0	0.0	0.9	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	205	100.0	100.0	34,420	100.0	100.0	204	100.0	100.0	40,114	100.0	100.0	100.0

Source: 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 2020 and 2021 Home Mortgage Lending By Income Level of Geography														
Assessment Area: Non-MSA - Wyoming and Genesee Counties														
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	2.5	0	0.0	1.8	0	0.0	3.4	0	0.0	2.6	1.4	
Middle	4	57.1	90.2	748	74.7	89.5	5	50.0	91.3	734	49.5	90.7	92.5	
Upper	3	42.9	7.2	253	25.3	8.8	5	50.0	5.3	748	50.5	6.8	6.0	
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	7	100.0	100.0	1,001	100.0	100.0	10	100.0	100.0	1,482	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	1.4	0	0.0	0.9	0	0.0	1.2	0	0.0	1.1	1.4	
Middle	20	90.9	92.7	1,770	83.2	91.4	20	87.0	90.7	2,158	83.8	88.8	92.5	
Upper	2	9.1	5.9	358	16.8	7.7	3	13.0	8.0	418	16.2	10.1	6.0	
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	22	100.0	100.0	2,128	100.0	100.0	23	100.0	100.0	2,576	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	0.5	0	0.0	0.3	1.4	
Middle	6	100.0	93.9	301	100.0	90.4	4	66.7	93.2	176	87.6	90.1	92.5	
Upper	0	0.0	6.1	0	0.0	9.6	2	33.3	6.3	25	12.4	9.6	6.0	
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	6	100.0	100.0	301	100.0	100.0	6	100.0	100.0	201	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		1.8
Middle	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	171	100.0	100.0		84.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		13.7
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	171	100.0	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	1.7	0	0.0	1.2	0	0.0	2.2	0	0.0	1.9		1.4
Middle	30	85.7	91.7	2,819	82.2	90.5	30	75.0	91.4	3,239	73.1	90.1		92.5
Upper	5	14.3	6.6	611	17.8	8.2	10	25.0	6.4	1,191	26.9	8.0		6.0
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	35	100.0	100.0	3,430	100.0	100.0	40	100.0	100.0	4,430	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.														

Small Business Lending by Income Level of Geography

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 15380 - Buffalo-Cheektowaga, NY							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Low	4	6.3	10.1	219	2.5	9.2	9.3
Moderate	1	1.6	11.7	11	0.1	13.0	11.9
Middle	26	40.6	35.4	2,222	25.4	36.0	37.1
Upper	32	50.0	40.1	5,703	65.2	36.6	38.4
Unknown	1	1.6	2.6	595	6.8	5.2	3.3
Tract-Unk	0	0.0	0.2	0	0.0	0.0	
Total	64	100.0	100.0	8,750	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 - Wyoming and Genesee Counties							
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	5.2	0	0.0	6.3	4.9
Middle	2	40.0	91.3	145	29.7	92.3	89.6
Upper	3	60.0	3.1	342	70.1	1.3	5.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.4	0	0.0	0.0	
Total	5	100.0	100.0	488	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.

