

# **PUBLIC DISCLOSURE**

May 22, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Manufacturers and Traders Trust Company  
RSSD No. 501105

One M&T Plaza  
Buffalo, NY 14203

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

### INSTITUTION'S CRA RATING: OUTSTANDING

*The following table indicates the performance level of Manufacturers and Traders Trust Company with respect to the lending, investment, and service tests.*

#### PERFORMANCE TEST RATINGS TABLE

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

#### SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the institution's rating include:

##### LENDING TEST

- Lending levels reflected excellent responsiveness to the assessment areas' credit needs.
- A high percentage of loans were made in the bank's assessment areas.
- The geographic distribution of loans reflected good penetration throughout the assessment areas.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an excellent record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.

- Made extensive use of innovative and/or flexible lending practices in serving assessment areas' credit needs.

#### INVESTMENT TEST

- Made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors.
- Exhibited good responsiveness to credit and community development needs.
- Made significant use of innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were reasonably accessible to essentially all portions of the bank's assessment areas.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to low- and moderate-income ("LMI") geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment areas, particularly LMI geographies and/or LMI individuals.
- Provided a relatively high level of community development services.

## INSTITUTION

### DESCRIPTION OF INSTITUTION

Manufacturers and Traders Trust Company (“M&T” or “the bank”) is a state-member, full-service interstate bank headquartered in Buffalo, New York, with total assets of \$154.6 billion as of December 31, 2021. The bank is a wholly-owned subsidiary of M&T Bank Corporation, a publicly owned bank holding company. Relevant to this evaluation, M&T operated two subsidiaries during the review period: 1) M&T Realty Capital Corporation, which offers multifamily lending and provides loan servicing to purchasers of the loans it originates; and 2) M&T Real Estate Trust, which originates commercial real estate mortgages and provides loan servicing to M&T.

As of December 31, 2021, M&T operated 664 offices, including its main office, and 1,882 automated teller machines (“ATM”), spanning from Maine to Virginia; a commercial banking office in Ontario, Canada; and an office in George Town, Cayman Islands, providing limited commercial banking services. The bank offers a range of deposit and lending products.

M&T provides consumers and small businesses with a variety of traditional lending and deposit products and services through several delivery channels including traditional banking offices, ATMs, telephone banking, and internet banking. Consumer loan products include residential mortgages, home equity loans and lines, indirect and direct automobile loans, credit cards, personal loans, student loans, overdraft lines of credit, and credit card debt cancellation products. M&T also offers construction lending and commercial loan products, including loans and lines of credit, business credit cards, and small business loans. Deposit products include personal checking and savings accounts, and commercial checking, and savings accounts.

Based on the December 31, 2021, Federal Financial Institutions Examination Council (“FFIEC”) Consolidated Report of Condition and Income (“Call Report”), M&T’s loan portfolio by dollar volume consisted of a mix of residential real estate and commercial loans as summarized in the following table:

<b>Loan Portfolio</b>		
<b>Loan Type</b>	<b>\$(000s)</b>	<b>%</b>
1-4 Family Residential Real Estate	17,438,789	19.0%
Construction, Land Development, and Other Land Loans	7,784,432	8.5%
Multifamily (5 or more units) Residential Real Estate	3,880,186	4.2%
Home Equity Line of Credit	3,544,395	3.9%
Consumer	14,411,192	15.7%
Agricultural Production and Other Loans to Farmers	188,780	0.2%
Commercial & Industrial	18,038,782	19.7%
Nonfarm Nonresidential Secured	21,563,642	23.5%
Other	4,827,734	5.3%
<b>Total Loans</b>	<b>91,677,932</b>	<b>100.0%</b>
<i>Source: Consolidated Report of Condition and Income as of December 31, 2021.</i>		

Based on the December 31, 2021, Uniform Bank Performance Report (“UBPR”), M&T’s deposit portfolio by dollar volume was comprised primarily of money market deposit accounts and demand deposit accounts as summarized in the following table:

<b>Deposit Portfolio</b>		
<b>Deposit Type</b>	<b>\$(000s)</b>	<b>%</b>
Demand Deposits	36,457,271	26.7%
All NOW and ATS	325,553	0.2%
Money Market Deposits	82,288,832	60.3%
Other Savings Deposits	11,813,152	8.7%
Time Deposits at or below Insurance Limit	2,455,644	1.8%
Time Deposits Above Insurance Limit	345,188	0.3%
Brokered Deposits	2,841,718	2.1%
<b>Total Deposits</b>	<b>136,527,358</b>	<b>100.0%</b>

*Source: Uniform Bank Performance Report as of December 31, 2021.*

### DESCRIPTION OF ASSESSMENT AREAS

M&T's assessment areas have remained the same since the previous evaluation, with the exception of the Massachusetts assessment area, where Plymouth County was added to the Metropolitan Division due to the 2020 MSA OMB changes, and the bank excluded Plymouth County from its assessment area. As of December 31, 2021, M&T had a total of 50 assessment areas as listed below:

<b>Assessment Areas</b>		
	<b>Multistate</b>	<b>Review Scope</b>
1	MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	Full
2	MSA 19060 (Cumberland, MD-WV)	Full
3	MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)	Full
	MD 35004 (Nassau County-Suffolk County, NY)	
	MD 35084 (Newark, NJ-PA)	
	MD 35154 (New Brunswick-Lakewood, NJ)	
	MD 35614 (New York-Jersey-City White Plains, NY-NJ)	
4	MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)	Full
	MD 33874 (Montgomery Co-Bucks Co-Chester Co, PA)	
	MD 37964 (Philadelphia, PA)	
	MD 15804 (Camden, NJ)	
	MD 48864 (Wilmington, DE-MD-NJ)	
5	MSA 41540 (Salisbury, MD-DE)	Full
6	MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	Full
	MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	
	MD 23224 (Frederick-Gaithersburg-Rockville, MD)	
	<b>State of Connecticut</b>	
7	MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	Full
	<b>State of Delaware</b>	
8	MSA 20100 (Dover, DE)	Full
	<b>State of Florida</b>	
9	MSA 38940 (Port St. Lucie, FL)	Limited
10	MSA 42680 (Sebastian-Vero Beach, FL)	Limited



11	MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	Full
	<b>State of Maryland</b>	
12	MSA 12580 (Baltimore-Columbia-Towson, MD)	Full
13	MSA 15680 (California-Lexington Park, MD)	Limited
14	MSA 25180 (Hagerstown-Martinsburg, MD)	Limited
15	Non-Metropolitan Group A	Limited
16	Non-Metropolitan Group B	Limited
	<b>State of Massachusetts</b>	
17	MD 14454 (Boston, MA)	Full
	<b>State of New Jersey</b>	
18	MSA 45940 (Trenton-Princeton, NJ)	Full
	<b>State of New York</b>	
19	MSA 10580 (Albany-Schenectady-Troy, NY)	Full
20	MSA 13780 (Binghamton, NY)	Limited
21	MSA 15380 (Buffalo-Cheektowaga, NY)	Full
22	MSA 21300 (Elmira, NY)	Limited
23	MSA 27060 (Ithaca, NY)	Limited
24	MSA 28740 (Kingston, NY)	Limited
25	MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	Limited
26	MSA 40380 (Rochester, NY)	Full
27	MSA 45060 (Syracuse, NY)	Limited
28	MSA 46540 (Utica-Rome, NY)	Limited
29	MSA 48060 (Watertown-Ft. Drum, NY)	Limited
30	Non-MSA Group A	Limited
31	Non-MSA Group B	Limited
32	Non-MSA Group C	Limited
	<b>State of Pennsylvania</b>	
33	MSA 11020 (Altoona, PA)	Limited
34	MSA 14100 (Bloomsburg-Berwick, PA)	Limited
35	MSA 16540 (Chambersburg-Waynesboro, PA)	Limited
36	MSA 20700 (East Stroudsburg, PA)	Limited
37	MSA 23900 (Gettysburg, PA)	Limited
38	MSA 25420 (Harrisburg-Carlisle, PA)	Full
39	MSA 29540 (Lancaster, PA)	Limited
40	MSA 30140 (Lebanon, PA)	Limited
41	MSA 39740 (Reading, PA)	Limited
42	MSA 42540 (Scranton-Wilkes Barre, PA)	Limited
43	MSA 44300 (State College, PA)	Limited
44	MSA 48700 (Williamsport, PA)	Limited
45	MSA 49620 (York-Hanover, PA)	Full
46	Non-MSA Group A	Limited
47	Non-MSA Group B	Limited
48	Non-MSA Group C	Limited

49	Non-MSA Group D	Limited
	<b>State of Virginia</b>	
50	MSA 40060 (Richmond, VA)	Full

M&T’s assessment areas were in compliance with the requirements of Section 228.41 of Regulation BB. There were no financial or legal factors that would prevent the bank from fulfilling its responsibilities under the Community Reinvestment Act (“CRA”).

## PREVIOUS PUBLIC EVALUATION

The Federal Reserve Bank of New York (“FRBNY”) assigned a rating of “Outstanding” at the prior CRA Performance Evaluation dated September 8, 2020. The Lending Test was rated High Satisfactory, the Investment Test was rated Outstanding, and the Service Test was rated Outstanding.

## SCOPE OF EXAMINATION

### Procedures

M&T’s CRA performance was reviewed using the FFIEC Interagency CRA Procedures for Large Institutions. These procedures include the lending, investment, and service tests. 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.

### Products

During this evaluation, loans reportable under the Home Mortgage Disclosure Act (“HMDA”), as well as small business loans, subject to CRA data reporting requirements were analyzed as these loan types represented the bank’s major product lines based on a review of bank records, business strategy, and loan portfolio composition. HMDA-reportable loans included home purchase and home improvement loans, and refinance loans on 1-4 family, and multifamily (five or more units) properties. The small business loans included commercial real estate loans, commercial and industrial loans, and lines of credit in amounts of \$1 million or less. Small farm loans were excluded from the evaluation because there was insufficient volume to conduct a meaningful analysis. Examiners verified the integrity of HMDA and small business data reported for the years 2019, 2020, and 2021. Examiners also analyzed community development loans, investments, and services. Multifamily loans qualifying as community development loans were also considered in the evaluation of community development lending.

### Evaluation Period

Examiners reviewed the bank’s small business loans and home mortgage loans originated or purchased between January 1, 2019, through December 31, 2021. The evaluation of the bank’s community development loans, qualified investments, philanthropic grants, and community development services included all qualified activities from January 1, 2020, through December 31, 2021. The investment test included investments and grants made during the current evaluation period and the current book value of any qualified investments outstanding from the prior evaluation.

### Lending Analysis

Under the lending test, borrower and geographic loan distribution analyses included only loans originated or purchased inside the assessment areas. The bank’s record of small business lending was compared to

2019, 2020, and 2021 Dun & Bradstreet (“D&B”) demographic data and aggregate small business loan data for 2019, 2020, and 2021. The bank’s HMDA lending was compared to the 2015 American Community Survey (“ACS”) demographic data and to the aggregate HMDA data for 2019, 2020, and 2021. Aggregate lenders included all lenders required to report HMDA-reportable and CRA small business lending data within the assessment areas. For retail services, M&T’s branch distribution analysis was conducted using data as of December 31, 2021.

To evaluate the geographic distribution, the proportion of home purchase and refinance loan originations located in LMI geographies was compared to the proportion of owner-occupied housing units located in LMI geographies. Multifamily loan originations located in LMI geographies were compared to the proportion of multifamily (rental) housing units located in LMI geographies. For small business loans, the analysis compared the proportion of loan originations located in LMI geographies with the proportion of businesses located in LMI geographies, based on D&B data. Performance in low-income and in moderate-income geographies were analyzed separately. The lending analysis also considered lending opportunities in LMI census tracts as indicated by demographic data and aggregate lending patterns.

To analyze the distribution of HMDA-related loans by borrower profile, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the respective assessment areas. Median family income (“MFI”) estimates from the FFIEC were used to categorize borrower income. For small business lending, the analysis compared the proportion of loans to businesses with gross annual revenues (“GAR”) of \$1 million or less, based on D&B data, 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 small businesses.

### **Community Development Activity Analysis**

Community development activities were reviewed to determine whether activities had community development as a primary purpose and whether the community development activities benefited the bank’s assessment areas or the broader statewide or regional area (“BSRA”) that included the assessment area. In addition, pursuant to CA Letter 21-5: CRA Consideration for Activities in Response to the Coronavirus, qualified community development activities supporting community needs related to the COVID-19 pandemic located outside of the assessment area or BSRA were also given consideration. The eligibility of a loan, investment, or service as a community development activity was based on demographic information at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

### **Deriving Overall Conclusions**

Examiners conducted full-scope reviews for 18 out of the 50 assessment areas. In determining the overall rating, examiners weighted the areas based on the area’s concentration of deposits, branches, and ATMs, and overall lending activity. Thus, M&T’s performance in the New York, Maryland, Pennsylvania, and multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment areas received more weight. The remaining assessment areas did not have a substantial effect on the overall rating based on lower deposit, lending volumes, and market presence. Demographic and economic information also impacted M&T’s performance context and is discussed in detail within each full-scope assessment area. In reaching a conclusion about M&T’s overall performance within an individual assessment area, products were weighted based on their volume in that area.

## **Community Contact**

To understand community development and credit needs, community contact interviews with community-based organizations were conducted throughout the bank's assessment areas. These organizations had expertise in their respective fields and were familiar with the economic, social, and demographic characteristics and community development opportunities in each assessment area. Information obtained from these interviews helped establish a performance context for the communities in which the bank operated. Please refer to the Community Contacts section within each individual assessment area for more details.

## **Other Information**

In 2020, M&T received two CRA comment letters: 1) Greater Rochester Community Reinvestment Coalition, which is a coalition of local non-profits that analyze bank lending data to help identify and discuss those bank's strengths and weaknesses; and 2) HomeSave Coalition, a coalition comprised of non-profit housing counseling, legal services, and tenant advocacy organizations providing services in the Capital Region and Northeastern New York. Both letters expressed a positive sentiment of M&T's lending and ongoing involvement in their local communities. For additional information, please refer to the comment letters, which are maintained in M&T's CRA public file.

## **CONCLUSION WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

M&T's overall performance under the Lending Test is rated Outstanding. Lending levels reflected excellent responsiveness to the assessment areas' credit needs. A high percentage of loans were made in the bank's assessment areas. The geographic distribution of loans reflected good penetration throughout the assessment areas. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited an excellent record of serving the credit needs of low-income individuals and areas and very small businesses. The bank was a leader in making community development loans. The bank made extensive use innovative and/or flexible lending practices in serving assessment areas' credit needs.

### **Lending Activity**

M&T's lending activity demonstrated excellent responsiveness to the retail credit needs of the assessment areas. This conclusion was primarily based on the bank's excellent responsiveness in the New York State rated assessment areas and the Multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment area, and a good responsiveness in the Maryland and Pennsylvania rated assessment areas.

The bank's lending is summarized in the table below.

<b>Summary of Institution Lending Activity January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	12,431	16.1%	1,046,316	4.5%
Home Purchase	27,580	35.8%	6,949,158	30.1%
Loan Purpose Not Applicable	7,409	9.6%	1,527,584	6.6%
Multi-Family	616	0.8%	6,560,824	28.4%
Refinancing	28,951	37.6%	7,031,941	30.4%
<b>Total HMDA</b>	<b>76,987</b>	<b>45.9%</b>	<b>23,115,823</b>	<b>70.9%</b>
<b>Total Small Business</b>	<b>90,649</b>	<b>54.1%</b>	<b>9,491,875</b>	<b>29.1%</b>
<b>Total Small Farm</b>	<b>69</b>	<b>0.0</b>	<b>18,187</b>	<b>0.1%</b>
<b>TOTAL LOANS</b>	<b>167,705</b>	<b>100.0%</b>	<b>32,625,885</b>	<b>100.0%</b>

### Assessment Area Concentration

M&T originated a high percentage of its loans by both dollar and number within its combined assessment areas. As shown in the subsequent table, the bank displayed a stronger performance in small business lending, by number, with 97.6% of such loans extended within the combined assessment areas. This performance was due, in part, to the bank's volume of Small Business Administration ("SBA") Paycheck Protection Program ("PPP") lending. The bank's overall performance was 84.1% by number and 71.8% by dollar within the assessment areas. Examiners assessed the bank's performance under this factor at the institution level only.

The bank's lending inside and outside of the assessment areas is summarized in the table below.

<b>Lending Inside and Outside the Assessment Areas January 1, 2019 to December 31, 2021</b>								
<b>Loan Types</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Improvement	12,431	96.6%	1,046,316	96.0%	434	3.4%	43,616	4.0%
Home Purchase	27,580	85.7%	6,949,158	83.9%	4,593	14.3%	1,337,811	16.1%
Loan Purpose Not Applicable	7,409	36.1%	1,527,584	41.8%	13,134	63.9%	2,123,618	58.2%
Multi-Family Housing	616	66.8%	6,560,824	50.6%	306	33.2%	6,417,541	49.4%
Refinancing	28,951	72.6%	7,031,941	73.9%	10,936	27.4%	2,485,828	26.1%
<b>Total HMDA</b>	<b>76,987</b>	<b>72.4%</b>	<b>23,115,823</b>	<b>65.1%</b>	29,403	<b>27.6%</b>	12,408,414	<b>34.9%</b>
<b>Total Small Business</b>	<b>90,649</b>	<b>97.6%</b>	<b>9,491,875</b>	<b>95.8%</b>	2,246	<b>2.4%</b>	411,410	<b>4.2%</b>
<b>Total Small Farm</b>	<b>69</b>	<b>89.6%</b>	<b>18,187</b>	<b>88.7%</b>	8	<b>10.4%</b>	2,328	<b>11.3%</b>
<b>TOTAL LOANS</b>	<b>167,705</b>	<b>84.1%</b>	<b>32,625,885</b>	<b>71.8%</b>	31,657	<b>15.9%</b>	12,822,152	<b>28.2%</b>

### Geographic Distribution of Loans

M&T's geographic distribution of loans reflected good penetration throughout its assessment areas. The bank's performance in this criterion varied among the rated areas, with the bank's good performance in the Multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA), New York State, Maryland, and Pennsylvania rated areas, which contributed the most to the overall conclusion.

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

M&T's distribution of borrowers reflected, given the product lines offered, good penetration among borrowers of different income levels and businesses of different sizes. This conclusion was based on good performance in the New York, Maryland, and Pennsylvania rated areas, and adequate performance in the Multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment area, as they contributed the most to the overall conclusion.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of its assessment areas, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices. This conclusion was based on an excellent record in the New York State and Multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) rated areas, and a good record in the Maryland and Pennsylvania rated areas, as they contributed the most to the overall conclusion.