Home Mortgage Lending by Borrower Income Level

Distribution of 2015 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 15380 - Buffalo-Cheektowaga, NY							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	5	6.9	9.1	384	3.0	4.7	21.6
Moderate	6	8.3	23.6	657	5.2	16.8	17.1
Middle	14	19.4	22.1	2,012	15.8	20.9	20.3
Upper	26	36.1	27.7	6,700	52.6	40.7	41.0
Unknown	21	29.2	17.6	2,976	23.4	16.8	0.0
Total	72	100.0	100.0	12,729	100.0	100.0	100.0
Refinance Loans							
Low	3	5.6	6.8	315	4.3	3.8	21.6
Moderate	16	29.6	17.6	1,162	15.9	12.2	17.1
Middle	15	27.8	24.5	1,725	23.6	21.6	20.3
Upper	13	24.1	34.8	2,614	35.8	45.3	41.0
Unknown	7	13.0	16.3	1,484	20.3	17.1	0.0
Total	54	100.0	100.0	7,300	100.0	100.0	100.0
Home Improvement Loans							
Low	21	24.4	13.8	310	9.3	5.3	21.6
Moderate	25	29.1	25.9	941	28.3	15.4	17.1
Middle	23	26.7	23.8	1,033	31.1	23.3	20.3
Upper	12	14.0	32.2	522	15.7	50.0	41.0
Unknown	5	5.8	4.2	519	15.6	6.0	0.0
Total	86	100.0	100.0	3,325	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	29	13.7	8.9	1,009	4.3	4.5	21.6
Moderate	47	22.2	22.3	2,760	11.8	15.6	17.1
Middle	52	24.5	22.8	4,770	20.4	21.2	20.3
Upper	51	24.1	29.9	9,836	42.1	42.1	41.0
Unknown	33	15.6	16.1	4,979	21.3	16.6	0.0
Total	212	100.0	100.0	23,354	100.0	100.0	100.0
<p>Source: 2015 FFIEC Census Data 2006-2010 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 2015 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Non-MSA - Wyoming and Genesee Counties							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	4.0	6.3	126	3.2	4.0	16.0
Moderate	6	24.0	24.8	391	9.8	19.4	16.4
Middle	5	20.0	25.6	774	19.5	25.9	23.1
Upper	11	44.0	25.2	2,373	59.7	34.5	44.5
Unknown	2	8.0	18.2	310	7.8	16.2	0.0
Total	25	100.0	100.0	3,974	100.0	100.0	100.0
Refinance Loans							
Low	2	8.3	5.0	44	2.4	2.4	16.0
Moderate	3	12.5	19.6	231	12.8	15.2	16.4
Middle	9	37.5	27.7	528	29.2	23.4	23.1
Upper	9	37.5	35.0	995	55.0	43.5	44.5
Unknown	1	4.2	12.7	10	0.6	15.6	0.0
Total	24	100.0	100.0	1,808	100.0	100.0	100.0
Home Improvement Loans							
Low	5	11.4	9.0	87	7.0	4.9	16.0
Moderate	12	27.3	27.5	268	21.6	19.0	16.4
Middle	16	36.4	26.2	422	34.0	26.2	23.1
Upper	11	25.0	33.0	466	37.5	46.0	44.5
Unknown	0	0.0	4.3	0	0.0	3.9	0.0
Total	44	100.0	100.0	1,243	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	8	8.6	6.4	257	3.7	3.6	16.0
Moderate	21	22.6	23.9	890	12.7	18.2	16.4
Middle	30	32.3	26.3	1,724	24.5	25.2	23.1
Upper	31	33.3	29.2	3,834	54.6	37.7	44.5
Unknown	3	3.2	14.3	320	4.6	15.3	0.0
Total	93	100.0	100.0	7,025	100.0	100.0	100.0
<p>Source: 2015 FFIEC Census Data 2006-2010 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 2016 and 2017 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 15380 - Buffalo-Cheektowaga, 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	3	4.2	7.1	171	1.7	3.7	1	1.4	7.2	117	1.0	3.7	22.1