### **Community Development Lending**

M&T was a leader in making community development loans. Examiners based this conclusion primarily on the bank's performance within the New York State, Maryland, Pennsylvania, and Multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment areas, as they received the greatest weight in the overall rating.

As shown in the following table, the bank originated 731 qualified community development loans totaling approximately \$3.9 billion, representing an overall annualized performance over 24 months of 366 loans totaling \$2.0 billion. Annualized performance increased when compared to the bank's last CRA examination's annualized performance of 227 loans totaling \$1.6 billion. The bank's current total community development activity level represented 1.5% of annualized community development loans to deposits; 11.8% of annualized community development loans to Tier 1 Capital; and 1.0% of annualized community development loans to average assets.

Included in the bank's community development lending were 404 PPP loans in amounts greater than \$1 million that also had a primary purpose of revitalization and stabilization, totaling approximately \$831.7 million.

The community development lending activity by rated area for each community development purpose is summarized in the table below.

<b>Community Development Lending by Rated Area January 1, 2020 to December 31, 2021</b>										
<b>Rated Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Connecticut	9	38,539	6	11,500	0	0	6	25,784	<b>21</b>	<b>75,823</b>
Delaware	0	0	1	10,320	0	0	2	2,195	<b>3</b>	<b>12,515</b>
Florida	5	91,655	0	0	0	0	1	3,466	<b>6</b>	<b>95,121</b>
Massachusetts	5	43,147	3	14,708	0	0	2	5,789	<b>10</b>	<b>63,644</b>
Maryland	12	136,739	11	166,534	3	23,834	47	95,845	<b>73</b>	<b>422,952</b>
New Jersey	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
New York	32	193,275	49	436,397	16	69,529	143	381,986	<b>240</b>	<b>1,081,188</b>
Pennsylvania	1	723	7	121,100	1	1,036	31	65,257	<b>40</b>	<b>188,116</b>
Virginia	4	88,839	2	43,160	0	0	5	6,814	<b>11</b>	<b>138,813</b>
Multistate MSA 10900	1	8,764	4	116,000	0	0	6	56,015	<b>11</b>	<b>180,778</b>
Multistate MSA 19060	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
Multistate MSA 35620	28	217,868	47	374,836	6	8,667	85	394,386	<b>166</b>	<b>995,757</b>
Multistate MSA 37980	4	21,324	14	149,877	5	18,372	49	121,004	<b>72</b>	<b>310,577</b>
Multistate MSA 41540	0	0	0	0	1	1,075	0	0	<b>1</b>	<b>1,075</b>
Multistate MSA 47900	20	217,946	11	87,741	0	0	46	75,353	<b>77</b>	<b>381,040</b>
<b>Total</b>	<b>121</b>	<b>1,058,819</b>	<b>155</b>	<b>1,532,173</b>	<b>32</b>	<b>122,513</b>	<b>423</b>	<b>1,233,895</b>	<b>731</b>	<b>3,947,399</b>

*Source: Bank Data from January 1, 2020 to December 31, 2021*

### **Innovative and/or Flexible Lending Practices**

M&T made extensive use of innovative and/or flexible lending practices in order to serve the assessment areas' credit needs. The bank offered lending programs available in all assessment areas and state affordable lending programs were available in New York and Connecticut. State-specific programs are discussed in the relevant state rated assessment areas. Since the bank offered the following innovative or flexible lending programs throughout all of its assessment areas, examiners discussed the bank's performance under this criterion at the institution level only.

- **Homebuyer Dream Program:** This is a federally regulated set aside program offered through the Federal Home Loan Bank of New York's Affordable Housing Program ("AHP"). This grant program provided down payment or closing cost assistance to income eligible first-time homebuyers in an amount up to \$14,500.
- **Get Started:** This program was designed for borrowers who were purchasing or refinancing in a specified LMI census tract, in M&T designated areas, or whose income was at or below 80% of the U.S. Department of Housing and Urban Development ("HUD") Median Area Income in those areas. There were no income restrictions for loans in designated LMI tracts. This program was replaced by the M&T Home Starter Mortgage – First-Time Homebuyer Program ("Home Starter") in September 2019.
- **Home Starter:** Designed for borrowers purchasing in a specified LMI census tract, in M&T designated areas, or whose income was at or below 80% of the HUD Median Area Income. There were no income restrictions for loans in designated tracts.

- Federal Housing Administration (“FHA”) Loan: A type of mortgage insured by the FHA that required lower down payments (as low as 3.5%) and had less-restrictive credit requirements than many conventional home loans. This program was designed to help LMI families attain homeownership.
- FHA 203(k) Loan: This program permitted homebuyers and homeowners to finance up to \$35,000 into their mortgage to repair, improve, or upgrade their home.
- U.S. Department of Veterans Affairs (“VA”) Loan: Allowed veterans, service members, and their surviving spouses to purchase homes with little or no down payment, no private mortgage insurance, and generally at a competitive interest rate.
- PPP Loans: Loan program provided a direct incentive for small businesses adversely affected by the COVID-19 pandemic to keep their workers on their payroll. The SBA has forgiven these loans if the business met all employee retention criteria and used the funds for eligible expenses.

## INVESTMENT TEST

M&T’s overall performance under the Investment Test is rated High Satisfactory. The bank had a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors. The bank exhibited good responsiveness to credit and community development needs. The bank made significant use of innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

M&T had a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. Examiners based this conclusion primarily on the bank’s performance within New York, Maryland, Pennsylvania, and Multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment areas, as they received the greatest weight in the overall rating.

During the evaluation period, the bank made 3,135 qualified community development investments and grants totaling approximately \$1.3 billion, which included 63 new investments totaling \$386.6 million, 877 prior period investments with a balance of \$874.8 million, and 2,195 grants totaling \$31.9 million. This activity represented an overall annualized performance over 24 months of 470 investments totaling \$630.7 million and 1,097.5 grants totaling \$15.9 million. Total qualified investments and grants represented 0.5% of annualized community development investments and grants to deposits; 3.9% of annualized community development investments and grants to Tier 1 Capital; and 0.3% of annualized community development investments and grants to average assets. Although the total annualized dollar volume performance increased from the bank’s last CRA examination annualized \$349.6 million, all of the previously noted percentages decreased. Also, in certain less weighted geographies, M&T relied largely on prior period investments for its community development investment volume.

M&T’s qualified investments and grants activity by rated area for each community development purpose is illustrated in the table below:



<b>Community Development Investments and Grants by Rated Area January 1, 2020 to December 31, 2021</b>										
<b>Rated Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Connecticut	31	12,644	16	67,434	0	0	0	0	<b>47</b>	<b>80,078</b>
Delaware	5	4,011	25	588	0	0	0	0	<b>30</b>	<b>4,599</b>
Florida	1	13,266	44	371	2	2,178	0	0	<b>47</b>	<b>15,815</b>
Massachusetts	0	0	68	10,442	0	0	0	0	<b>68</b>	<b>10,442</b>
Maryland	61	144,771	161	37,716	1	1,003	3	62,994	<b>226</b>	<b>246,484</b>
New Jersey	61	11,120	18	2,322	0	0	0	0	<b>79</b>	<b>13,442</b>
New York	95	346,799	537	47,300	2	5,147	2	2,562	<b>636</b>	<b>401,808</b>
Pennsylvania	49	77,661	513	8,939	0	0	0	0	<b>562</b>	<b>86,600</b>
Virginia	14	5,381	9	120	0	0	0	0	<b>23</b>	<b>5,501</b>
Multistate MSA 10900	10	1,388	17	55	0	0	0	0	<b>27</b>	<b>1,443</b>
Multistate MSA 19060	1	615	6	29	0	0	0	0	<b>7</b>	<b>644</b>
Multistate MSA 35620	343	128,808	329	51,394	12	6,882	6	77,852	<b>690</b>	<b>264,936</b>
Multistate MSA 37980	144	54,086	352	4,680	1	2,531	1	680	<b>498</b>	<b>61,977</b>
Multistate MSA 41540	10	6,274	47	327	1	1,663	0	0	<b>58</b>	<b>8,264</b>
Multistate MSA 47900	51	86,784	84	1,388	2	3,086	0	0	<b>137</b>	<b>91,258</b>
<b>Total</b>	<b>876</b>	<b>893,608</b>	<b>2,226</b>	<b>233,105</b>	<b>21</b>	<b>22,490</b>	<b>12</b>	<b>144,088</b>	<b>3,135</b>	<b>1,293,291</b>

### Responsiveness to Credit and Community Development Needs

M&T exhibited good responsiveness to assessment area credit and community economic development needs. The bank’s qualified investments primarily promoted affordable housing efforts, which was a community development need within all the assessment areas.

### Community Development Initiatives

The bank made significant use of innovative and/or complex investments to support community development initiatives. M&T’s new investments consisted of a mix of Low-Income Housing Tax Credits (“LIHTC”), Small Business Investment Companies (“SBIC”), Community Development Credit Unions (“CDCU”), CRA investment funds, and other tax credits. The prior period investments consisted mostly of LIHTC and mortgage-backed securities.

### SERVICE TEST

M&T’s overall performance under the Service Test is rated High Satisfactory. Delivery systems were reasonably accessible to essentially all portions of the institution’s assessment areas. The bank’s record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced certain portions of the assessment areas, particularly LMI geographies and/or LMI individuals. The bank provided a relatively high level of community development services.

## **Retail Services**

### ***Accessibility of Delivery Systems***

Delivery systems were reasonably accessible to essentially all portions of the bank's assessment areas. Examiners based this conclusion primarily on the bank's performance within New York State, Maryland, Pennsylvania, and Multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment areas, as these areas contained 76.7% of branches and 78.9% of ATMs.

In addition to the physical access to M&T's branches and ATMs, the bank offered other alternative delivery systems in all assessment areas that improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

### ***Changes in Branch Locations***

To the extent changes had been made, the bank's opening and closing of branches did not generally adversely affect its accessibility of delivery systems, particularly in LMI areas. During the evaluation period, M&T did not open any new branch offices; however, the bank closed 62 branches and relocated 4 branches. Of the closed branches, 2 were in low-income tracts, 5 were in moderate-income tracts, 32 were in middle-income tracts, and 23 were in upper-income tracts. Of the relocated branches, one was relocated from a middle-income tract to a middle-income tract, another was relocated from a low-income tract to a low-income tract, a third was relocated from an upper-income tract to an upper-income tract, and a fourth branch was relocated from a middle-income tract to an upper-income tract. Regarding the branch closures in the LMI tracts, the bank continued to operate branches in the general neighborhoods or in other nearby areas, which helped mitigate the impact of the closures on those communities.

### ***Reasonableness of Business Hours and Services***

M&T's business hours and services did not vary in a way that inconvenienced certain portions of the assessment areas, particularly LMI tracts and/or individuals. The bank's service hours and its loan and deposit products were similar throughout the assessment areas. Business hours varied based on assessment area needs. Additionally, the bank offered several low-cost accounts in each of its assessment areas, which are detailed below:

- **Retail Secured Credit Card**: Offered the ability to build or rebuild credit for consumers who did not qualify for an unsecured credit card. The credit line was offset by a redeemable security deposit held in an M&T personal savings account equal to the credit line amount (\$250-\$5,000).
- **EZ Choice Checking**: A checking account that had a \$25 minimum opening balance requirement, no monthly maintenance fee, and no minimum balance requirements.
- **My Way Banking**: A checkless checking account that had a \$25 minimum opening balance requirement, no overdraft fees, no minimum balance requirements, and a \$4.95 monthly maintenance fee that was waived with one or more transactions a month.

Lastly, in response to COVID-19, the bank implemented other practices that helped lower costs for consumers, including:

- **Forbearance:** Loan payments could be paused for an initial period of six months. This initial period of forbearance could then be extended for up to a total period of 18 months, if needed and applicable.
- **Loan Modification:** An option designed to add the past due (or paused) payments, to the unpaid mortgage balance and re-calculate the monthly payment amount over a new loan term. This option included adjusting the maturity date and/or interest rate of the mortgage.
- **Partial Claim:** This solution converted the past due amounts into a no-interest subordinate lien to HUD. A subordinate lien was added to the end of the mortgage, with no interest accruing and no payments due until the earliest of the mortgage maturity, the sale of the property, or the payoff of the mortgage.
- **Payment Deferral:** Bundles paused payments into a balloon payment, due on the mortgage maturity, the sale of the property, or the payoff of the mortgage.
- **Fee Waivers:** Waived early withdrawal fees for certificates of deposit, ATM surcharge fees, Foreign ATM fees, and late fees on loans and credit cards.

### Community Development Services

M&T provided a relatively high level of community development services in its assessment areas. Examiners based this conclusion primarily on the bank’s performance within New York State, Maryland, Pennsylvania, and Multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment areas, as they received the greatest weight in the overall rating. The bank conducted 1,585 qualified community service events, representing an overall annualized performance over 24 months of 792.5 services. This represented a significant decline when compared to the last evaluation’s annualized performance of 2,205.1 services. However, in assigning an overall rating, examiners considered the impact of the COVID-19 pandemic to the bank’s efforts in providing services. Although in several assessment areas, M&T experienced a notable decline in service-related activities, much of this reflected limitations for outreach and engagement presented by the COVID-19 pandemic. Overall, the bank’s qualified community development services consisted of a wide variety of events related to financial education, technical assistance, and first-time homebuyer seminars.

The institution’s community development services by rated area and community development purpose are summarized in the table below.

<b>Community Development Services by Rated Area January 1, 2020 to December 31, 2021</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Connecticut	1	8	0	0	<b>9</b>
Delaware	2	2	0	0	<b>4</b>
Florida	0	3	0	0	<b>3</b>
Massachusetts	0	2	0	0	<b>2</b>
Maryland	15	219	87	0	<b>321</b>
New Jersey	13	20	1	0	<b>34</b>
New York	115	385	141	1	<b>642</b>

Pennsylvania	1	88	42	1	<b>132</b>
Virginia	0	7	0	0	<b>7</b>
Multistate MSA 10900	0	2	1	0	<b>3</b>
Multistate MSA 19060	0	4	0	0	<b>4</b>
Multistate MSA 35620	58	191	3	0	<b>252</b>
Multistate MSA 37980	9	70	15	0	<b>94</b>
Multistate MSA 41540	1	12	1	0	<b>14</b>
Multistate MSA 47900	15	26	23	0	<b>64</b>
<b>Total</b>	<b>230</b>	<b>1,039</b>	<b>314</b>	<b>2</b>	<b>1,585</b>

## FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

M&T was in compliance with the substantive provisions or the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices was identified as being inconsistent with helping to meet the credit needs of the assessment areas. The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”) established the Consumer Financial Protection Bureau (“CFPB”). In general, the Dodd-Frank Act gives the CFPB, among other things, primary evaluation and enforcement authority over insured depository institutions with total assets of more than \$10 billion, when assessing compliance with the requirements of Federal consumer financial laws, including M&T. The Federal Reserve, however, retained authority to enforce compliance with CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the FRBNY did not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to M&T. In determining this institution’s overall CRA rating, the Federal Reserve has considered information that was made available on a confidential basis during its consultations. The Federal Reserve has considered this information in conjunction with the factors in 12 CFR §228.28(c)(2) and has determined that an adjustment to the CRA Performance Evaluation rating is not warranted.

## MULTISTATE METROPOLITAN AREA

### **CRA RATING FOR MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ): SATISFACTORY**

*The Lending Test is rated: Low Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: Low Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in order to serve assessment area credit needs.

#### INVESTMENT TEST

- Made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Rarely used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were accessible to limited portions of the bank's assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

## SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this multistate assessment area as detailed in Appendix A.

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 2 of its 664 branch locations and 11 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 31 institutions operated 219 offices within this assessment area. M&T ranked 23<sup>rd</sup> with approximately \$178.6 million in deposits, which represented 0.8% of the deposit market share and accounted for 0.1% of the bank’s total branch deposits. This assessment area generated approximately 0.6% by number and 0.7% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions, such as Wells Fargo and PNC Bank, as well as regional banks, such as Truist Bank and Fulton Bank.

## PERFORMANCE CONTEXT

### *Demographic Characteristics*

The MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area included Warren County, NJ; Carbon County, PA; Lehigh County, PA; and Northampton County, PA. According to the 2015 ACS, the population of this assessment area was 828,232. The assessment area consisted of 179 census tracts, of which 16 or 8.9% were low-income, 34 or 19.0% were moderate-income, 78 or 43.6% were middle-income, and 51 or 28.5% were upper-income.

### *Income Characteristics*

Based on the 2015 ACS, the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area had 214,409 families, of which 20.5% were low-income (7.9% of which were below the poverty level), 18.1% were moderate-income, 21.1% were middle-income, and 40.3% were upper-income. The FFIEC median family incomes for the counties comprising the MSA as of the 2015 ACS were as follows:

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$78,162	\$84,676	8.3%
Warren County, NJ	\$93,490	\$101,985	9.1%
Carbon County, PA	\$64,030	\$71,416	11.5%
Lehigh County, PA	\$74,956	\$79,173	5.6%
Northampton County, PA	\$80,382	\$88,307	9.9%
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	\$78,162	\$84,676	8.3%
State of New Jersey	\$96,513	\$104,804	8.6%
Commonwealth of Pennsylvania	\$74,468	\$80,996	8.8%

*Source: 2011 - 2015 U.S. Census Bureau American Community Survey.  
2016 - 2020 U.S. Census Bureau American Community Survey.  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

### ***Housing Characteristics***

Based on the 2015 ACS data, the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area had 343,976 housing units, of which 64.1% were owner-occupied, 27.3% were rental, and 8.6% were vacant. Of the total housing units, 7.3% were located in low-income census tracts, 19.4% in moderate-income census tracts, 42.5% in middle-income census tracts, and 30.8% in upper-income census tracts. In low-income census tracts, 26.9% of housing units were owner-occupied, 57.6% were rental units, and 15.5% were vacant. In moderate-income census tracts, 46.0% of housing units were owner-occupied, 41.3% were rental units, and 12.7% were vacant.

The median age of housing stock in this assessment area was 49 years old, with 32.2% 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 2015 ACS, the median housing value in this assessment area was \$199,777 with an affordability ratio of 29.3. The median gross rent in the assessment area was \$941 per month.

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) Housing Characteristics</b>			
<b>Geographic Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$199,777	29.3	\$941
Warren County, NJ	\$255,300	27.6	\$1,013
Carbon County, PA	\$144,700	34.5	\$773
Lehigh County, PA	\$191,700	29.3	\$929
Northampton County, PA	\$206,100	29.6	\$957
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	\$199,777	29.4	\$941
State of New Jersey	\$315,900	22.8	\$1,192
Commonwealth of Pennsylvania	\$166,000	32.3	\$840

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

### ***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 45.8% of all rental households had rental costs that exceeded 30% of their incomes, 76.0% of low-income rental households had rental costs that exceeded 30% of their income, and 43.4% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 22.1% of homeowners had housing costs that exceeded 30% of their incomes, 71.3% of low-income homeowners had housing costs that exceeded 30% of their income, and 39.0% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	76.0%	43.4%	45.8%	71.3%	39.0%	22.1%
Warren County, NJ	74.5%	29.6%	44.2%	76.4%	50.4%	25.8%
Carbon County, PA	67.7%	18.9%	36.1%	63.5%	24.0%	22.0%
Lehigh County, PA	78.0%	44.2%	47.9%	70.8%	37.8%	21.0%
Northampton County, PA	75.0%	51.1%	45.1%	72.9%	41.1%	22.1%
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	76.0%	43.4%	45.8%	71.3%	39.0%	22.1%
State of New Jersey	78.0%	43.2%	46.7%	81.6%	55.1%	30.0%
Commonwealth of Pennsylvania	72.3%	31.7%	42.0%	61.5%	28.9%	19.6%

*\*Cost Burden is housing cost that equals 30% or more of household income.  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.*

***Labor, Employment and Economic Characteristics***

According to D&B data, there were 37,918 businesses operating in this assessment area in 2019, of which 5.7% were located in low-income census tracts and 15.7% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.2% were small businesses with a GAR of \$1 million or less, of which 5.6% were located in low-income census tracts and 15.5% were located in moderate-income census tracts.

According to D&B data, there were 35,839 businesses operating in this assessment area in 2020, of which 5.6% were located in low-income census tracts and 15.7% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.2% were small businesses with a GAR of \$1 million or less, of which 5.5% were located in low-income census tracts and 15.5% were located in moderate-income census tracts.

According to D&B data, there were 35,032 businesses operating in this assessment area in 2021, of which 5.7% were located in low-income census tracts and 15.7% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.1% were small businesses with a GAR of \$1 million or less, of which 5.7% were located in low-income census tracts and 15.5% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.5% in 2019, increased to 9.2% in 2020, and decreased to 6.3% in 2021. The Commonwealth of Pennsylvania had an unemployment rate of 4.5% in 2019, increased to 9.1% in 2020, and decreased to 6.3% in 2021.

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.5%	9.2%	6.3%
Warren County, NJ	3.2%	8.2%	5.5%



Carbon County, PA	5.5%	9.8%	6.7%
Lehigh County, PA	4.6%	9.6%	6.8%
Northampton County, PA	4.6%	8.9%	5.9%
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	4.5%	9.2%	6.3%
State of New Jersey	3.4%	9.5%	6.3%
Commonwealth of Pennsylvania	4.5%	9.1%	6.3%

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

Additional performance context data for this assessment area is provided in the following MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) Assessment Area Demographics Table:

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) Assessment Area Demographics</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	8.9	13,315	6.2	4,633	34.8	44,006	20.5
Moderate-income	34	19.0	36,343	17.0	5,648	15.5	38,780	18.1
Middle-income	78	43.6	89,783	41.9	4,747	5.3	45,189	21.1
Upper-income	51	28.5	74,968	35.0	1,890	2.5	86,434	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>179</b>	<b>100.0</b>	<b>214,409</b>	<b>100.0</b>	<b>16,918</b>	<b>7.9</b>	<b>214,409</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	25,037	6,742	3.1	26.9	14,409	57.6	3,886	15.5
Moderate-income	66,903	30,801	14.0	46.0	27,624	41.3	8,478	12.7
Middle-income	146,249	97,346	44.1	66.6	36,765	25.1	12,138	8.3
Upper-income	105,787	85,632	38.8	80.9	14,986	14.2	5,169	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>343,976</b>	<b>220,521</b>	<b>100.0</b>	<b>64.1</b>	<b>93,784</b>	<b>27.3</b>	<b>29,671</b>	<b>8.6</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	2,011	5.7	1,807	5.7	183	6.8	21	4.8
Moderate-income	5,485	15.7	4,931	15.5	488	18.1	66	15.0
Middle-income	14,178	40.5	12,958	40.6	1,014	37.7	206	46.9
Upper-income	13,358	38.1	12,208	38.3	1,004	37.3	146	33.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>35,032</b>	<b>100.0</b>	<b>31,904</b>	<b>100.0</b>	<b>2,689</b>	<b>100.0</b>	<b>439</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.1</b>		<b>7.7</b>		<b>1.3</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					

	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.3	2	0.4	0	0.0	0	0.0
Moderate-income	31	5.3	28	5.0	3	20.0	0	0.0
Middle-income	262	45.1	257	45.5	5	33.3	0	0.0
Upper-income	286	49.2	278	49.2	7	46.7	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>581</b>	<b>100.0</b>	<b>565</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.2</b>		<b>2.6</b>		<b>.2</b>
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.</i>								

## Community Contact

Examiners conducted community contact interviews with two community organizations that served this assessment area. The first community contact interview was held with an organization that provided affordable housing in Lehigh County, PA. The second community contact interview was with an organization that provided housing, community loan funding, food distributions, and home weatherization in this assessment area.

Both contacts noted significant increases in living costs, notably with rent, oil, and general prices. Food banks and food pantries have seen a significant increase in demand. The contacts also mentioned that the poor quality of housing stock was a challenge to residents of Lehigh County. Additionally, evictions and homelessness had spiked, especially among LMI individuals. Both organizations mentioned that financial institutions have an opportunity to help improve access to affordable housing and food pantry projects by providing additional funding. The organizations also believe that renters would benefit from financial literacy training.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 10900 (ALLENTOWN-BETHLEHEM-EASTON, PA-NJ)

### LENDING TEST

M&T's performance is rated Low Satisfactory in the lending test for this assessment area. The bank's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes. The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of this assessment area, to low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the credit needs of this assessment area.

### Lending Activity

M&T's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. This assessment area had competitors including large financial institutions and regional banks. The bank's market share of deposits slightly decreased during the evaluation period, while the bank's lending market share in this assessment area was generally stable.

In 2021, the bank ranked 23<sup>rd</sup> out of 31 institutions with a deposit market share of 0.8%. In total HMDA lending, the bank ranked 60<sup>th</sup> out of 626 reporters with a market share of 0.3%, including market shares of 0.3% in home purchase lending, 0.3% in refinance, 1.3% in home improvement, and 0.4% in multifamily loans. M&T ranked 23<sup>rd</sup> out of 159 reporters with a market share of 0.8% in small business lending.

In 2020, the bank ranked 19<sup>th</sup> out of 32 institutions with a deposit market share of 1.2%. In total HMDA lending, the bank ranked 60<sup>th</sup> out of 576 reporters with a market share of 0.3%, including market shares of 0.4% in home purchase lending, 0.2% in refinance, and 1.4% in home improvement loans. M&T ranked 21<sup>st</sup> out of 163 reporters with a market share of 1.3% in small business lending.

In 2019, the bank ranked 18<sup>th</sup> out of 32 institutions with a deposit market share of 1.4%. In total HMDA lending, the bank ranked 51<sup>st</sup> out of 526 reporters with a market share of 0.4%, including market shares of 0.2% in home purchase lending, 0.5% in refinance, 1.6% in home improvement, and 0.7% in multifamily loans. M&T ranked 27<sup>th</sup> out of 124 reporters with a market share of 0.4% in small business lending.

M&T's lending in this assessment area is summarized in the table below.

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	62	12.0	4,833	3.2
Home Purchase	135	26.1	31,733	21.1
Loan Purpose Not Applicable	142	27.4	22,119	14.7
Multi-Family	7	1.4	64,046	42.5
Refinancing	172	33.2	27,798	18.5
<b>Total HMDA</b>	<b>518</b>	<b>50.8</b>	<b>150,529</b>	<b>69.4</b>
<b>Total Small Business</b>	<b>500</b>	<b>49.1</b>	<b>65,917</b>	<b>30.4</b>
<b>Total Small Farm</b>	<b>1</b>	<b>0.1</b>	<b>350</b>	<b>0.2</b>
<b>TOTAL LOAN</b>	<b>1,019</b>	<b>100.0</b>	<b>216,796</b>	<b>100.0</b>

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout this assessment area. Lending penetration in LMI tracts was good for home purchase, excellent for refinance, adequate for home improvement, adequate for multifamily, and good for small business.

### **Gap Analysis**

M&T demonstrated a good level of dispersion in LMI census tracts in this assessment area. In 2019, the bank's performance was at 25.0% and 61.8%, in LMI census tracts, respectively, and showed an increase in 2020, with a decline in low-income tracts in 2021. Overall, performance in this assessment area showed improvement when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	16	12	25.0%
Moderate	34	13	61.8%
Middle	78	36	53.8%
Upper	51	14	72.5%
Income Unknown	0	0	
<b>2020</b>			
Low	16	5	68.8%
Moderate	34	7	79.4%
Middle	78	12	84.6%
Upper	51	6	88.2%
Income Unknown	0	0	
<b>2021</b>			
Low	16	10	37.5%
Moderate	34	7	79.4%
Middle	78	16	79.5%
Upper	51	6	88.2%
Income Unknown	0	0	

### ***Home Purchase Loans***

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area.

In 2021, the bank made 7.0% by number and 2.1% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 3.1% of owner-occupied housing units located in low-income census tracts and above the aggregate by number, which made 4.8% by number and 2.8% by dollar in low-income census tracts. In 2021, the bank made 16.3% of home purchase loans by number and 10.2% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly above the 14.0% of owner-occupied housing units located in moderate-income census tracts and was slightly below the aggregate, which made 19.7% by number and 14.0% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 5.4% by number and 3.3% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 3.1% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 4.6% by number and 2.7% by dollar in low-income census tracts. In 2020, the bank made 10.7% of home purchase loans by number and 8.6% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly below the 14.0% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 17.9% by number and 12.3% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 2.8% by number and 1.3% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was similar to the 3.1% of owner-

occupied housing units located in low-income census tracts and below the aggregate, which made 4.6% by number and 2.5% by dollar in low-income census tracts. In 2019, the bank made 25.0% of home purchase loans by number and 16.1% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 14.0% of owner-occupied housing units located in moderate-income census tracts and was above the aggregate, which made 17.8% by number and 12.1% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 3.8% by number and 2.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was above the 3.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.7% by number and 1.0% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 23.1% by number and 14.7% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly above the 14.0% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 11.0% by number and 7.4% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 2.1% by number and 0.3% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 3.1% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 1.5% by number and 0.8% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 19.1% by number and 10.7% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was above the 14.0% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 8.3% by number and 5.3% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 6.4% by number and 2.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly above the 3.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.0% by number and 1.1% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 19.1% by number and 13.3% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was above the 14.0% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 10.6% by number and 6.7% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 5.3% by number and 2.6% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was above the 3.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.1% by number and 1.9% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 5.3% by number and 3.1% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income

census tracts was significantly below the 14.0% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 10.9% by number and 8.5% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank did not make any home improvement loans in low-income census tracts. The bank made 22.2% by number and 12.5% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly above the 14.0% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 10.2% by number and 8.0% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank did not make any home improvement loans in low-income census tracts. The bank made 8.0% by number and 2.6% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 14.0% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 10.1% by number and 8.9% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected adequate penetration throughout the assessment area.

In 2021, the bank did not make any multifamily loans in low-income census tracts. The bank made 100.0% by number and 100.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 27.4% of multifamily housing units located in moderate-income census tracts and significantly above the aggregate, which made 33.9% by number and 24.1% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 80.0% by number and 96.1% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 11.1% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 27.1% by number and 19.8% by dollar of multifamily loans in low-income census tracts. The bank did not make any multifamily loans in moderate-income census tracts.

In 2019, the bank made 100.0% by number and 100.0% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 11.1% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 23.0% by number and 9.2% by dollar of multifamily loans in low-income census tracts. The bank did not make any multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 4.0% by number and 1.6% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was below the 5.7% of businesses located in low-income census tracts and slightly below the aggregate, which made 5.0% by number and 4.2% by dollar of small business loans in low-income census tracts. In 2021, the bank made 16.1% by number and 24.2% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 15.7% of

businesses located in moderate-income census tracts and similar to the aggregate, which made 15.9% by number and 17.4% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 4.7% by number and 3.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 5.7% of businesses located in low-income census tracts and similar to the aggregate, which made 4.9% by number and 5.1% by dollar of small business loans in low-income census tracts. In 2020, the bank made 14.2% by number and 12.4% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 15.7% of businesses located in moderate-income census tracts and similar to the aggregate, which made 15.2% by number and 15.7% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 5.5% by number and 7.3% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 5.7% of businesses located in low-income census tracts and slightly above the aggregate, which made 5.0% by number and 5.4% by dollar of small business loans in low-income census tracts. In 2019, the bank made 15.1% by number and 1.8% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 15.7% of businesses located in moderate-income census tracts and similar to the aggregate, which made 15.1% by number and 14.8% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was adequate.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among low- and moderate-income borrowers for home purchase lending.

In 2021, the bank made 18.6% by number and 9.3% by dollar to low-income borrowers and was similar to the 20.5% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 9.5% by number and 5.7% by dollar to low-income families. The bank's lending to moderate-income borrowers was 18.6% by number and 17.3% by dollar, which was slightly below the aggregate performance of 21.8% by number, similar to 17.4% by dollar, and similar to the 18.1% moderate-income families in the assessment area.

In 2020, the bank made 5.4% by number and 2.8% by dollar to low-income borrowers and was significantly below the 20.5% of low-income families in the assessment area. Performance was below aggregate lending, which made 9.3% by number and 5.4% by dollar to low-income families. The bank's lending to moderate-income borrowers was 26.8% by number and 21.9% by dollar, which was slightly above the aggregate performance of 23.1% by number, slightly above 18.3% by dollar, and above the 18.1% moderate-income families in the assessment area.

In 2019, the bank made 2.8% by number and 1.6% by dollar to low-income borrowers and was significantly below the 20.5% of low-income families in the assessment area. Performance was significantly below aggregate lending, which made 9.8% by number and 5.6% by dollar to low-income families. The bank's lending to moderate-income borrowers was 30.6% by number and 23.0% by dollar, which was above the

aggregate performance of 23.8% by number, slightly above 18.6% by dollar, and significantly above the 18.1% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low- and moderate-income borrowers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 16.7% by number and 9.3% by dollar and was significantly above the aggregate lending data at 5.7% by number and 3.2% by dollar. The bank's performance was slightly below the 20.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 21.8% by number and 15.5% by dollar, was above the aggregate lending data at 16.3% by number, above 12.0% by dollar, and slightly above the 18.1% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 6.4% by number and 1.4% by dollar and was significantly above the aggregate lending data, at 3.5% by number and 1.7% by dollar. The bank's performance was significantly below the 20.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 25.5% by number and 15.2% by dollar, was significantly above the aggregate lending data at 12.2% by number, significantly above 8.3% by dollar, and above the 18.1% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 17.0% by number and 8.6% by dollar and was significantly above the aggregate lending data, at 6.6% by number and 3.5% by dollar. The bank's performance was slightly below the 20.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 21.3% by number and 18.9% by dollar, was above the aggregate lending data at 15.5% by number, significantly above 10.6% by dollar, and slightly above the 18.1% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low- and moderate-income borrowers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 26.3% by number and 16.3% by dollar and was significantly above the aggregate lending data, at 7.5% by number and 5.4% by dollar. The bank's performance was above the 20.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 5.3% by number and 1.8% by dollar, was significantly below the aggregate lending data at 14.1% by number, significantly below 11.3% by dollar, and significantly below the moderate-income families in the assessment area at 18.1%.

In 2020, the bank made no loans to low-income borrowers. This was significantly below the aggregate lending data, at 5.3% by number and 3.1% by dollar. The bank's performance was significantly below the 20.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 38.9% by number and 33.4% by dollar, was significantly above the aggregate lending data at 15.8% by number, significantly above 12.2% by dollar, and significantly above the moderate-income families in the assessment area at 18.1%.

In 2019, the bank's lending to low-income borrowers was 12.0% by number and 2.5% by dollar and was significantly above the aggregate lending data, at 7.5% by number and 5.3% by dollar. The bank's performance was below the 20.5% of low-income families in the assessment area. The bank's lending to



moderate-income borrowers, at 16.0% by number and 4.1% by dollar, was similar to the aggregate lending data at 16.2% by number, significantly below 13.7% by dollar, and slightly below the moderate-income families in the assessment area at 18.1%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low- and moderate-income borrowers for small business lending.

In 2021, the bank originated 29.9% of loans by number and 24.3% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 49.7% by number and 29.5% by dollar, in addition to being significantly below the 91.1% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 71.3% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 40.3% of loans by number and 24.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 42.2% by number and 29.2% by dollar, in addition to being significantly below the 91.1% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 67.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 61.6% of loans by number and 28.0% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 47.6% by number and 35.1% by dollar, in addition to being below the 91.2% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 71.2% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment area, to low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 11 loans for approximately \$180.8 million. The community development lending in this assessment area represented 4.6% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$90.4 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$63.2 million, this represented an increase in performance. Additionally, based on annualized community development loans to deposits, the bank ranked first 1<sup>st</sup> out of five compared to similarly situated banks that primarily served this multistate assessment area.

The institution's community development loans by year and purpose are summarized in the table below.

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)</b>										
<b>Community Development Lending</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	1	8,764	2	88,000	0	0	5	54,931	8	151,695
2021	0	0	2	28,000	0	0	1	1,083	3	29,083
<b>Total</b>	<b>1</b>	<b>8,764</b>	<b>4</b>	<b>116,000</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>56,014</b>	<b>11</b>	<b>180,778</b>

Examples of community development lending which benefited this assessment area included the following:

- In 2020, the bank made a \$8.8 million loan to fund construction of a 59-unit multi-family affordable housing project being constructed in a low-income census tract designated as a Neighborhood Improvement Zone.

In 2020 and 2021, the bank originated three PPP loans in amounts greater than \$1 million, totaling approximately \$3.6 million, businesses in LMI census tracts, which helped to revitalize and stabilize these communities.