Moderate	6	8.5	21.8	542	5.5	15.3	9	13.0	20.8	1,014	8.6	14.6	16.5
Middle	7	9.9	23.0	1,339	13.6	21.4	9	13.0	21.6	1,737	14.7	20.0	19.9
Upper	25	35.2	31.2	4,663	47.4	44.0	16	23.2	31.3	3,263	27.6	43.7	41.6
Unknown	30	42.3	16.9	3,123	31.7	15.6	34	49.3	19.0	5,671	48.1	18.0	0.0
Total	71	100.0	100.0	9,838	100.0	100.0	69	100.0	100.0	11,802	100.0	100.0	100.0
Refinance Loans													
Low	7	14.6	5.6	507	8.3	2.9	15	22.7	7.2	1,225	13.4	3.6	22.1
Moderate	8	16.7	14.4	860	14.1	10.4	9	13.6	17.4	651	7.1	11.3	16.5
Middle	12	25.0	22.9	1,405	23.0	20.2	14	21.2	24.2	1,822	19.9	19.5	19.9
Upper	15	31.3	37.5	2,621	42.9	48.3	18	27.3	37.6	2,618	28.6	42.8	41.6
Unknown	6	12.5	19.5	715	11.7	18.3	10	15.2	13.6	2,849	31.1	22.8	0.0
Total	48	100.0	100.0	6,108	100.0	100.0	66	100.0	100.0	9,165	100.0	100.0	100.0
Home Improvement Loans													
Low	21	17.1	11.6	448	8.1	4.2	13	15.1	12.0	391	12.6	4.7	22.1
Moderate	35	28.5	24.0	1,126	20.4	13.8	21	24.4	22.0	375	12.1	12.9	16.5
Middle	28	22.8	22.4	1,078	19.5	18.6	25	29.1	23.5	903	29.1	23.1	19.9
Upper	31	25.2	38.3	2,270	41.0	56.7	20	23.3	38.1	1,061	34.2	54.4	41.6
Unknown	8	6.5	3.6	609	11.0	6.7	7	8.1	4.4	368	11.9	5.0	0.0
Total	123	100.0	100.0	5,531	100.0	100.0	86	100.0	100.0	3,098	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	31	12.8	7.1	1,126	5.2	3.5	29	13.1	7.6	1,733	7.2	3.7	22.1
Moderate	49	20.2	20.0	2,528	11.8	14.0	39	17.6	20.1	2,040	8.5	13.7	16.5
Middle	47	19.4	22.9	3,822	17.8	21.0	48	21.7	22.4	4,462	18.5	19.9	19.9
Upper	71	29.3	33.5	9,554	44.5	45.5	54	24.4	33.4	6,942	28.8	43.8	41.6
Unknown	44	18.2	16.5	4,447	20.7	16.0	51	23.1	16.4	8,888	36.9	18.9	0.0
Total	242	100.0	100.0	21,477	100.0	100.0	221	100.0	100.0	24,065	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 2016 and 2017 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA - Wyoming and Genesee Counties													
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	6.3	0	0.0	3.7	2	14.3	6.3	111	6.1	4.0	16.9
Moderate	1	7.1	21.9	60	2.6	17.4	2	14.3	24.5	193	10.6	20.4	17.0
Middle	4	28.6	28.5	491	21.6	28.6	8	57.1	24.7	1,051	57.7	24.4	23.1
Upper	9	64.3	25.1	1,727	75.8	33.2	2	14.3	22.5	466	25.6	29.9	43.0
Unknown	0	0.0	18.2	0	0.0	17.1	0	0.0	22.0	0	0.0	21.2	0.0
Total	14	100.0	100.0	2,278	100.0	100.0	14	100.0	100.0	1,821	100.0	100.0	100.0
Refinance Loans													
Low	3	18.8	4.8	212	10.6	2.8	2	9.5	6.5	231	9.1	4.7	16.9
Moderate	1	6.3	17.0	87	4.4	13.9	6	28.6	19.9	632	24.9	15.4	17.0
Middle	3	18.8	25.5	376	18.9	23.3	6	28.6	30.5	567	22.3	28.6	23.1
Upper	9	56.3	36.1	1,317	66.1	42.9	6	28.6	32.1	1,073	42.2	37.9	43.0
Unknown	0	0.0	16.6	0	0.0	17.2	1	4.8	11.0	38	1.5	13.5	0.0
Total	16	100.0	100.0	1,992	100.0	100.0	21	100.0	100.0	2,541	100.0	100.0	100.0
Home Improvement Loans													
Low	7	19.4	9.8	174	15.1	4.3	8	17.0	10.1	332	11.6	6.1	16.9
Moderate	10	27.8	22.1	527	45.6	20.6	9	19.1	21.5	373	13.0	18.6	17.0
Middle	8	22.2	27.7	262	22.7	22.6	16	34.0	27.8	765	26.7	20.0	23.1
Upper	11	30.6	38.9	193	16.7	52.0	13	27.7	36.5	1,351	47.2	49.3	43.0
Unknown	0	0.0	1.4	0	0.0	0.5	1	2.1	4.2	40	1.4	6.0	0.0
Total	36	100.0	100.0	1,156	100.0	100.0	47	100.0	100.0	2,861	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	10	15.2	6.4	386	7.1	3.5	12	14.6	6.9	674	9.3	4.3	16.9
Moderate	12	18.2	20.7	674	12.4	16.7	17	20.7	22.8	1,198	16.6	18.9	17.0
Middle	15	22.7	27.6	1,129	20.8	26.9	30	36.6	26.8	2,383	33.0	25.3	23.1
Upper	29	43.9	29.9	3,237	59.7	36.8	21	25.6	27.3	2,890	40.0	33.2	43.0
Unknown	0	0.0	15.4	0	0.0	16.1	2	2.4	16.3	78	1.1	18.2	0.0
Total	66	100.0	100.0	5,426	100.0	100.0	82	100.0	100.0	7,223	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 15380 - Buffalo-Cheektowaga, 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	3	3.2	9.1	473	2.6	5.0	8	7.7	8.7	873	5.3	5.0	22.1
Moderate	8	8.4	25.3	1,072	5.9	18.5	5	4.8	24.7	512	3.1	18.3	16.5
Middle	10	10.5	22.8	1,922	10.6	21.4	14	13.5	22.6	2,393	14.5	21.4	19.9
Upper	30	31.6	31.3	8,343	45.9	43.2	16	15.4	30.3	4,290	25.9	41.3	41.6
Unknown	44	46.3	11.5	6,372	35.0	11.9	61	58.7	13.8	8,464	51.2	13.9	0.0
Total	95	100.0	100.0	18,182	100.0	100.0	104	100.0	100.0	16,532	100.0	100.0	100.0
Refinance Loans													
Low	17	14.0	10.6	1,424	9.4	6.5	10	11.5	9.2	518	4.0	5.1	22.1
Moderate	20	16.5	20.3	2,068	13.7	15.2	15	17.2	20.3	1,374	10.7	14.4	16.5
Middle	29	24.0	25.8	3,012	20.0	23.6	18	20.7	23.7	2,462	19.1	20.8	19.9
Upper	26	21.5	36.0	5,211	34.6	46.8	25	28.7	37.7	5,224	40.5	48.8	41.6
Unknown	29	24.0	7.3	3,358	22.3	7.8	19	21.8	9.1	3,308	25.7	10.9	0.0
Total	121	100.0	100.0	15,073	100.0	100.0	87	100.0	100.0	12,886	100.0	100.0	100.0
Home Improvement Loans													
Low	4	12.9	9.0	52	2.3	6.5	3	10.0	10.9	63	2.4	7.6	22.1
Moderate	2	6.5	18.5	67	2.9	14.7	6	20.0	18.5	156	6.1	14.9	16.5
Middle	9	29.0	26.5	481	20.9	23.4	8	26.7	26.6	661	25.7	23.8	19.9
Upper	6	19.4	40.3	450	19.5	49.8	7	23.3	39.1	1,104	42.9	48.2	41.6
Unknown	10	32.3	5.7	1,253	54.4	5.5	6	20.0	4.9	589	22.9	5.5	0.0
Total	31	100.0	100.0	2,303	100.0	100.0	30	100.0	100.0	2,573	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	24	9.7	9.3	1,949	5.5	5.5	21	9.5	9.0	1,454	4.5	5.1	22.1
Moderate	30	12.1	22.3	3,207	9.0	17.1	26	11.8	22.0	2,042	6.4	16.7	16.5
Middle	48	19.4	23.5	5,415	15.2	21.7	40	18.1	23.0	5,516	17.2	21.1	19.9
Upper	62	25.1	33.6	14,004	39.4	44.3	48	21.7	33.5	10,618	33.2	43.8	41.6
Unknown	83	33.6	11.2	10,983	30.9	11.4	86	38.9	12.5	12,361	38.6	13.3	0.0
Total	247	100.0	100.0	35,558	100.0	100.0	221	100.0	100.0	31,991	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 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA - Wyoming and Genesee Counties													