### **Innovative and/or Flexible Lending Practices**

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### **INVESTMENT TEST**

M&T’s performance is rated Low Satisfactory in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank rarely used innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank made an adequate level of qualified community development investments and grants although rarely in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 27 qualified investments and grants totaling \$1.4 million in this assessment area, which included 10 prior period investments with a current balance of \$1.4 million and 17 grants totaling \$55,000. The community development activity in this assessment area represented 0.1% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments increased since the prior evaluation, with \$722,000 in annualized qualified investments over 24 months at this evaluation, compared to \$349,000 in annualized qualified investments at the previous evaluation. Although based on annualized investments and grants to deposits, the bank ranked 2<sup>nd</sup> out of five compared to similarly situated banks that primarily served this multistate assessment area, the performance was primarily driven by prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	10	1,388	0	0	0	0	0	0	10	1,388
<b>Total Investments</b>	<b>10</b>	<b>1,388</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>1,388</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>17</b>	<b>55</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>17</b>	<b>55</b>
<b>Grand Total</b>	<b>10</b>	<b>1,388</b>	<b>17</b>	<b>55</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>27</b>	<b>1,443</b>

The following is an example of a community development investment that benefited this assessment area:

- The bank’s prior period investments totaling \$1.4 million consisted of mortgage-backed securities that were used to build properties that qualified for LIHTC. LIHTC are a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments, the bank supported affordable housing for LMI individuals.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited adequate responsiveness to assessment area credit and community development needs. All of the bank’s qualified investments primarily promoted affordable housing efforts, which is a community development need within this assessment area. Qualified grants primarily promoted community services towards LMI individuals, which was also identified as a community development need within this assessment area.

### **Community Development Initiatives**

The bank rarely used innovative and/or complex investments to support community development initiatives. All of the bank’s investments, including those purchased in a prior period, consisted of mortgage-backed securities which are not considered particularly innovative and/or complex.

### **SERVICE TEST**

M&T’s performance is rated Low Satisfactory in the service test for this assessment area. Delivery systems were accessible to limited portions of the bank’s assessment area. To the extent changes were made, the bank’s opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI areas. Services did not vary in a way that inconvenienced portions of the assessment area, particularly to LMI census tracts and/or LMI individuals. The bank provided an adequate level of community development services in this assessment area.

### **Retail Services**

#### *Accessibility of Delivery Systems*

Delivery systems were accessible to limited portions of the bank’s assessment area. M&T operated two full-service branches in this assessment area, both of which were located in middle-income census tracts.

Additionally, the bank maintained a total of 11 ATMs, one full-service ATM at each branch location, and nine off-site cash-only ATMs, of which two (18.2%) were in LMI census tracts. However, the percentage of ATMs was less than the percentage of LMI census tracts in this MSA (27.9%) and the percentage of the population residing in LMI census tracts (26.7%).

***Changes in Branch Locations***

To the extent changes were made, the bank’s opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI areas. Although the bank closed three branches during the evaluation period, two of the closed branches were in middle-income tracts and one was in an upper-income tract. Additionally, the remaining branches were adjacent to LMI census tracts.

***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced portions of the assessment area, particularly to LMI census tracts and/or individuals. Both branches, which were adjacent to LMI census tracts, offered extended hours, weekend hours, and drive-thru hours.

The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

**Community Development Services**

M&T provided an adequate level of community development services in this assessment area. The bank provided three services during the evaluation period. This activity accounted for 0.2% of the bank’s total number of community development services activity. On an annualized basis over 24 months, this represented a decrease, as the bank conducted 1.5 community development services, compared to the previous evaluation’s annualized performance of 6.3 community development services. However, this decrease can be attributed to the restrictions imposed due to COVID-19. Additionally, the bank had 36 community development service hours during the evaluation period, which on an annualized basis was 18 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)</b>					
<b>Community Development Services</b>					
<b>January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	0	2	1	0	<b>3</b>
2021	0	0	0	0	<b>0</b>
<b>Total</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>3</b>

The following is an example of community development services that benefited this assessment area:

- In 2022, two bank employees served on the board of directors for organizations dedicated to providing various services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and emergency services to LMI populations within this assessment area.

## MULTISTATE METROPOLITAN AREA

### CRA RATING FOR MSA 19060 (Cumberland, MD-WV): SATISFACTORY

*The Lending Test is rated: Low Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: Low Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses.
- Made a low level of community development loans.
- Made use of and/or flexible lending practices in order to serve assessment area credit needs.

#### INVESTMENT TEST

- Made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Rarely used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were reasonably accessible to essentially all portions of the bank's assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

## SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this multistate assessment area as detailed in Appendix A.

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 7 of its 664 locations and 8 of its 1,882 ATMs in this assessment area during this evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 7 institutions operated 25 offices within this assessment area. M&T ranked 2<sup>nd</sup> with approximately \$320.5 million in deposits, which represented 29.5% of the deposit market share and accounted for 0.2% of the bank’s total branch deposits. This assessment area generated approximately 0.5% by number and 0.2% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included regional banks such as First United Bank and Trust, Truist Bank, and Standard Bank.

## PERFORMANCE CONTEXT

### *Demographic Characteristics*

The MSA 19060 (Cumberland, MD-WV) assessment area included Allegany County and Mineral County. According to the 2015 ACS, the population of this assessment area was 101,304. The assessment area consisted of 30 census tracts, of which none were low-income, five or 16.7% were moderate-income, 20 or 66.7% were middle-income, and five or 16.7% were upper-income.

### *Income Characteristics*

Based on the 2015 ACS, the MSA 19060 (Cumberland, MD-WV) assessment area had 23,667 families, of which 21.3% were low-income (11.8% of which were below the poverty level), 18.2% were moderate-income, 20.1% were middle-income, and 40.4% were upper-income.

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

<b>MSA 19060 (Cumberland, MD-WV) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$58,525	\$63,095	7.8%
Allegany County, MD	\$60,534	\$62,954	4.0%
Mineral County, WV	\$54,714	\$63,462	16.0%
MSA 19060 (Cumberland, MD-WV)	\$58,525	\$63,095	7.8%
State of Maryland	\$98,429	\$105,790	7.5%
State of West Virginia	\$57,760	\$61,707	6.8%

*Source: 2011 – 2015 ACS  
2016 - 2020 U.S. Census Bureau American Community Survey.  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

**Housing Characteristics**

Based on the 2015 ACS data, the MSA 19060 (Cumberland, MD-WV) assessment area had 46,338 housing units, of which 56.0% were owner-occupied, 29.5% were rental, and 14.6% were vacant. Of the total housing units disbursed in existing tract designations, 16.5% in moderate-income census tracts, 65.3% in middle-income census tracts, and 18.1% in upper-income census tracts. In low-income census tracts, 0.0% of housing units were owner-occupied, 0.0% were rental units, and 0.0% were vacant. In moderate-income census tracts, 43.3% of housing units were owner-occupied, 41.6% were rental units, and 15.1% were vacant.

The median age of housing stock in this assessment area was 54 years old, with 36.4% of the stock built before 1950. The median age of housing stock was 61 years in moderate-income tracts. According to the 2015 ACS, the median housing value in this assessment area was \$120,244 with an affordability ratio of 31.7. The median gross rent in the assessment area was \$582 per month.

<b>MSA 19060 (Cumberland, MD-WV) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$120,244	31.7	\$582
Allegany County, MD	\$120,800	33.6	\$624
Mineral County, WV	\$118,800	26.8	\$531
MSA 19060 Cumberland, MD-WV)	\$120,244	31.7	\$582
State of Maryland	\$286,900	26.0	\$1,230
State of West Virginia	\$103,800	40.2	\$643

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

**Housing Cost Burden**

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 40.5% of all rental households had rental costs that exceeded 30% of their incomes, 63.5% of low-income rental households had rental costs that exceeded 30% of their income, and 16.5% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 15.9% of homeowners had housing costs that exceeded 30% of their incomes, 48.7% of low-income homeowners had housing costs that exceeded 30% of their income, and 16.0% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 19060 (Cumberland, MD-WV) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	63.5%	16.5%	40.5%	48.7%	16.0%	15.9%
Allegany County, MD	66.9%	20.6%	44.3%	52.3%	17.0%	17.0%

Mineral County, WV	50.7%	7.5%	28.0%	41.2%	13.6%	13.2%
MSA 19060 (Cumberland, MD-WV)	63.5%	16.5%	40.5%	48.7%	16.0%	15.9%
State of Maryland	77.2%	44.4%	45.2%	66.6%	39.4%	22.1%
State of West Virginia	62.4%	30.3%	36.9%	45.1%	17.8%	13.8%

\*Cost Burden is housing cost that equals 30% or more of household income.

Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.

### Labor, Employment and Economic Characteristics

According to D&B data, there were 2,753 businesses operating in this assessment area in 2021, of which 14.9% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 90.0% were small businesses with a GAR of \$1 million or less, of which 0.0% were located in low-income census tracts and 14.5% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 5.2% in 2019, increased to 7.7% in 2020, and decreased to 5.9% in 2021. The state of West Virginia had an unemployment rate of 4.9% in 2019, increased to 8.2% in 2020, and decreased to 5.0% in 2021.

MSA 19060 (Cumberland, MD-WV) Unemployment Rates			
Area	2019	2020	2021
Assessment Area	5.2%	7.7%	5.9%
Allegany County, MD	5.0%	7.8%	6.5%
Mineral County, WV	5.7%	7.4%	4.7%
MSA 19060 (Cumberland, MD-WV)	5.2%	7.7%	5.9%
State of Maryland	3.4%	6.7%	5.8%
State of West Virginia	4.9%	8.2%	5.0%

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

Additional performance context data for this assessment area is provided in the following MSA 19060 (Cumberland, MD-WV) Assessment Area Demographics Table:

MSA 19060 (Cumberland, MD-WV) Assessment Area Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,038	21.3
Moderate-income	5	16.7	3,462	14.6	887	25.6	4,315	18.2
Middle-income	20	66.7	15,926	67.3	1,563	9.8	4,761	20.1
Upper-income	5	16.7	4,279	18.1	334	7.8	9,553	40.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>30</b>	<b>100.0</b>	<b>23,667</b>	<b>100.0</b>	<b>2,784</b>	<b>11.8</b>	<b>23,667</b>	<b>100.0</b>
Housing Units by Tract	<b>Housing Types by Tract</b>							
	<b>Owner-Occupied</b>				<b>Rental</b>		<b>Vacant</b>	
	#	%	%	#	%	#	%	



Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	7,657	3,312	12.8	43.3	3,187	41.6	1,158	15.1
Middle-income	30,274	17,907	69.0	59.1	7,992	26.4	4,375	14.5
Upper-income	8,407	4,718	18.2	56.1	2,473	29.4	1,216	14.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>46,338</b>	<b>25,937</b>	<b>100.0</b>	<b>56.0</b>	<b>13,652</b>	<b>29.5</b>	<b>6,749</b>	<b>14.6</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	410	14.9	360	14.5	43	19.4	7	13.5
Middle-income	1,722	62.5	1,545	62.3	137	61.7	40	76.9
Upper-income	621	22.6	574	23.2	42	18.9	5	9.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>2,753</b>	<b>100.0</b>	<b>2,479</b>	<b>100.0</b>	<b>222</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>		<b>90.0</b>		<b>8.1</b>		<b>1.9</b>	
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	4.8	3	4.8	0	0.0	0	0.0
Middle-income	57	90.5	57	90.5	0	0.0	0	0.0
Upper-income	3	4.8	3	4.8	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>63</b>	<b>100.0</b>	<b>63</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>		<b>100.0</b>		<b>.0</b>		<b>.0</b>	
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.</i>								

## Community Contact

Examiners conducted a community contact interview with a community organization that served this assessment area. The community contact interview was held with a nonprofit organization created to promote the economic development of the Cumberland area, Maryland's second largest city. According to the organization, this area is in an affordable housing crisis, having either historic homes or blighted properties, each of which need renovations. The contact stated that although the area has benefited from the growth in the number of warehouses and logistics companies, the lack of housing options for the workforce makes it difficult for local employers to recruit workers to the area.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 19060 (CUMBERLAND, MD-WV)

## LENDING TEST

M&T's performance is rated Low Satisfactory in the lending test for this assessment area. The bank's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected adequate penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of this assessment area, to low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank made a low level of community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### Lending Activity

M&T's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. This assessment area had competitors that included regional banks. Despite this, the bank ranked top three in deposit market share, which increased over time. The bank's HMDA lending remained consistent, and the bank was a top three small business lender throughout the evaluation period.

In 2021, the bank ranked 2<sup>nd</sup> out of seven institutions with a deposit market share of 29.5%. In total HMDA lending, the bank ranked 8<sup>th</sup> out of 173 reporters with a market share of 3.1%, including market shares of 1.7% in home purchase lending, 2.9% in refinance, 25.0% in home improvement, and 19.0% in multifamily loans. M&T ranked 3<sup>rd</sup> out of 64 reporters with a market share of 13.4% in small business lending.

In 2020, the bank ranked 3<sup>rd</sup> out of six institutions with a deposit market share of 25.4%. In total HMDA lending, the bank ranked 11<sup>th</sup> out of 152 reporters with a market share of 2.5%, including market shares of 1.0% in home purchase lending, 3.2% in refinance, 24.6% in home improvement, and 0.0% in multifamily loans. M&T ranked 2<sup>nd</sup> out of 68 reporters with a market share of 17.5% in small business lending.

In 2019, the bank ranked 3<sup>rd</sup> out of six institutions with a deposit market share of 24.6%. In total HMDA lending, the bank ranked 7<sup>th</sup> out of 144 reporters with a market share of 3.6%, including market shares of 1.4% in home purchase lending, 4.5% in refinance, 27.9% in home improvement, and 0.0% in multifamily loans. M&T ranked 3<sup>rd</sup> out of 57 reporters with a market share of 10.9% in small business lending.

M&T's lending in this assessment area is summarized in the table below.

<b>MSA 19060 (Cumberland, MD-WV)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	64	25.9	3,398	14.5
Home Purchase	58	23.5	7,174	30.6
Loan Purpose Not Applicable	10	4.0	842	3.6
Multi-Family	4	1.6	1,868	8.0
Refinancing	111	44.9	10,143	43.3
<b>Total HMDA</b>	<b>247</b>	<b>31.1</b>	<b>23,425</b>	<b>40.0</b>
<b>Total Small Business</b>	<b>547</b>	<b>68.9</b>	<b>35,192</b>	<b>60.0</b>
<b>TOTAL LOAN</b>	<b>794</b>	<b>100.0</b>	<b>58,617</b>	<b>100.0</b>

### Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout this assessment area. Since there were no low-income census tracts in this assessment area, the rating was based entirely on moderate-income tract performance. Lending penetration in moderate-income tracts was poor for home purchase, good for refinance, adequate for home improvement, very poor for multifamily, and adequate for small business.

### Gap Analysis

M&T demonstrated an excellent level of dispersion in moderate-income census tracts in this assessment area. The bank's performance was at 100.0% for all years. Overall, performance in this assessment area showed improvement when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 19060 (Cumberland, MD-WV)</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Lending Gap Analysis</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	0	0	
Moderate	5	0	100.0%
Middle	20	0	100.0%
Upper	5	0	100.0%
Income Unknown	0	0	
<b>2020</b>			
Low	0	0	
Moderate	5	0	100.0%
Middle	20	1	95.0%
Upper	5	0	100.0%
Income Unknown	0	0	
<b>2021</b>			
Low	0	0	
Moderate	5	0	100.0%
Middle	20	0	100.0%
Upper	5	0	100.0%
Income Unknown	0	0	

### Home Purchase Loans

The geographic distribution of home purchase loans reflected poor penetration throughout the assessment area.

In 2021, the bank made 3.7% by number and 3.0% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending performance was significantly below the 12.8% of owner-occupied housing units located in moderate-income census tracts and was significantly below the aggregate, which made 12.5% by number and 9.3% by dollar of home purchase loans in moderate-income census tracts.

In 2020 and in 2019, the bank did not make any home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 12.2% by number and 10.6% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 12.8% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 8.6% by number and 6.9% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 15.8% by number and 18.3% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly above the 12.8% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 9.7% by number and 7.5% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 9.4% by number and 5.8% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 12.8% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 8.6% by number and 7.0% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 8.0% by number and 2.5% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 12.8% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 10.0% by number and 6.6% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank did not make any home improvement loans in moderate-income census tracts.

In 2019, the bank made 8.3% by number and 6.0% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 12.8% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 9.3% by number and 8.8% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected very poor penetration throughout the assessment area. The bank did not make any multifamily loans in moderate-income census tracts in 2021, 2020 or in 2019.

### ***Small Business Loans***

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

In 2021, the bank made 16.5% by number and 15.0% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly above the 14.9% of businesses located in moderate-income census tracts and above the aggregate, which made 11.2% by number and 9.9% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 12.9% by number and 11.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 14.9% of businesses located in moderate-income census tracts and similar to the aggregate, which made 13.0% by number and 11.3% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 7.3% by number and 5.7% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly below the 14.5% of businesses located in moderate-income census tracts and below the aggregate, which made 11.5% by number and 15.8% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 11.1% by number and 7.0% by dollar to low-income borrowers and was below the 21.3% of low-income families in the assessment area. Performance was above aggregate lending, which made 7.8% by number and 4.6% by dollar to low-income families. The bank's lending to moderate-income borrowers was 25.9% by number and 29.8% by dollar, which was above the aggregate performance of 20.4% by number, significantly above 15.9% by dollar, and above the 18.2% moderate-income families in the assessment area.

In 2020, the bank made 15.4% by number and 15.5% by dollar to low-income borrowers and was below the 21.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 8.8% by number and 4.9% by dollar to low-income families. The bank's lending to moderate-income borrowers was 46.2% by number and 44.1% by dollar, which was significantly above the aggregate performance of 21.6% by number, significantly above 17.6% by dollar, and significantly above the 18.2% moderate-income families in the assessment area.

In 2019, the bank made 16.7% by number and 6.5% by dollar to low-income borrowers and was slightly below the 21.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 9.7% by number and 5.7% by dollar to low-income families. The bank did not make any loans to moderate-income borrowers.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 7.3% by number and 4.5% by dollar and was above the aggregate lending data, at 5.4% by number and 2.9% by dollar. The bank's performance was significantly below the 21.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 12.2% by number and 11.1% by dollar, was similar to the aggregate lending data at 13.2% by number, slightly above 9.7% by dollar, and below the 18.2% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 7.9% by number and 4.8% by dollar and was significantly above the aggregate lending data, at 4.1% by number and 1.9% by dollar. The bank's performance was significantly below the 21.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 23.7% by number and 13.3% by dollar, was significantly above the aggregate lending data at 13.2% by number, significantly above 8.7% by dollar, and above the 18.2% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 12.5% by number and 6.6% by dollar and was above the aggregate lending data, at 9.3% by number and 5.6% by dollar. The bank's performance was below the 21.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 15.6% by number and 14.0% by dollar, was slightly above the aggregate lending data at 13.1% by number, significantly above 9.1% by dollar, and slightly below the 18.2% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among low-income customers and good penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 8.0% by number and 5.2% by dollar and was similar to the aggregate lending data, at 8.0% by number and 6.7% by dollar. The bank's performance was significantly below the 21.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 24.0% by number and 19.7% by dollar, was above the aggregate lending data at 19.0% by number, above 15.7% by dollar, and above the moderate-income families in the assessment area at 18.2%.