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	1	12.5	4.5	70	7.7	2.6	0	0.0	4.3	0	0.0	2.9	16.9
Moderate	3	37.5	26.6	335	37.1	20.5	3	37.5	22.9	451	37.0	17.9	17.0
Middle	4	50.0	24.0	499	55.2	22.8	2	25.0	26.6	280	23.0	26.2	23.1
Upper	0	0.0	28.3	0	0.0	37.4	2	25.0	26.2	339	27.8	33.5	43.0
Unknown	0	0.0	16.6	0	0.0	16.6	1	12.5	20.1	150	12.3	19.5	0.0
Total	8	100.0	100.0	904	100.0	100.0	8	100.0	100.0	1,220	100.0	100.0	100.0
Refinance Loans													
Low	6	12.8	9.3	260	5.5	6.2	5	19.2	7.6	363	12.0	4.8	16.9
Moderate	7	14.9	19.2	569	12.0	15.7	5	19.2	17.5	442	14.6	14.1	17.0
Middle	14	29.8	31.1	1,374	29.0	29.4	5	19.2	28.6	663	21.8	26.9	23.1
Upper	19	40.4	36.1	2,273	48.0	44.5	11	42.3	39.3	1,568	51.6	46.8	43.0
Unknown	1	2.1	4.3	260	5.5	4.1	0	0.0	6.9	0	0.0	7.4	0.0
Total	47	100.0	100.0	4,736	100.0	100.0	26	100.0	100.0	3,036	100.0	100.0	100.0
Home Improvement Loans													
Low	1	9.1	6.5	220	35.7	7.8	0	0.0	7.3	0	0.0	4.4	16.9
Moderate	4	36.4	22.2	142	23.0	18.1	1	20.0	18.5	120	39.3	14.4	17.0
Middle	5	45.5	29.4	185	30.0	31.9	1	20.0	25.8	15	4.9	20.6	23.1
Upper	1	9.1	39.2	70	11.3	37.9	3	60.0	46.0	170	55.7	58.9	43.0
Unknown	0	0.0	2.6	0	0.0	4.3	0	0.0	2.4	0	0.0	1.8	0.0
Total	11	100.0	100.0	617	100.0	100.0	5	100.0	100.0	305	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	12.1	6.1	550	8.8	3.8	5	12.8	5.5	363	8.0	3.4	16.9
Moderate	14	21.2	23.0	1,046	16.7	18.8	9	23.1	20.0	1,013	22.2	16.3	17.0
Middle	23	34.8	26.3	2,058	32.9	24.4	8	20.5	26.4	958	21.0	25.6	23.1
Upper	20	30.3	32.1	2,343	37.4	39.5	16	41.0	32.0	2,077	45.5	38.0	43.0
Unknown	1	1.5	12.5	260	4.2	13.5	1	2.6	16.2	150	3.3	16.7	0.0
Total	66	100.0	100.0	6,257	100.0	100.0	39	100.0	100.0	4,561	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 15380 - Buffalo-Cheektowaga, 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	4	6.1	8.6	559	5.0	4.9	5	6.1	9.0	861	5.2	5.3	22.2
Moderate	9	13.6	26.1	1,780	15.8	19.9	8	9.8	24.3	1,531	9.2	18.7	16.6
Middle	12	18.2	21.8	2,080	18.5	20.7	12	14.6	21.6	2,466	14.8	20.7	20.3
Upper	15	22.7	28.9	3,048	27.1	39.8	22	26.8	28.6	6,228	37.3	39.3	40.9
Unknown	26	39.4	14.6	3,774	33.6	14.7	35	42.7	16.5	5,609	33.6	16.1	0.0
Total	66	100.0	100.0	11,241	100.0	100.0	82	100.0	100.0	16,695	100.0	100.0	100.0
Refinance Loans													
Low	13	12.7	5.0	1,193	8.6	2.4	13	15.1	6.8	1,009	8.4	3.7	22.2
Moderate	14	13.7	15.8	1,715	12.4	10.2	17	19.8	18.5	2,023	16.8	12.9	16.6
Middle	19	18.6	24.6	1,641	11.9	20.7	19	22.1	25.5	2,700	22.4	22.6	20.3
Upper	24	23.5	44.0	4,727	34.1	54.7	16	18.6	38.9	3,305	27.4	48.9	40.9
Unknown	32	31.4	10.7	4,571	33.0	12.0	21	24.4	10.3	3,029	25.1	11.9	0.0
Total	102	100.0	100.0	13,847	100.0	100.0	86	100.0	100.0	12,066	100.0	100.0	100.0