In 2020, the bank made no loans to low-income borrowers. This was significantly below the aggregate lending data, at 8.2% by number and 6.0% by dollar. The bank's performance was significantly below the 21.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 26.7% by number and 16.5% by dollar, was significantly above the aggregate lending data at 16.4% by number, slightly above 13.5% by dollar, and above the moderate-income families in the assessment area at 18.2%.

In 2019, the bank's lending to low-income borrowers was 29.2% by number and 17.3% by dollar and was significantly above the aggregate lending data, at 15.1% by number and 10.2% by dollar. The bank's performance was above the 21.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 8.3% by number and 6.9% by dollar, was below the aggregate lending data

at 11.6% by number, below 11.4% by dollar, and significantly below the moderate-income families in the assessment area at 18.2%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 40.3% of loans by number and 27.2% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly below the aggregate lending data, at 45.0% by number and 27.6% by dollar, in addition to being significantly below the 90.0% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 85.4% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 47.0% of loans by number and 25.3% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly above the aggregate lending data, at 28.4% by number and 17.4% by dollar, in addition to being below the 90.2% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 77.4% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 63.7% of loans by number and 32.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly above the aggregate lending data, at 38.0% by number and 31.6% by dollar, in addition to being below the 89.9% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 92.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T made a low level of community development loans. During the evaluation period, the bank did not make any community development loans in this assessment area. This was a decrease to the last evaluation, where the bank made one loan for \$500,000.

### **Innovative and/or Flexible Lending Practices**

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank's products and services in this assessment area were consistent with those discussed at the institution level.

## INVESTMENT TEST

M&T’s performance is rated Low Satisfactory in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank rarely used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made an adequate level of qualified community development investments and grants although rarely in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported seven qualified investments and grants totaling \$644,000 in this assessment area, which included one prior period investment with a current balance of \$615,000, and six grants totaling \$29,000. The bank did not have any new qualified investments in this assessment area. The community development activity in this assessment area represented 0.1% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments decreased since prior evaluation, with \$322,000 in annualized qualified investments over 24 months at this evaluation compared to \$1.3 million in annualized qualified investments at the previous evaluation. However, the bank compared favorably compared to other similarly situated banks that primarily served this assessment area. Specifically, based on annualized investments and grants to deposits the bank ranked 2<sup>nd</sup> of four, compared to similarly situated banks that primarily served this assessment area. The previous evaluation dollar volume was a result of one investment totaling \$6.6 million.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 19060 (Cumberland, MD-WV) Qualified Investments and Grants January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	1	615	0	0	0	0	0	0	1	615
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0
<b>Total Investments</b>	<b>1</b>	<b>615</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>615</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>29</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>29</b>
<b>Grand Total</b>	<b>1</b>	<b>615</b>	<b>6</b>	<b>29</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>644</b>

The following is an example of community development investment that benefited this assessment area:

- The bank’s prior period investment of \$615,000 consisted of a LIHTC. LIHTC investments provide a tax incentive for those funding the construction, purchase, or renovation of affordable housing for low-income individuals and families. With this investment, the bank supported affordable housing for LMI individuals.



## **Responsiveness to Credit and Community Development Needs**

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank's prior period qualified investment promoted affordable housing efforts, which is a community development need within this assessment area. Qualified grants promoted community services towards LMI individuals, which was also an identified community development need within the assessment area.

### **Community Development Initiatives**

The bank rarely used innovative and/or complex investments to support community development initiatives. The bank did not have any new investments over the evaluation period and the remainder of investment activity were donations.

## **SERVICE TEST**

M&T's performance is rated Low Satisfactory in the service test for this assessment area. Delivery systems were reasonably accessible to essentially all portions of the assessment area. To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Services did not vary in a way that inconvenienced portions of the assessment area, particularly low- and moderate-income census tracts or individuals. The bank provided an adequate level of community development services in this assessment area.

### **Retail Services**

#### *Accessibility of Delivery Systems*

Delivery systems were reasonably accessible to essentially all portions of the bank's assessment area. M&T operated seven full-service branches in this assessment area, of which one branch office (14.3%) was in an LMI census tract. The bank maintained a total of eight ATMs, one full-service ATM at six branches and one branch with two full-service ATMs, of which one ATM (12.5%) was in an LMI census tract. The bank's percentage of branches and ATMs were slightly below the percentage of LMI census tracts in this MSA (16.7%) and the percentage of the population residing in LMI census tracts (16.0%).

#### *Changes in Branch Locations*

To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened, closed, or relocated during the evaluation period.

#### *Reasonableness of Business Hours and Services*

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly in LMI census tracts or to LMI individuals. All of the seven branches offered weekend hours and six offered drive-thru hours including the branch located in a LMI census tract.

The bank's products and services in this assessment area were consistent with those discussed at the institution level.

### Community Development Services

M&T provided an adequate level of community development services in this assessment area. The bank provided four community development services during the evaluation period that primarily addressed community services. This activity accounted for 0.3% of the bank’s total number of community development services activity. On an annualized basis over 24 months, this represented a decrease as the bank conducted 2.0 community development services, compared to the previous year’s annualized performance of 5.7 community development services. However, this decrease can be attributed to the restrictions imposed due to COVID-19.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 19060 (Cumberland, MD-WV) Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	0	0	0	0	<b>0</b>
2021	0	4	0	0	<b>4</b>
<b>Total</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>4</b>

The following is an example of community development services that benefited this assessment area:

- Two bank employees served on the boards of organizations dedicated to providing various services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and emergency services to LMI populations within the assessment area.

## MULTISTATE METROPOLITAN AREA

### **CRA RATING FOR MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA): SATISFACTORY**

*The Lending Test is rated: **High Satisfactory***

*The Investment Test is rated: **High Satisfactory***

*The Service Test is rated: **High Satisfactory***

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected excellent responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.
- Exhibited an excellent record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made extensive use of innovative and/or flexible lending practices in order to serve assessment area credit needs.

#### INVESTMENT TEST

- Made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors.
- Exhibited good responsiveness to credit and community development needs.
- Significant use of innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were reasonably accessible to essentially all portions of the bank's assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided a relatively high level of community development services.

## SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this multistate assessment area as detailed in Appendix A.

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 115 of its 664 locations and 235 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 168 institutions operated 4,650 offices within this assessment area. M&T ranked 23<sup>rd</sup> with approximately \$14.0 billion in deposits, which represented 0.5% of the deposit market share and accounted for 10.8% of the bank’s total branch deposits. This assessment area generated approximately 16.9% by number and 28.1% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions such as JP Morgan Chase, Goldman Sachs, Bank of America, and Morgan Stanley.

## PERFORMANCE CONTEXT

### *Demographic Characteristics*

The MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment area included Bergen County, Essex County, Hudson County, Hunterdon County, Middlesex County, Monmouth County, Morris County, Ocean County, Passaic County, Somerset County, Union County, Bronx County, Kings County, Nassau County, New York County, Putnam County, Queens County, Richmond County, Rockland County, Suffolk County, and Westchester County. According to the 2015 ACS, the population of this assessment area was 19,105,076. The assessment area consisted of 4,483 census tracts, of which 495 or 11.0% were low-income, 960 or 21.4% were moderate-income, 1,472 or 32.8% were middle-income, 1,464 or 32.7% were upper-income, and 92 or 2.1% were of unknown-income.

### *Income Characteristics*

Based on the 2015 ACS, the MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment area had 4,502,447 families, of which 24.8% were low-income (11.4% of which were below the poverty level), 15.6% were moderate-income, 17.4% were middle-income, and 42.3% were upper-income.

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

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$87,360	\$98,920	13.2%
Bergen County, NJ	\$113,940	\$126,103	10.7%
Essex County, NJ	\$74,963	\$83,801	11.8%
Hudson County, NJ	\$68,216	\$80,756	18.4%
Hunterdon County, NJ	\$137,657	\$145,264	5.5%
Middlesex County, NJ	\$102,484	\$109,871	7.2%

Monmouth County, NJ	\$116,824	\$130,727	11.9%
Morris County, NJ	\$131,234	\$143,166	9.1%
Ocean County, NJ	\$84,056	\$92,401	9.9%
Passaic County, NJ	\$77,126	\$84,439	9.5%
Somerset County, NJ	\$130,189	\$142,098	9.6%
Union County, NJ	\$91,154	\$98,624	8.2%
Bronx County, NY	\$42,083	\$49,624	17.9%
Kings County, NY	\$58,789	\$71,985	22.5%
Nassau County, NY	\$125,277	\$139,459	11.3%
New York County, NY	\$97,557	\$114,659	17.5%
Putnam County, NY	\$121,740	\$122,394	0.5%
Queens County, NY	\$70,444	\$81,193	15.3%
Richmond County, NY	\$93,730	\$102,502	9.4%
Rockland County, NY	\$107,948	\$112,034	3.8%
Suffolk County, NY	\$112,079	\$123,117	9.9%
Westchester County, NY	\$118,116	\$126,992	7.5%
MD 35004 (Nassau County-Suffolk County, NY)	\$118,209	\$130,301	10.2%
MD 35154 (New Brunswick-Lakewood, NJ)	\$104,411	\$113,495	8.7%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	\$73,814	\$85,483	15.8%
MD 35084 (Newark, NJ-PA)	\$98,955	\$107,333	8.5%
State of New Jersey	\$96,513	\$104,804	8.6%
State of New York	\$78,570	\$87,270	11.1%
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey. 2016 - 2020 U.S. Census Bureau American Community Survey. Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### ***Housing Characteristics***

Based on the 2015 ACS data, the MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment area had 7,494,809 housing units, of which 46.1% were owner-occupied, 44.8% were rental, and 9.1% were vacant. Of the total housing units, 10.9% were located in low-income census tracts, 21.5% in moderate-income census tracts, 31.3% in middle-income census tracts, 36.1% in upper-income census tracts, and 0.2% in unknown-income census tracts. In low-income census tracts, 12.4% of housing units were owner-occupied, 78.4% were rental units, and 9.2% were vacant. In moderate-income census tracts, 28.9% of housing units were owner-occupied, 61.3% were rental units, and 9.8% were vacant.

The median age of housing stock in this assessment area was 61 years old, with 38.3% 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 2015 ACS, the median housing value in this assessment area was \$411,088 with an affordability ratio of 16.3. The median gross rent in the assessment area was \$1,267 per month.

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>			
<b>Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$411,088	16.3	\$1,267
Bergen County, NJ	\$441,100	19.5	\$1,348
Essex County, NJ	\$356,600	15.1	\$1,068
Hudson County, NJ	\$335,300	17.8	\$1,214
Hunterdon County, NJ	\$390,900	27.0	\$1,328
Middlesex County, NJ	\$323,300	24.6	\$1,299
Monmouth County, NJ	\$385,100	22.1	\$1,238
Morris County, NJ	\$423,400	23.7	\$1,357
Ocean County, NJ	\$262,700	23.6	\$1,322
Passaic County, NJ	\$336,100	17.8	\$1,184
Somerset County, NJ	\$399,000	25.2	\$1,411
Union County, NJ	\$345,500	20.1	\$1,174
Bronx County, NY	\$363,400	9.4	\$1,074
Kings County, NY	\$570,200	8.5	\$1,215
Nassau County, NY	\$446,400	22.3	\$1,578
New York County	\$848,700	8.6	\$1,519
Putnam County, NY	\$354,900	27.1	\$1,234
Queens County, NY	\$450,300	12.8	\$1,367
Richmond County, NY	\$439,500	16.7	\$1,169
Rockland County, NY	\$419,100	20.3	\$1,335
Suffolk County, NY	\$375,100	23.6	\$1,544
Westchester County, NY	\$506,900	16.6	\$1,364
MD 35004 (Nassau County-Suffolk County, NY)	\$406,895	22.9	\$1,559
MD 35084 (Newark, NJ-PA)	\$359,824	20.3	\$1,147
MD 35154 (New Brunswick-Lakewood, NJ)	\$329,678	23.6	\$1,303
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	\$461,711	12.9	\$1,261
State of New Jersey	\$315,900	22.8	\$1,192
State of New York	\$283,400	20.9	\$1,132

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

### ***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 47.7% of all rental households had rental costs that exceeded 30% of their incomes, 76.6% of low-income rental households had rental costs that exceeded 30% of their income, and 43.0% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 32.1% of homeowners had housing costs that exceeded 30% of their incomes, 78.1% of low-income homeowners had housing costs that exceeded 30% of their income, and 54.0% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>						
<b>Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	76.6%	43.0%	47.7%	78.1%	54.0%	32.1%
Bergen County, NJ	79.8%	52.0%	43.8%	87.4%	61.7%	31.9%
Essex County, NJ	75.7%	36.2%	50.4%	88.7%	72.2%	35.6%
Hudson County, NJ	76.9%	39.6%	42.1%	85.9%	66.9%	35.6%
Hunterdon County, NJ	82.1%	27.9%	43.6%	80.3%	47.5%	24.3%
Middlesex County, NJ	79.3%	40.0%	43.3%	79.7%	50.1%	28.6%
Monmouth County, NJ	78.4%	52.7%	49.3%	84.0%	56.8%	29.4%
Morris County, NJ	80.3%	55.8%	39.4%	86.1%	62.0%	26.6%
Ocean County, NJ	80.1%	49.9%	54.0%	66.8%	39.7%	30.6%
Passaic County, NJ	76.9%	34.4%	50.7%	87.7%	63.8%	36.6%
Somerset County, NJ	82.4%	43.5%	42.0%	82.8%	55.6%	26.0%
Union County, NJ	80.3%	39.1%	47.5%	90.3%	65.1%	32.9%
Bronx County, NY	76.3%	29.3%	55.2%	66.0%	44.5%	34.0%
Kings County, NY	76.0%	41.4%	48.6%	75.6%	51.0%	36.8%
Nassau County, NY	76.2%	52.5%	49.1%	82.4%	60.3%	33.4%
New York County, NY	70.6%	50.0%	41.1%	59.9%	41.0%	20.2%
Putnam County, NY	80.2%	49.8%	47.4%	80.0%	58.6%	32.2%
Queens County, NY	81.2%	48.1%	48.7%	73.0%	46.5%	35.6%
Richmond County, NY	70.1%	39.6%	46.4%	78.6%	52.8%	33.0%
Rockland County, NY	80.9%	44.0%	55.2%	84.6%	65.9%	35.8%
Suffolk County, NY	78.5%	53.0%	52.7%	81.5%	56.0%	34.3%
Westchester County, NY	77.9%	48.7%	49.6%	76.5%	59.8%	30.8%
MD 35004 (Nassau County-Suffolk County, NY)	77.4%	52.8%	51.0%	81.9%	57.9%	33.8%
MD 35154 (New Brunswick-Lakewood, NJ)	79.6%	45.7%	46.7%	75.7%	48.2%	29.0%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	76.2%	42.6%	47.5%	75.9%	52.2%	32.8%
MD 35084 (Newark, NJ-PA)	77.6%	40.3%	47.6%	86.6%	62.6%	30.4%
State of New Jersey	78.0%	43.2%	46.7%	81.6%	55.1%	30.0%
State of New York	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

\*Cost Burden is housing cost that equals 30% or more of household income.  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.

***Labor, Employment and Economic Characteristics***

According to D&B data, there were 949,527 businesses operating in this assessment area in 2021, of which 6.4% were located in low-income census tracts and 15.7% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 90.8% were small businesses with a GAR of \$1 million or less, of which 6.5% were located in low-income census tracts and 16.1% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.6% in 2019, increased to 10.4% in 2020, and decreased to 7.4% in 2021. The state of New York had an unemployment rate of 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021.

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.6%	10.4%	7.4%
Bergen County, NJ	2.8%	9.2%	6.0%
Essex County, NJ	4.2%	11.3%	8.0%
Hudson County, NJ	3.1%	10.2%	6.8%
Hunterdon County, NJ	2.6%	6.9%	4.6%
Middlesex County, NJ	3.0%	8.5%	5.7%
Monmouth County, NJ	3.0%	8.6%	5.5%
Morris County, NJ	2.7%	7.5%	5.0%
Ocean County, NJ	3.5%	9.1%	6.0%
Passaic County, NJ	4.1%	12.2%	8.4%
Somerset County, NJ	2.9%	7.5%	5.1%
Union County, NJ	3.5%	9.6%	6.7%
Bronx County, NY	5.2%	16.2%	13.6%
Kings County, NY	4.0%	12.6%	10.1%
Nassau County, NY	3.3%	8.0%	4.5%
New York County, NY	3.4%	9.6%	7.6%
Putnam County, NY	3.6%	7.2%	4.2%
Queens County, NY	3.4%	12.6%	9.6%
Richmond County, NY	3.7%	10.6%	8.7%
Rockland County, NY	3.4%	7.7%	4.4%
Suffolk County, NY	3.6%	8.1%	4.6%
Westchester County, NY	3.6%	8.0%	4.8%
MD 35004 (Nassau County-Suffolk County, NY)	3.4%	8.1%	4.5%
MD 35154 (New Brunswick-Lakewood, NJ)	3.1%	8.5%	5.6%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	3.7%	11.5%	8.7%
MD 35084 (Newark, NJ-PA)	3.5%	9.5%	6.6%
State of New Jersey	3.4%	9.5%	6.3%
State of New York	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 following MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) Assessment Area Demographics Table:

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>									
<b>Assessment Area Demographics</b>									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	495	11.0	487,619	10.8	170,980	35.1	1,115,030	24.8	
Moderate-income	960	21.4	947,560	21.0	173,933	18.4	702,189	15.6	
Middle-income	1,472	32.8	1,464,319	32.5	110,969	7.6	781,664	17.4	
Upper-income	1,464	32.7	1,599,262	35.5	58,128	3.6	1,903,564	42.3	
Unknown-income	92	2.1	3,687	0.1	571	15.5	0	0.0	
<b>Total Assessment Area</b>	<b>4,483</b>	<b>100.0</b>	<b>4,502,447</b>	<b>100.0</b>	<b>514,581</b>	<b>11.4</b>	<b>4,502,447</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%	
Low-income	820,343	101,614	2.9	12.4	643,249	78.4	75,480	9.2	
Moderate-income	1,611,915	466,252	13.5	28.9	988,095	61.3	157,568	9.8	
Middle-income	2,346,663	1,266,884	36.7	54.0	867,851	37.0	211,928	9.0	
Upper-income	2,704,038	1,618,855	46.8	59.9	851,033	31.5	234,150	8.7	
Unknown-income	11,850	2,681	0.1	22.6	7,631	64.4	1,538	13.0	
<b>Total Assessment Area</b>	<b>7,494,809</b>	<b>3,456,286</b>	<b>100.0</b>	<b>46.1</b>	<b>3,357,859</b>	<b>44.8</b>	<b>680,664</b>	<b>9.1</b>	
	Total Businesses by		Businesses by Tract & Revenue Size						
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
	#	%	#	%	#	%	#	%	
Low-income	60,635	6.4	56,096	6.5	4,052	5.1	487	6.1	
Moderate-income	149,245	15.7	138,459	16.1	9,785	12.4	1,001	12.6	
Middle-income	283,749	29.9	260,414	30.2	21,242	26.8	2,093	26.3	
Upper-income	444,301	46.8	398,691	46.2	41,350	52.2	4,260	53.5	
Unknown-income	11,597	1.2	8,744	1.0	2,730	3.4	123	1.5	
<b>Total Assessment Area</b>	<b>949,527</b>	<b>100.0</b>	<b>862,404</b>	<b>100.0</b>	<b>79,159</b>	<b>100.0</b>	<b>7,964</b>	<b>100.0</b>	
	<b>Percentage of Total Businesses:</b>			<b>90.8</b>		<b>8.3</b>		<b>.8</b>	
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>						
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
	#	%	#	%	#	%	#	%	
Low-income	126	3.6	120	3.5	6	6.3	0	0.0	
Moderate-income	430	12.3	417	12.3	13	13.5	0	0.0	
Middle-income	946	27.2	924	27.3	22	22.9	0	0.0	
Upper-income	1,960	56.3	1,903	56.2	54	56.3	3	100.0	
Unknown-income	21	0.6	20	0.6	1	1.0	0	0.0	
<b>Total Assessment Area</b>	<b>3,483</b>	<b>100.0</b>	<b>3,384</b>	<b>100.0</b>	<b>96</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	

	<b>Percentage of Total Farms:</b>	<b>97.2</b>		<b>2.8</b>		<b>.1</b>
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.</i>						

## Community Contact

Examiners conducted community contact interviews with two community organizations that serve this assessment area. The first community contact interview was held with a local community development organization located in Tarrytown, New York that serves both NY and NJ. The organization helped to create and fund affordable housing projects and services for low-income families in the tri-state area. The contact noted that affordable housing stock in the area is limited and that zoning laws in the metropolitan area are an obstacle for affordable housing projects. The contact also explained that low-income families are also burdened by a shortage of childcare centers. The contact stated that there is opportunity for financial institutions to partner with Community Development Financial Institutions (“CDFI”), provide homebuyer counseling and seminars, and provide flexible homebuyer programs.

The second community contact interview was with a New York based organization that created opportunities for low-income families to obtain affordable homes and provided services that strengthen low-income communities. Similarly, as mentioned above, the contact indicated that there is opportunity for financial institutions to provide homebuyer counseling seminars and to provide flexible homebuyer programs. The contact also expressed a growing need for banks to employ bilingual employees and cited language barriers as an obstacle to banking in the metro area.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 35620 (NEW YORK-NEWARK-JERSEY CITY, NY-NJ-PA)

### LENDING TEST

M&T’s performance is rated High Satisfactory in the lending test for this assessment area. The bank’s lending activity demonstrated excellent responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes. The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of this assessment area to low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank made extensive use of innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### Lending Activity

M&T’s lending activity demonstrated excellent responsiveness to the retail credit needs of this assessment area. This assessment area was highly competitive for financial services, with competitors including large financial institutions and regional banks. The bank’s market share of deposits slightly decreased over time; HMDA lending market share was generally stable, while small business market share increased during the evaluation period.

In 2021, the bank ranked 23<sup>rd</sup> out of 168 institutions with a deposit market share of 0.5%. In total HMDA lending, the bank ranked 25<sup>th</sup> out of 861 reporters with a market share of 0.8%, including market shares of 0.9% in home purchase lending, 0.6% in refinance, 3.7% in home improvement, and 0.5% in multifamily loans. M&T ranked 20<sup>th</sup> out of 437 reporters with a market share of 0.7% in small business lending.

In 2020, the bank ranked 21<sup>st</sup> out of 175 institutions with a deposit market share of 0.6%. In total HMDA lending, the bank ranked 25<sup>th</sup> out of 853 reporters with a market share of 0.9%, including market shares of 1.2% in home purchase lending, 0.6% in refinance, 3.4% in home improvement, and 0.5% in multifamily loans. M&T ranked 19<sup>th</sup> out of 459 reporters with a market share of 0.7% in small business lending.

In 2019, the bank ranked 21<sup>st</sup> out of 182 institutions with a deposit market share of 0.7%. In total HMDA lending, the bank ranked 24<sup>th</sup> out of 842 reporters with a market share of 0.9%, including market shares of 0.8% in home purchase lending, 0.7% in refinance, 2.5% in home improvement, and 0.7% in multifamily loans. M&T ranked 21<sup>st</sup> out of 323 reporters with a market share of 0.3% in small business lending.

M&T's lending in this assessment area is summarized in the table below:

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	1,856	12.0	231,402	3.0
Home Purchase	5,811	37.6	2,399,533	31.6
Loan Purpose Not Applicable	2,308	14.9	710,847	9.4
Multi-Family	134	0.9	2,061,210	27.1
Refinancing	5,361	34.7	2,191,441	28.9
<b>Total HMDA</b>	<b>15,470</b>	<b>54.5</b>	<b>7,594,433</b>	<b>82.7</b>
<b>Total Small Business</b>	<b>12,930</b>	<b>45.5</b>	<b>1,583,800</b>	<b>17.3</b>
<b>TOTAL LOAN</b>	<b>28,400</b>	<b>100.0</b>	<b>9,178,233</b>	<b>100.0</b>

### Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout this assessment area. Lending penetration in LMI tracts was excellent for home purchase, good for refinance, adequate for home improvement, adequate for multifamily, and adequate for small business.

### Gap Analysis

M&T demonstrated a good level of dispersion in low- and moderate-income census tracts in this assessment area. In 2019, the bank's performance was at 34.3% and 46.0%, in low- and moderate-income census tracts, respectively, and showed an increase in 2020, and remained the same 2021. Overall, performance in this assessment area showed improvement when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	495	325	34.3%
Moderate	960	518	46.0%
Middle	1,472	616	58.2%

Upper	1,464	488	66.7%
Income Unknown	92	82	10.9%
<b>2020</b>			
Low	495	250	49.5%
Moderate	960	355	63.0%
Middle	1,472	391	73.4%
Upper	1,464	293	80.0%
Income Unknown	92	76	17.4%
<b>2021</b>			
Low	495	256	48.3%
Moderate	960	364	62.1%
Middle	1,472	382	74.0%
Upper	1,464	303	79.3%
Income Unknown	92	77	16.3%

### ***Home Purchase Loans***

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 9.9% by number and 6.7% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 2.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.0% by number and 3.1% by dollar in low-income census tracts. In 2021, the bank made 20.0% of home purchase loans by number and 17.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 13.5% of owner-occupied housing units located in moderate-income census tracts and was above the aggregate, which made 14.8% by number and 12.0% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 9.0% by number and 7.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 2.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.8% by number and 2.9% by dollar in low-income census tracts. In 2020, the bank made 23.8% of home purchase loans by number and 21.3% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 13.5% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 14.4% by number and 11.5% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 6.3% by number and 6.1% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 2.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.1% by number and 3.2% by dollar in low-income census tracts. In 2019, the bank made 22.9% of home purchase loans by number and 17.0% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 13.5% of owner-occupied housing units located in moderate-income census tracts and was above the aggregate, which made 15.5% by number and 12.4% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 4.1% by number and 3.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was above the 2.9% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 3.3% by number and 3.0% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 15.1% by number and 13.5% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly above the 13.5% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 12.4% by number and 10.7% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 3.4% by number and 2.8% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was slightly above the 2.9% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 2.6% by number and 2.4% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 12.9% by number and 11.4% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 13.5% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 10.7% by number and 9.0% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 3.1% by number and 2.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was similar to the 2.9% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made 3.6% by number and 3.0% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 10.1% by number and 8.3% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 13.5% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 12.7% by number and 10.4% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 2.2% by number and 1.8% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was slightly below the 2.9% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 1.9% by number and 1.9% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 10.9% by number and 9.1% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was slightly below the 13.5% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 9.4% by number and 8.5% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 1.5% by number and 0.9% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 2.9% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 2.0% by number and 1.7% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 10.7% by number and 6.7% by dollar of home improvement

loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was slightly below the 13.5% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 9.3% by number and 8.3% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 4.5% by number and 4.2% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly above the 2.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.2% by number and 2.3% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 13.2% by number and 11.6% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was similar to the 13.5% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 10.2% by number and 9.5% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 17.1% by number and 1.0% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was similar to the 18.4% of multifamily housing units located in low-income census tracts and similar to the aggregate, which made 18.4% by number and 16.9% by dollar of multifamily loans in low-income census tracts. In 2021, the bank made 19.5% by number and 3.2% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was below the 25.7% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 32.7% by number and 29.0% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 11.4% by number and 6.2% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was below the 18.4% of multifamily housing units located in low-income census tracts and below the aggregate, which made 17.7% by number and 13.1% by dollar of multifamily loans in low-income census tracts. In 2020, the bank made 48.6% by number and 28.5% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 25.7% of multifamily housing units located in moderate-income census tracts and above the aggregate, which made 32.9% by number and 25.9% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank made 5.2% by number and 1.0% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly below the 18.4% of multifamily housing units located in low-income census tracts and significantly below the aggregate, which made 19.8% by number and 16.8% by dollar of multifamily loans in low-income census tracts. In 2019, the bank made 13.8% by number and 8.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was below the 25.7% of multifamily housing units located in moderate-income census tracts and significantly below the aggregate, which made 32.4% by number and 21.8% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 6.5% by number and 4.6% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 6.4% of businesses located in low-income census tracts and similar to the aggregate, which made 7.0% by number and 5.8% by dollar of small business loans in low-income census tracts. In 2021, the bank made 14.1% by number and 13.4% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 15.7% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 17.1% by number and 14.6% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 5.0% by number and 3.4% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 6.4% of businesses located in low-income census tracts and slightly below the aggregate, which made 6.5% by number and 5.4% by dollar of small business loans in low-income census tracts. In 2020, the bank made 13.2% by number and 12.3% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 15.7% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 15.7% by number and 13.7% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 5.5% by number and 4.0% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 6.3% of businesses located in low-income census tracts and slightly below the aggregate, which made 7.0% by number and 6.5% by dollar of small business loans in low-income census tracts. In 2019, the bank made 15.6% by number and 16.2% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 15.5% of businesses located in moderate-income census tracts and similar to the aggregate, which made 16.1% by number and 15.1% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to low- and moderate-income borrowers was adequate and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 2.7% by number and 1.0% by dollar to low-income borrowers and was significantly below the 24.8% of low-income families in the assessment area. Performance was slightly below aggregate lending, which made 3.2% by number and 1.4% by dollar to low-income families. The bank's lending to moderate-income borrowers was 17.1% by number and 12.0% by dollar, which was slightly above the aggregate performance of 14.5% by number, above 8.7% by dollar, and similar to the 15.6% moderate-income families in the assessment area.

In 2020, the bank made 3.4% by number and 1.5% by dollar to low-income borrowers and was significantly below the 24.8% of low-income families in the assessment area. Performance was slightly below aggregate lending, which made 3.8% by number and 1.7% by dollar to low-income families. The bank's lending to moderate-income borrowers was 18.5% by number and 13.3% by dollar, which was slightly above the aggregate performance of 15.5% by number, above 9.6% by dollar, and slightly above the 15.6% moderate-income families in the assessment area.

In 2019, the bank made 2.9% by number and 1.1% by dollar to low-income borrowers and was significantly below the 24.8% of low-income families in the assessment area. Performance was slightly below aggregate lending, which made 3.7% by number and 1.7% by dollar to low-income families. The bank's lending to moderate-income borrowers was 20.7% by number and 13.1% by dollar, which was above the aggregate performance of 14.9% by number, above 8.9% by dollar, and above the 15.6% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 2.6% by number and 1.1% by dollar and was slightly below the aggregate lending data, at 3.3% by number and 1.8% by dollar. The bank's performance was significantly below the 24.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 14.0% by number and 9.2% by dollar, was slightly above the aggregate lending data at 12.5% by number, slightly above 7.9% by dollar, and slightly below the 15.6% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 2.6% by number and 0.9% by dollar and was similar to the aggregate lending data, at 2.6% by number and 1.3% by dollar. The bank's performance was significantly below the 24.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 10.2% by number and 6.1% by dollar, was similar to the aggregate lending data at 10.4% by number, similar to 6.5% by dollar, and below the 15.6% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 4.5% by number and 1.6% by dollar and was similar to the aggregate lending data, at 4.1% by number and 2.0% by dollar. The bank's performance was significantly below the 24.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 10.3% by number and 5.1% by dollar, was similar to the aggregate lending data at 10.7% by number, slightly below 5.9% by dollar, and below the 15.6% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 4.6% by number and 2.1% by dollar and was slightly above the aggregate lending data, at 3.7% by number and 2.3% by dollar. The bank's performance was significantly below the 24.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 11.3% by number and 7.1% by dollar, was similar to the aggregate lending



data at 11.0% by number, similar to 7.0% by dollar, and below the moderate-income families in the assessment area at 15.6%.

In 2020, the bank's lending to low-income borrowers was 6.2% by number and 3.1% by dollar and was above the aggregate lending data, at 4.2% by number and 2.3% by dollar. The bank's performance was significantly below the 24.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 12.9% by number and 8.5% by dollar, was slightly above the aggregate lending data at 10.5% by number, above 6.5% by dollar, and slightly below the moderate-income families in the assessment area at 15.6%.

In 2019, the bank's lending to low-income borrowers was 5.3% by number and 2.3% by dollar and was above the aggregate lending data, at 4.1% by number and 2.2% by dollar. The bank's performance was significantly below the 24.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 15.1% by number and 10.6% by dollar, was above the aggregate lending data at 11.2% by number, significantly above 7.0% by dollar, and similar to the moderate-income families in the assessment area at 15.6%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 37.3% of loans by number and 20.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 38.7% by number and 19.7% by dollar, in addition to being significantly below the 90.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 76.1% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 37.5% of loans by number and 22.0% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 35.8% by number and 19.8% by dollar, in addition to being significantly below the 90.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 70.3% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 57.4% of loans by number and 34.0% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 44.2% by number and 27.8% by dollar, in addition to being below the 90.4% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 75.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 166 loans for approximately \$995.8 million. The community development lending in this assessment area represented 25.2% by dollar volume of the bank’s total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$497.9 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$602.0 million, lending activity represented a decrease by dollar volume in performance. However, based on annualized community development loans to deposits, the bank ranked 1<sup>st</sup> out of five compared to similarly situated banks that primarily served this multistate assessment area.

The institution’s community development loans by year and purpose are summarized in the table below.

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>										
<b>Community Development Lending</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	12	92,156	27	145,516	0	0	56	274,302	<b>95</b>	<b>511,974</b>
2021	16	125,712	20	229,320	6	8,667	29	120,085	<b>71</b>	<b>483,784</b>
<b>Total</b>	<b>28</b>	<b>217,868</b>	<b>47</b>	<b>374,836</b>	<b>6</b>	<b>8,667</b>	<b>85</b>	<b>394,386</b>	<b>166</b>	<b>995,758</b>

Examples of community development lending that benefited the area included the following:

- In 2020, the bank made a \$20.3 million loan to fund new construction of a multi-family building. This project contained a percentage of units dedicated to LMI individuals. With this loan, the bank helped to support affordable housing.
- In 2021, the bank made six SBA 504 loans totaling \$8.7 million. This financing program offered by SBA promoted business growth and job creation through the purchase or improvement of real estate, equipment, and other fixed assets. With these loans, the bank helped to promote economic development.
- In 2020 and 2021, the bank originated 76 PPP loans in amounts greater than \$1 million, totaling approximately \$171.7 million to businesses in LMI census tracts, which helped to revitalize and stabilize these communities.

### Innovative and/or Flexible Lending Practices

The bank made extensive use innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

Additionally, the bank offered these programs in the state of New York:

- Low Interest Rate Program: A below market rate program designed for first-time homebuyers who meet the State of New York Mortgage Agency (SONYMA) purchase price and income limits and are purchasing an existing property.
- Achieving the Dream: A below market interest rate program designed for low-income first-time homebuyers with a low down payment purchasing in a SONYMA target area. This program has lower minimum income, purchase price, and appraised value limits compared to the Low Interest Rate Program.
- SONYMA's Down Payment Assistance Loan (DPAL): A SONYMA second mortgage program designed to assist homebuyers with down payment assistance. Any additional funds available after the down payment is covered can be applied towards closing costs and prepaid items.
- Construction Incentive Program: A program designed for first-time homebuyers buying a newly constructed home and meet SONYMA Income and Purchase price limitations.
- Conventional Plus: This program combines the flexibility offered by Fannie Mae's My Community Mortgage along with SONYMA's DPAL. It is designed for borrowers whose income is at or below program limits.
- FHA Plus: This program provides the flexibility offered by FHA mortgages along with SONYMA's DPAL.
- Remodel NY: This below market rate program is designed for first-time homebuyers purchasing an existing home for renovation and who meet SONYMA Income and Purchase price limitations.
- Neighborhood Revitalization: This is an additional \$20,000 in funding for borrowers purchasing a home in targeted areas as set by SONYMA.

## INVESTMENT TEST

M&T's performance is rated High Satisfactory in the investment test for this assessment area. The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibited good responsiveness to assessment area credit and community development needs. The bank made significant use of innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 690 qualified investments and grants totaling \$264.9 million in this assessment area, which included 22 new investments for \$27.8 million, 352 prior period investments with a current balance of \$233.2 million, and 316 grants for \$4.0 million. The community development activity in this assessment area represented 20.5% by dollar volume of the bank's total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance increased since prior evaluation, with \$132.5 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$107.3 million at the previous evaluation. Based on annualized investments and grants to deposits, although the bank ranked 3<sup>rd</sup> out of five compared to

similarly situated banks that primarily served this multistate assessment area, the performance was primarily driven by prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	339	103,918	5	46,627	2	4,809	6	77,852	<b>352</b>	<b>233,205</b>
2020	1	37	4	408	5	1,084	0	0	<b>10</b>	<b>1,528</b>
2021	3	24,853	4	408	5	990	0	0	<b>12</b>	<b>26,251</b>
<b>Total Investments</b>	<b>343</b>	<b>128,808</b>	<b>13</b>	<b>47,442</b>	<b>12</b>	<b>6,882</b>	<b>6</b>	<b>77,852</b>	<b>374</b>	<b>260,984</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>316</b>	<b>3,952</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>316</b>	<b>3,952</b>
<b>Grand Total</b>	<b>343</b>	<b>128,808</b>	<b>329</b>	<b>51,394</b>	<b>12</b>	<b>6,882</b>	<b>6</b>	<b>77,852</b>	<b>690</b>	<b>264,936</b>

The following are examples of community development investments that benefited this assessment area:

- From 2020 to 2021, the bank made ten investments totaling \$2.1 million, in SBICs. An SBIC is a privately-owned and operated company that makes long-term investments in small businesses and is licensed by the SBA. SBICs offer equity and debt financing to small businesses. With these investments, the bank supported economic development.
- From 2020 to 2023, the bank made four investments totaling \$24.8 million, in mortgage-backed securities that were used to build properties that qualified for LIHTCs. LIHTCs are a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments, the bank supported affordable housing for LMI individuals.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited good responsiveness to assessment area credit and community development needs. Of the bank’s new qualified investments, 18.2% primarily promoted affordable housing efforts, and 45.5% provided economic development, which are a community development needs within this assessment area. Qualified grants promoted community services towards LMI individuals, which was also an identified community development need within this assessment area.