Home Improvement Loans													
Low	1	3.8	8.6	12	0.7	6.2	3	12.5	9.0	56	3.2	6.4	22.2
Moderate	6	23.1	18.3	309	18.9	14.4	6	25.0	19.7	318	18.0	15.5	16.6
Middle	5	19.2	24.1	282	17.3	22.6	6	25.0	23.8	296	16.7	22.3	20.3
Upper	8	30.8	42.7	652	39.9	49.8	5	20.8	42.7	281	15.9	50.2	40.9
Unknown	6	23.1	6.3	378	23.1	7.0	4	16.7	4.9	820	46.3	5.6	0.0
Total	26	100.0	100.0	1,633	100.0	100.0	24	100.0	100.0	1,771	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	18	9.3	6.7	1,764	6.6	3.7	21	10.9	7.9	1,926	6.3	4.6	22.2
Moderate	29	14.9	19.9	3,804	14.2	14.8	31	16.1	20.9	3,872	12.7	15.8	16.6
Middle	36	18.6	22.4	4,003	15.0	20.2	37	19.3	23.3	5,462	17.9	21.5	20.3
Upper	47	24.2	35.9	8,427	31.5	46.4	43	22.4	34.3	9,814	32.1	43.9	40.9
Unknown	64	33.0	15.2	8,723	32.6	14.9	60	31.3	13.6	9,458	31.0	14.2	0.0
Total	194	100.0	100.0	26,721	100.0	100.0	192	100.0	100.0	30,532	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 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA - Wyoming and Genesee Counties													
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	1	14.3	5.8	87	8.7	3.5	0	0.0	5.3	0	0.0	3.2	16.9
Moderate	0	0.0	23.4	0	0.0	18.4	2	20.0	25.0	300	20.2	19.6	17.0
Middle	3	42.9	27.4	502	50.1	27.2	4	40.0	27.3	664	44.8	26.8	23.1
Upper	3	42.9	25.5	412	41.2	33.2	3	30.0	24.0	306	20.6	32.5	43.0
Unknown	0	0.0	18.0	0	0.0	17.6	1	10.0	18.4	212	14.3	17.9	0.0
Total	7	100.0	100.0	1,001	100.0	100.0	10	100.0	100.0	1,482	100.0	100.0	100.0
Refinance Loans													
Low	1	4.5	2.5	73	3.4	1.5	2	8.7	4.2	100	3.9	2.4	16.9
Moderate	4	18.2	15.3	438	20.6	11.0	6	26.1	18.4	510	19.8	13.9	17.0
Middle	5	22.7	29.7	256	12.0	25.9	9	39.1	28.3	707	27.4	25.7	23.1
Upper	11	50.0	44.3	1,340	63.0	51.9	3	13.0	39.2	289	11.2	46.1	43.0
Unknown	1	4.5	8.2	21	1.0	9.6	3	13.0	9.9	970	37.7	11.9	0.0
Total	22	100.0	100.0	2,128	100.0	100.0	23	100.0	100.0	2,576	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.8	0	0.0	5.3	0	0.0	4.9	0	0.0	4.2	16.9
Moderate	0	0.0	13.6	0	0.0	14.3	1	16.7	19.5	65	32.3	15.4	17.0
Middle	4	66.7	30.6	206	68.4	27.9	2	33.3	34.1	55	27.4	33.5	23.1
Upper	2	33.3	45.6	95	31.6	49.3	3	50.0	38.0	81	40.3	43.1	43.0
Unknown	0	0.0	3.4	0	0.0	3.2	0	0.0	3.4	0	0.0	3.7	0.0
Total	6	100.0	100.0	301	100.0	100.0	6	100.0	100.0	201	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	5.7	4.3	160	4.7	2.6	2	5.1	5.0	100	2.3	3.0	16.9
Moderate	4	11.4	18.3	438	12.8	14.7	9	23.1	21.1	875	20.5	16.8	17.0
Middle	12	34.3	27.2	964	28.1	25.7	15	38.5	28.0	1,426	33.5	26.4	23.1
Upper	16	45.7	33.6	1,847	53.8	40.5	9	23.1	31.3	676	15.9	38.2	43.0
Unknown	1	2.9	16.6	21	0.6	16.5	4	10.3	14.7	1,182	27.8	15.6	0.0
Total	35	100.0	100.0	3,430	100.0	100.0	39	100.0	100.0	4,259	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 Revenue Size of Business