### **Community Development Initiatives**

The bank made significant use of innovative and/or complex investments to support community development initiatives. New investments consisted of a mix of LIHTC, SBIC, CDCU, and Rehab Tax Credits. The prior period investments also included mortgage-backed securities and bonds.

## **SERVICE TEST**

M&T's performance is rated High Satisfactory in the service test for this assessment area. Delivery systems were reasonably accessible to essentially all portions of the assessment area. To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. The bank provided a relatively high level of community development services in this assessment area.

### **Retail Services**

#### *Accessibility of Delivery Systems*

Delivery systems were reasonably accessible to essentially all portions of the bank's assessment area. M&T operated 115 full-service branches in this assessment area, of which 26 branch offices (22.6%) were in LMI census tracts. The bank maintained a total of 235 ATMs, 1 full-service ATM at each branch, except for nine branches that had 2 full-service ATMs each, and 111 stand-alone ATMs primarily located in gas stations. Of the ATMs, 49 (20.9%) were located in LMI census tracts. Although the bank's percentage of branches and ATMs were below the percentage of LMI census tracts in this MSA (32.5%) and the percentage of the population residing in LMI census tracts (34.1%), 43 of the bank's branches were adjacent to LMI census tracts, which improved accessibility.

#### *Changes in Branch Locations*

To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Although there were no relocations, the bank closed 18 branches during the evaluation period in this assessment area. Of the closed branches, only two were in LMI census tracts; however, six additional closed branches were adjacent to LMI census tracts. Thus, these branch closures negatively affected the accessibility of the bank's delivery systems in LMI geographies.

#### *Reasonableness of Business Hours and Services*

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. None of the branches offered extended hours; 33 (26.7%) branches, including 9 (34.6%) in LMI census tracts, offered weekend hours, and 54 (47.0%) branches, including 10 (38.5%) in LMI census tracts, offered drive-thru hours.

The bank's products and services in this assessment area were consistent with those discussed at the institution level.

### **Community Development Services**

M&T provided a relatively high level of community development services in this assessment area. The bank conducted 252 services during the evaluation period that primarily addressed community services. This activity accounted for 15.9% of the bank's total number of community development services activity. On an annualized basis over 24 months, the activity represented a decrease as the bank conducted 126 community development services, compared to the previous year's annualized performance of 513.3 community development services. However, this decrease can be attributed to the restrictions imposed due

to COVID-19. Additionally, the bank had 948 community development service hours during the evaluation period, which on an annualized basis was 474 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)</b>					
<b>Community Development Services</b>					
<b>January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	6	36	2	0	<b>44</b>
2021	52	155	1	0	<b>208</b>
<b>Total</b>	<b>58</b>	<b>191</b>	<b>3</b>	<b>0</b>	<b>252</b>

The following are examples of community development services that benefited this assessment area:

- In 2020 and 2021, twenty-eight bank employees served on boards of organizations dedicated to providing various services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and emergency services to LMI populations within this assessment area.
- In 2020 and 2021, seven bank employees served on boards of nonprofit organizations that promoted affordable housing services. The organizations provided home lending education, financially literacy services, and home counseling services to disadvantaged LMI individuals.

## MULTISTATE METROPOLITAN AREA

### **CRA RATING FOR MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD): OUTSTANDING**

*The Lending Test is rated: **Outstanding***

*The Investment Test is rated: **High Satisfactory***

*The Service Test is rated: **High Satisfactory***

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

#### INVESTMENT TEST

- Made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors.
- Exhibited good responsiveness to credit and community development needs.
- Occasionally used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were accessible to essentially all portions of the assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided a relatively high level of community development services.

## SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this multistate assessment area as detailed in Appendix A.

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 36 of its 664 locations and 91 of its 1,882 ATMs in this assessment area during evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 104 institutions operated 1,532 offices within this assessment area. M&T ranked 12<sup>th</sup> with approximately \$6.6 billion in deposits, which represented 1.1% of the deposit market share and accounted for 5.1% of the bank’s total branch deposits. This assessment area generated approximately 6.4% by number and 7.4% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions such as Capital One, TD Bank, Wells Fargo, and PNC Bank.

## PERFORMANCE CONTEXT

### *Demographic Characteristics*

The MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area included New Castle County, Cecil County, Burlington County, Camden County, Gloucester County, Bucks County, Chester County, Delaware County, Montgomery County, and Philadelphia County. According to the 2015 ACS, the population of this assessment area was 5,970,560. The assessment area consisted of 1,452 census tracts, of which 100 or 6.9% were low-income, 343 or 23.6% were moderate-income, 550 or 37.9% were middle-income, 439 or 30.2% were upper-income, and 20 or 1.4% were of unknown-income.

### *Income Characteristics*

Based on the 2015 ACS, the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area had 1,429,245 families, of which 22.0% were low-income (9.2% of which were below the poverty level), 17.3% were moderate-income, 20.0% were middle-income, 40.8% were upper-income and 0.0% were unknown-income.

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

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$87,660	\$94,860	8.2%
New Castle County, DE	\$88,824	\$93,884	5.7%
Cecil County, MD	\$87,566	\$93,589	6.9%
Burlington County, NJ	\$103,668	\$108,248	4.4%
Camden County, NJ	\$85,400	\$89,417	4.7%
Gloucester County, NJ	\$100,028	\$108,479	8.5%



Bucks County, PA	\$103,743	\$111,488	7.5%
Chester County, PA	\$115,344	\$126,738	9.9%
Delaware County, PA	\$90,581	\$99,246	9.6%
Montgomery County, PA	\$109,408	\$116,171	6.2%
Philadelphia County, PA	\$51,203	\$58,090	13.5%
MD 15804 (Camden, NJ)	\$95,199	\$100,987	6.1%
MD 33874 (Montgomery County- Bucks County-Chester County, PA)	\$109,191	\$117,345	7.5%
MD 37964 (Philadelphia, PA)	\$61,633	\$68,458	11.1%
MD 48864 (Wilmington, DE-MD-NJ)	\$88,179	\$93,347	5.9%
State of Delaware	\$79,750	\$84,825	6.4%
State of Maryland	\$98,429	\$105,790	7.5%
State of New Jersey	\$96,513	\$104,804	8.6%
Commonwealth of Pennsylvania	\$74,468	\$80,996	8.8%

*Source: 2011 - 2015 U.S. Census Bureau American Community Survey.  
2016 - 2020 U.S. Census Bureau American Community Survey.  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

### ***Housing Characteristics***

Based on the 2015 ACS data, the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area had 2,416,753 housing units, of which 61.7% were owner-occupied, 29.6% were rental, and 8.7% were vacant. Of the total housing units, 6.8% were located in low-income census tracts, 23.4% in moderate-income census tracts, 38.8% in middle-income census tracts, 30.8% in upper-income census tracts, and 0.2% in unknown-income census tracts. In low-income census tracts, 32.6% of housing units were owner-occupied, 50.7% were rental units, and 16.7% were vacant. In moderate-income census tracts, 47.7% of housing units were owner-occupied, 39.7% were rental units, and 12.6% were vacant.

The median age of housing stock in this assessment area was 58 years old, with 30.7% 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 2015 ACS, the median housing value in this assessment area was \$237,282 with an affordability ratio of 26.4. The median gross rent in the assessment area was \$1,019 per month.

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>			
<b>Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$237,282	26.4	\$1,019
New Castle County, DE	\$242,400	27.0	\$1,038
Cecil County, MD	\$242,900	27.3	\$996
Burlington County, NJ	\$245,000	32.1	\$1,207
Camden County, NJ	\$196,800	31.6	\$978
Gloucester County, NJ	\$214,500	35.8	\$1,072
Bucks County, PA	\$308,800	25.1	\$1,137
Chester County, PA	\$325,800	26.4	\$1,197
Delaware County, PA	\$232,700	28.0	\$983

Montgomery County, PA	\$292,300	27.6	\$1,158
Philadelphia County, PA	\$145,300	26.3	\$922
MD 15804 (Camden, NJ)	\$218,212	32.8	\$1,070
MD 33874 (Montgomery County-Bucks County-Chester County, PA)	\$305,163	26.5	\$1,160
MD 37964 (Philadelphia, PA)	\$165,981	26.4	\$933
MD 48864 (Wilmington, DE-MD-NJ)	\$237,351	27.5	\$1,027
State of Delaware	\$231,500	26.1	\$1,018
State of Maryland	\$286,900	26.0	\$1,230
State of New Jersey	\$315,900	22.8	\$1,192
Commonwealth of Pennsylvania	\$166,000	32.3	\$840

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

### ***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 45.6% of all rental households had rental costs that exceeded 30% of their income, 76.2% of low-income rental households had rental costs that exceeded 30% of their income, and 38.6% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 23.9% of homeowners had housing costs that exceeded 30% of their income, 67.8% of low-income homeowners had housing costs that exceeded 30% of their income, and 38.9% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>						
<b>Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	76.2%	38.6%	45.6%	67.8%	38.9%	23.9%
New Castle County, DE	75.9%	36.8%	41.8%	62.7%	35.7%	20.3%
Cecil County, MD	80.2%	38.5%	46.0%	60.5%	33.4%	20.3%
Burlington County, NJ	84.2%	53.7%	44.3%	82.5%	51.4%	26.5%
Camden County, NJ	76.8%	36.8%	49.6%	81.0%	49.6%	28.4%
Gloucester County, NJ	77.9%	45.1%	48.5%	82.6%	50.0%	26.1%
Bucks County, PA	79.6%	45.4%	45.2%	75.3%	48.0%	24.2%
Chester County, PA	77.4%	44.2%	40.2%	75.6%	47.6%	20.6%
Delaware County, PA	77.8%	31.8%	44.7%	71.7%	38.7%	23.1%
Montgomery County, PA	80.8%	44.4%	41.7%	74.5%	44.4%	21.1%
Philadelphia County, PA	73.3%	33.0%	48.0%	57.2%	22.9%	26.0%
MD 15804 (Camden, NJ)	78.8%	44.2%	47.6%	81.9%	50.3%	27.1%
MD 33874 (Montgomery County-Bucks County-Chester County, PA)	79.6%	44.6%	42.3%	75.1%	46.4%	22.0%

MD 37964 (Philadelphia, PA)	74.0%	32.7%	47.4%	59.8%	27.0%	25.1%
MD 48864 (Wilmington, DE-MD-NJ)	76.5%	36.4%	43.3%	63.6%	35.8%	20.8%
State of Delaware	75.8%	42.8%	43.4%	64.0%	35.2%	21.2%
State of Maryland	77.2%	44.4%	45.2%	66.6%	39.4%	22.1%
State of New Jersey	78.0%	43.2%	46.7%	81.6%	55.1%	30.0%
Commonwealth of Pennsylvania	72.3%	31.7%	42.0%	61.5%	28.9%	19.6%
*Cost Burden is housing cost that equals 30% or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.						

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 298,775 businesses operating in this assessment area in 2021, of which 4.0% were located in low-income census tracts and 18.0% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.4% were small businesses with a GAR of \$1 million or less, of which 4.0% were located in low-income census tracts and 18.0% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.1% in 2019, increased to 9.1% in 2020, and decreased to 6.3% in 2021. The Commonwealth of Pennsylvania had an unemployment rate of 4.5% in 2019, increased to 9.1% in 2020, and decreased to 6.3% in 2021.

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.1%	9.1%	6.3%
New Castle County, DE	3.6%	7.5%	5.3%
Cecil County, MD	3.8%	5.9%	5.2%
Burlington County, NJ	3.1%	7.9%	5.3%
Camden County, NJ	3.9%	9.7%	6.8%
Gloucester County, NJ	3.5%	8.9%	6.0%
Bucks County, PA	3.9%	8.3%	5.3%
Chester County, PA	3.3%	6.4%	4.2%
Delaware County, PA	4.2%	9.2%	6.3%
Montgomery County, PA	3.6%	7.6%	5.0%
Philadelphia County, PA	5.7%	12.4%	9.2%
MD 15804 (Camden, NJ)	3.5%	8.9%	6.0%
MD 33874 (Montgomery County-Bucks County-Chester County, PA)	3.6%	7.5%	4.9%
MD 37964 (Philadelphia, PA)	5.2%	11.5%	8.3%
MD 48864 (Wilmington, DE-MD-NJ)	3.7%	7.4%	5.5%
State of Delaware	3.7%	7.6%	5.3%
State of Maryland	3.4%	6.7%	5.8%
State of New Jersey	3.4%	9.5%	6.3%

Commonwealth of Pennsylvania	4.5%	9.1%	6.3%
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics.</i>			

Additional performance context data for this assessment area is provided in the following MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) Assessment Area Demographics Table:

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) Assessment Area Demographics</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	100	6.9	82,575	5.8	31,805	38.5	313,818	22.0
Moderate-income	343	23.6	295,032	20.6	49,582	16.8	246,741	17.3
Middle-income	550	37.9	578,452	40.5	34,748	6.0	285,747	20.0
Upper-income	439	30.2	471,872	33.0	14,221	3.0	582,939	40.8
Unknown-income	20	1.4	1,314	0.1	518	39.4	0	0.0
<b>Total Assessment Area</b>	<b>1,452</b>	<b>100.0</b>	<b>1,429,245</b>	<b>100.0</b>	<b>130,874</b>	<b>9.2</b>	<b>1,429,245</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	165,229	53,887	3.6	32.6	83,782	50.7	27,560	16.7
Moderate-income	566,483	270,364	18.1	47.7	224,974	39.7	71,145	12.6
Middle-income	937,681	627,683	42.1	66.9	243,672	26.0	66,326	7.1
Upper-income	743,233	539,441	36.2	72.6	159,208	21.4	44,584	6.0
Unknown-income	4,127	198	0.0	4.8	3,431	83.1	498	12.1
<b>Total Assessment Area</b>	<b>2,416,753</b>	<b>1,491,573</b>	<b>100.0</b>	<b>61.7</b>	<b>715,067</b>	<b>29.6</b>	<b>210,113</b>	<b>8.7</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	11,939	4.0	10,954	4.0	910	3.9	75	2.9
Moderate-income	53,897	18.0	49,213	18.0	4,206	18.1	478	18.8
Middle-income	117,513	39.3	107,236	39.3	9,261	39.8	1,016	39.9
Upper-income	113,980	38.1	104,433	38.3	8,582	36.8	965	37.9
Unknown-income	1,446	0.5	1,097	0.4	339	1.5	10	0.4
<b>Total Assessment Area</b>	<b>298,775</b>	<b>100.0</b>	<b>272,933</b>	<b>100.0</b>	<b>23,298</b>	<b>100.0</b>	<b>2,544</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.4</b>		<b>7.8</b>		<b>.9</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	21	1.0	20	1.0	1	0.8	0	0.0
Moderate-income	244	11.2	232	11.3	12	9.1	0	0.0
Middle-income	1,085	49.6	1,014	49.3	71	53.8	0	0.0

Upper-income	835	38.2	787	38.3	48	36.4	0	0.0
Unknown-income	3	0.1	3	0.1	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>2,188</b>	<b>100.0</b>	<b>2,056</b>	<b>100.0</b>	<b>132</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>94.0</b>		<b>6.0</b>		<b>.0</b>
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.</i>								

## Community Contact

Examiners conducted community contact interviews with two community organizations that served this assessment area. The first community contact interview was with an organization that provided affordable housing and advocated for the poorest families in Philadelphia. The contact explained that economic conditions were much worse after COVID-19, and they are expecting a wave of evictions. The contact cautioned that low-income housing, such as those being built with the assistance of LIHTC investments, is not affordable for their tenants. The organization would like to see the banks invest in more progressive projects, including learning more about community land trusts, which could help create long-term affordable housing.

A second community contact interview was conducted with an organization that focused on repairing existing homes to help keep current owners in their home. The contact stated that the cost of home repairs continues to increase, making their mission more difficult. The contact also explained that the Philadelphia area has had very steady growth the last couple of years, and they expect steady growth in the next couple of years. However, there is a lack of economic opportunity for individuals who grew up in Philadelphia because of lack of school funding and low paying jobs. The organization believes that it is still difficult to be a “banked person” in these neighborhoods due to lack of branches.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 37980 (PHILADELPHIA-CAMDEN-WILMINGTON, PA-NJ-DE-MD)

### LENDING TEST

M&T’s performance is rated Outstanding in the lending test for this assessment area. The bank’s lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of this assessment area to low-income individuals, and/or very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### Lending Activity

M&T’s lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. This assessment area was competitive for financial services, with competitors including large financial institutions and regional banks. M&T’s market share of deposits and lending market share was stable during the evaluation period.

In 2021, the bank ranked 12<sup>th</sup> out of 104 institutions with a deposit market share of 1.1%. In total HMDA lending, the bank ranked 43<sup>rd</sup> out of 907 reporters with a market share of 0.5%, including market shares of

0.4% in home purchase lending, 0.4% in refinance, 2.1% in home improvement, and 0.3% in multifamily loans. M&T ranked 22<sup>nd</sup> out of 316 reporters with a market share of 1.1% in small business lending.

In 2020, the bank ranked 11<sup>th</sup> out of 107 institutions with a deposit market share of 1.0%. In total HMDA lending, the bank ranked 47<sup>th</sup> out of 892 reporters with a market share of 0.5%, including market shares of 0.7% in home purchase lending, 0.3% in refinance, 1.9% in home improvement, and 0.5% in multifamily loans. M&T ranked 19<sup>th</sup> out of 334 reporters with a market share of 1.6% in small business lending.

In 2019, the bank ranked 12<sup>th</sup> out of 108 institutions with a deposit market share of 1.1%. In total HMDA lending, the bank ranked 41<sup>st</sup> out of 838 reporters with a market share of 0.6%, including market shares of 0.5% in home purchase lending, 0.5% in refinance, 1.9% in home improvement, and 0.6% in multifamily loans. M&T ranked 21<sup>st</sup> out of 233 reporters with a market share of 0.7% in small business lending.