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 15380 - Buffalo-Cheektowaga, NY							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	33	51.6	43.1	3,446	39.4	24.5	89.1
Over \$1 Million	11	17.2		1,477	16.9		9.8
Revenue Unknown	20	31.3		3,826	43.7		1.1
Total	64	100.0		8,750	100.0		100.0
By Loan Size							
\$100,000 or Less	40	62.5	89.5	1,662	19.0	32.1	
\$100,001 - \$250,000	14	21.9	5.9	2,504	28.6	19.7	
\$250,001 - \$1 Million	10	15.6	4.6	4,584	52.4	48.2	
Total	64	100.0	100.0	8,750	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	23	69.7		819	23.8		
\$100,001 - \$250,000	7	21.2		1,217	35.3		
\$250,001 - \$1 Million	3	9.1		1,410	40.9		
Total	33	100.0		3,446	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 - Wyoming and Genesee Counties							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	4	80.0	52.1	165	33.8	34.8	87.8
Over \$1 Million	1	20.0		323	66.2		9.4
Revenue Unknown	0	0.0		0	0.0		2.8
Total	5	100.0		488	100.0		100.0
By Loan Size							
\$100,000 or Less	4	80.0	88.2	165	33.8	34.6	
\$100,001 - \$250,000	0	0.0	7.3	0	0.0	21.8	
\$250,001 - \$1 Million	1	20.0	4.5	323	66.2	43.5	
Total	5	100.0	100.0	488	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	4	100.0		165	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	4	100.0		165	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.

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-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) 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 LMI 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.

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.

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 refinancings 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.

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

Metropolitan Statistical Area (“MSA”): A geographic entity defined by the federal Office of Management and Budget for use by federal statistical agencies, based on the concept of a core area with a large population nucleus, plus adjacent communities having a high degree of economic and social integration with that core.

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

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

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.

Small loan(s) to business(es): A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (“Call Report”) 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.

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