M&T's lending in this assessment area is summarized in the table below.

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	805	15.8%	67,179	4.0%
Home Purchase	1,725	33.8%	437,700	26.1%
Loan Purpose Not Applicable	957	18.7%	151,803	9.0%
Multi-Family	24	0.5%	631,008	37.6%
Refinancing	1,598	31.3%	390,160	23.3%
<b>Total HMDA</b>	<b>5,109</b>	<b>47.6%</b>	<b>1,677,850</b>	<b>69.1%</b>
<b>Total Small Business</b>	<b>5,627</b>	<b>52.4%</b>	<b>750,811</b>	<b>30.9%</b>
<b>Total Small Farm</b>	<b>2</b>	<b>0.0%</b>	<b>428</b>	<b>0.0%</b>
<b>TOTAL LOAN</b>	<b>10,738</b>	<b>100.0%</b>	<b>2,429,089</b>	<b>100.0%</b>

### Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area. Lending penetration in LMI tracts was excellent for home purchase, adequate for refinance, adequate for home improvement, adequate for multifamily, and good for small business loans.

### Gap Analysis

M&T demonstrated a good level of dispersion LMI census tracts in this assessment area. In 2019, the bank's performance was at 41.0% and 52.5%, in LMI census tracts, respectively, and showed an increase in 2020, and similar performance in 2021. Overall, performance in this assessment area was similar to performance in the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	100	59	41.0%

Moderate	343	163	52.5%
Middle	550	233	57.6%
Upper	439	167	62.0%
Income Unknown	20	18	10.0%
<b>2020</b>			
Low	100	51	49.0%
Moderate	343	97	71.7%
Middle	550	107	80.5%
Upper	439	87	80.2%
Income Unknown	20	18	10.0%
<b>2021</b>			
Low	100	52	48.0%
Moderate	343	113	67.1%
Middle	550	157	71.5%
Upper	439	96	78.1%
Income Unknown	20	17	15.0%

### *Home Purchase Loans*

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 4.2% by number and 2.3% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was slightly above the 3.6% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 3.0% by number and 1.9% by dollar in low-income census tracts. In 2021, the bank made 20.8% of home purchase loans by number and 15.9% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly above the 18.1% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 19.4% by number and 14.3% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 5.0% by number and 2.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 3.6% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.6% by number and 1.6% by dollar in low-income census tracts. In 2020, the bank made 28.7% of home purchase loans by number and 21.0% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 18.1% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 18.7% by number and 14.0% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 4.9% by number and 2.7% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 3.6% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.6% by number and 1.6% by dollar in low-income census tracts. In 2019, the bank made 30.9% of home purchase loans by number and 23.6% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 18.1% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 19.2% by number and 14.2% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 1.5% by number and 0.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 3.6% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 1.4% by number and 0.9% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 18.4% by number and 12.8% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 18.1% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 13.5% by number and 9.7% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 1.0% by number and 0.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 3.6% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 1.1% by number and 0.7% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 12.9% by number and 8.4% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 18.1% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 11.6% by number and 8.6% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 0.9% by number and 0.2% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 3.6% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate, which made 1.7% by number and 1.1% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 11.5% by number and 5.7% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 18.1% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 14.2% by number and 10.1% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 2.3% by number and 1.3% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 3.6% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 2.2% by number and 1.5% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 15.3% by number and 10.7% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was slightly below the 18.1% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 14.0% by number and 10.2% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank did not make any home improvement loans in low-income census tracts. The bank made 12.7% by number and 9.0% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 18.1% of owner-



occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 13.3% by number and 10.0% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 0.7% by number and 0.3% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 3.6% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate, which made 2.0% by number and 1.5% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 11.2% by number and 7.9% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 18.1% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 14.5% by number and 11.0% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected adequate penetration throughout the assessment area.

In 2021, the bank did not make any multifamily loans in low-income census tracts. The bank made 20.0% by number and 0.5% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was slightly below the 24.5% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 36.8% by number and 30.8% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 11.1% by number and 2.1% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 6.5% of multifamily housing units located in low-income census tracts and slightly below the aggregate, which made 13.3% by number and 8.5% by dollar of multifamily loans in low-income census tracts. In 2020, the bank made 22.2% by number and 6.2% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was similar to the 24.5% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 32.7% by number and 24.9% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank made 10.0% by number and 6.2% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 6.5% of multifamily housing units located in low-income census tracts and below the aggregate, which made 12.9% by number and 6.7% by dollar of multifamily loans in low-income census tracts. In 2019, the bank made 40.0% by number and 44.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 24.5% of multifamily housing units located in moderate-income census tracts and similar to the aggregate, which made 38.0% by number and 23.5% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 2.6% by number and 2.9% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was below the 4.0% of businesses located in low-income census tracts and below the aggregate, which made 3.6% by number and 3.5% by dollar of small business loans in low-income census tracts. In 2021, the bank made 17.7% by

number and 16.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 18.0% of businesses located in moderate-income census tracts and similar to the aggregate, which made 17.7% by number and 17.5% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 2.8% by number and 4.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was below the 4.0% of businesses located in low-income census tracts and slightly below the aggregate, which made 3.3% by number and 3.3% by dollar of small business loans in low-income census tracts. In 2020, the bank made 18.8% by number and 20.3% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 18.0% of businesses located in moderate-income census tracts and slightly above the aggregate, which made 16.4% by number and 16.8% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 2.6% by number and 3.9% by dollar of small business loans in low-income census tracts. The bank's small business lending performance by number in low-income census tracts was below the 3.9% of businesses located in low-income census tracts and slightly below the aggregate, which made 3.3% by number and 3.3% by dollar of small business loans in low-income census tracts. In 2019, the bank made 18.0% by number and 21.5% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 17.4% of businesses located in moderate-income census tracts and similar to the aggregate, which made 17.1% by number and 17.9% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 9.7% by number and 6.1% by dollar to low-income borrowers and was significantly below the 22.0% of low-income families in the assessment area. Performance was slightly above aggregate lending, which made 8.4% by number and 4.8% by dollar to low-income families. The bank's lending to moderate-income borrowers was 26.7% by number and 22.9% by dollar, which was above the aggregate performance of 21.2% by number, above 16.1% by dollar, and significantly above the 17.3% moderate-income families in the assessment area.

In 2020, the bank made 15.9% by number and 9.5% by dollar to low-income borrowers and was below the 22.0% of low-income families in the assessment area. Performance was above aggregate lending, which made 10.8% by number and 6.4% by dollar to low-income families. The bank's lending to moderate-income borrowers was 28.4% by number and 22.2% by dollar, which was slightly above the aggregate performance of 24.5% by number, slightly above 19.3% by dollar, and significantly above the 17.3% moderate-income families in the assessment area.

In 2019, the bank made 12.5% by number and 6.6% by dollar to low-income borrowers and was below the 22.0% of low-income families in the assessment area. Performance was above aggregate lending, which

made 9.2% by number and 5.2% by dollar to low-income families. The bank's lending to moderate-income borrowers was 26.0% by number and 20.0% by dollar, which was slightly above the aggregate performance of 21.7% by number, slightly above 16.5% by dollar, and significantly above the 17.3% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 8.0% by number and 3.8% by dollar and was above the aggregate lending data, at 6.2% by number and 3.6% by dollar. The bank's performance was significantly below the 22.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 22.2% by number and 15.4% by dollar, was above the aggregate lending data at 16.2% by number, above 12.2% by dollar, and above the 17.3% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 9.4% by number and 4.4% by dollar and was significantly above the aggregate lending data, at 5.0% by number and 2.8% by dollar. The bank's performance was significantly below the 22.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 18.0% by number and 10.5% by dollar, was slightly above the aggregate lending data at 15.1% by number, similar to 11.4% by dollar, and similar to the 17.3% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 9.2% by number and 3.8% by dollar and was above the aggregate lending data, at 7.0% by number and 3.8% by dollar. The bank's performance was significantly below the 22.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 20.1% by number and 10.2% by dollar, was above the aggregate lending data at 15.2% by number, similar to 10.9% by dollar, and slightly above the 17.3% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 10.0% by number and 7.6% by dollar and was above the aggregate lending data, at 7.0% by number and 5.0% by dollar. The bank's performance was significantly below the 22.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 20.9% by number and 16.0% by dollar, was above the aggregate lending data at 16.1% by number, above 12.6% by dollar, and slightly above the moderate-income families in the assessment area at 17.3%.

In 2020, the bank's lending to low-income borrowers was 11.0% by number and 6.6% by dollar and was above the aggregate lending data, at 7.9% by number and 5.4% by dollar. The bank's performance was significantly below the 22.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 20.6% by number and 15.6% by dollar, was slightly above the aggregate lending data at 17.3% by number, slightly above 13.2% by dollar, and slightly above the moderate-income families in the assessment area at 17.3%.

In 2019, the bank's lending to low-income borrowers was 8.7% by number and 6.0% by dollar and was similar to the aggregate lending data, at 8.4% by number and 5.7% by dollar. The bank's performance was significantly below the 22.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 24.6% by number and 18.4% by dollar, was above the aggregate lending data at 17.0% by number, above 13.1% by dollar, and above the moderate-income families in the assessment area at 17.3%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 32.7% of loans by number and 23.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 44.3% by number and 26.8% by dollar, in addition to being significantly below the 91.4% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 70.2% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 36.2% of loans by number and 18.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 39.8% by number and 23.7% by dollar, in addition to being significantly below the 91.4% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 66.4% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 55.0% of loans by number and 29.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly above the aggregate lending data, at 45.3% by number and 32.1% by dollar, in addition to being below the 90.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 66.9% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 72 loans for approximately \$310.6 million. The community development lending in this assessment area represented 7.9% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$155.3 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$167.1 million, this represented a slight decrease by dollar volume in performance. However, the bank's annualized number of loans increased to 36 community development loans, compared to the previous evaluation period of 17 community

development loans. Additionally, based on annualized community development loans to deposits, the bank ranked first out of five compared to similarly situated banks that primarily served this multistate assessment area.

The institution’s community development loans by year and purpose are summarized in the table below.

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>										
<b>Community Development Lending</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	2	5,452	7	67,933	1	250	37	89,171	47	162,806
2021	2	15,872	7	81,944	4	18,122	12	31,833	25	147,771
<b>Total</b>	<b>4</b>	<b>21,324</b>	<b>14</b>	<b>149,877</b>	<b>5</b>	<b>18,372</b>	<b>49</b>	<b>121,004</b>	<b>72</b>	<b>310,577</b>

Examples of community development lending which benefited the assessment area included the following:

- From 2020 to 2021, the bank made four loans totaling \$21.3 million to fund new construction or extension of multi-family buildings. These projects contained a percentage of units dedicated to LMI individuals. With these loans, the bank supported affordable housing.
- In 2020 and 2021, the bank originated 48 PPP loans in amounts greater than \$1 million, totaling approximately \$106.0 million cumulatively, to businesses in LMI census tracts, which helped to revitalize and stabilize these communities.

### **Innovative and/or Flexible Lending Practices**

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### **INVESTMENT TEST**

M&T’s performance is rated High Satisfactory in the investment test for this assessment area. The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited good responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 352 qualified investments and grants, totaling \$62.0 million in this assessment area, which included three new investments for \$12.7 million, 143 prior period investments with a current balance of \$44.6 million, and 352 grants for \$4.7 million. The community development activity in this assessment area represented 4.8% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis,

qualified investments and grants performance increased since prior evaluation, with \$31.0 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$24.7 million at the previous evaluation. Based on annualized investments and grants to deposits, the bank ranked 2<sup>nd</sup> out of five compared to similarly situated banks that primarily served this multistate assessment area. However, the performance was primarily driven by large dollar volume of prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	143	44,562	0	0	0	0	0	0	<b>143</b>	<b>44,562</b>
2020	1	9,523	0	0	0	0	1	680	<b>2</b>	<b>10,203</b>
2021	0	0	0	0	1	2,531	0	0	<b>1</b>	<b>2,531</b>
<b>Total Investments</b>	<b>144</b>	<b>54,085</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2,531</b>	<b>1</b>	<b>680</b>	<b>146</b>	<b>57,296</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>352</b>	<b>4,680</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>352</b>	<b>4,680</b>
<b>Grand Total</b>	<b>144</b>	<b>54,085</b>	<b>352</b>	<b>4,680</b>	<b>1</b>	<b>2,531</b>	<b>1</b>	<b>680</b>	<b>498</b>	<b>61,976</b>

Source: Bank Data from January 1, 2020 to December 31, 2021

The following is an example of a community development investment that benefited this assessment area:

- In 2020, the bank made an investment totaling \$9.5 million, in mortgage-backed securities that were used to build properties that qualified for LIHTCs. LIHTCs are a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With this investment, the bank supported affordable housing for LMI individuals.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited good responsiveness to assessment area credit and community development needs. Of the bank’s new qualified investments, 33.3% primarily promoted affordable housing efforts, and 33.3% provided economic development, which were community development needs within this assessment area. Qualified grants promoted community services towards LMI individuals within this assessment area.

### **Community Development Initiatives**

The bank occasionally made use of innovative and/or complex investments to support community development initiatives, as new investments were a mix of mortgage-backed securities, LIHTC, and Rehab Tax credits. The prior period investments also included mortgage-backed securities and LIHTC.

### **SERVICE TEST**

M&T’s performance is rated High Satisfactory in the service test for this assessment area. Delivery systems were accessible to essentially all portions of the assessment area. To the extent changes were made, the bank’s opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that

inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. The bank provided a relatively high level of community development services in this assessment area.

## **Retail Services**

### ***Accessibility of Delivery Systems***

Delivery systems were accessible to essentially all portions of the bank's assessment area. M&T operated 36 full-service branches in this assessment area, of which 10 branch offices (27.8%) were in LMI census tracts. The bank maintained a total of 91 ATMs comprised of 1 full-service ATM at each branch (except for 11 branches that had 2 full-service ATMs each), 1 location that had 3 full-service ATMs, and 42 stand-alone ATMs located in gas stations, malls, and schools. Of the ATMs, 31 (34.1%) were located in LMI census tracts. The bank's percentage of branches and ATMs were similar to the percentage of LMI census tracts in this MSA (30.5%) and the percentage of the population residing in LMI census tracts (29.2%). Additionally, 18 of the bank's branches were also adjacent to LMI census tracts, improving accessibility.

### ***Changes in Branch Locations***

To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Although there were no relocations, the bank closed 13 branches during the evaluation period in this assessment area. Of the closed branches, two were in LMI census tracts; however, four additional closed branches were adjacent to LMI census tracts. Thus, these branch closures negatively affected the accessibility of the bank's delivery systems in LMI geographies.

### ***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. All of the branches in LMI census tracts offered extended hours; 21 (58.3%) of the branches, including 6 (60.0%) in LMI tracts, offered weekend hours and 22 (61.2%) branches, including 5 (50.0%) in LMI tracts, offered drive-thru hours.

The bank's products and services in this assessment area were consistent with those discussed at the institution level.

## **Community Development Services**

M&T provided a relatively high level of community development services in this assessment area. The bank conducted 94 services during the evaluation period that primarily targeted community services. This activity accounted for 5.9% of the bank's total number of community development services activity. On an annualized basis over 24 months, this represented a decrease as the bank conducted 47 community development services, compared to the previous evaluation's annualized performance of 189.1 community development services. However, this decrease can be attributed to the restrictions imposed due to COVID-19. Additionally, the bank had 767 community development service hours during the evaluation period, which on an annualized basis was 383.5 hours.

The bank's community development services by year and purpose are summarized in the table below:

<b>MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)</b>					
<b>Community Development Services</b>					
<b>January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	2	36	9	0	<b>47</b>
2021	7	34	6	0	<b>47</b>
<b>Total</b>	<b>9</b>	<b>70</b>	<b>15</b>	<b>0</b>	<b>94</b>

The following are examples of community development services that benefited this assessment area:

- In 2020 and 2021, thirty-seven bank employees served on the boards of organizations dedicated to providing various services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and emergency services to LMI populations within the assessment area.
- In 2020 and 2021, two bank employees served on the boards of nonprofit organizations that promoted affordable housing services, including home lending education, financially literacy services, and home counseling services to disadvantaged LMI individuals.



## MULTISTATE METROPOLITAN AREA

### CRA RATING FOR MSA 41540 (Salisbury, MD-DE): SATISFACTORY

*The Lending Test is rated: Low Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: Low Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected excellent responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- Made a low level in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

#### INVESTMENT TEST

- Made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Rarely used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were reasonably accessible to essentially all portions of the assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

## SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank's performance in this multistate assessment area as detailed in Appendix A.

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 20 of its 664 locations and 60 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 24 institutions operated 139 offices within this assessment area. M&T ranked 3<sup>rd</sup> with approximately \$1.8 billion in deposits, which represented 2.0% of the deposit market share and accounted for 1.4% of the bank's total branch deposits. This assessment area generated approximately 2.3% by number and 2.1% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions such as Discover Bank and PNC Bank.

## PERFORMANCE CONTEXT

### *Demographic Characteristics*

The MSA 41540 (Salisbury, MD-DE) assessment area included Sussex County, Wicomico County, and Worcester County. According to the 2015 ACS, the population of this assessment area was 360,003. The assessment area consisted of 90 census tracts, of which none were low-income, 11 or 12.2% were moderate-income, 51 or 56.7% were middle-income, 25 or 27.8% were upper-income, and 3 or 3.3% were of unknown-income.

### *Income Characteristics*

Based on the 2015 ACS, the MSA 41540 (Salisbury, MD-DE) assessment area had 93,212 families, of which 20.3% were low-income (9.3% of which were below the poverty level), 17.8% were moderate-income, 20.8% were middle-income, and 41.0% were upper-income.

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

<b>MSA 41540 (Salisbury, MD-DE) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$69,557	\$76,792	10.4%
Sussex County, DE	\$69,172	\$77,499	12.0%
Wicomico County, MD	\$69,085	\$71,467	3.5%
Worcester County, MD	\$74,905	\$85,157	13.7%
MSA 41540 (Salisbury, MD-DE)	\$68,932	\$76,095	10.4%
State of Delaware	\$79,750	\$84,825	6.4%
State of Maryland	\$98,429	\$105,790	7.5%

*Source: 2011 – 2015 U.S. Census Bureau American Community Survey.  
2016 – 2020 U.S. Census Bureau American Community Survey.  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

### ***Housing Characteristics***

Based on the 2015 ACS data, the MSA 41540 (Salisbury, MD-DE) assessment area had 225,114 housing units, of which 45.2% were owner-occupied, 16.6% were rental, and 38.3% were vacant. Of the total housing units, none were located in low-income census tracts, 9.3% in moderate-income census tracts, 57.2% in middle-income census tracts, and 33.4% in upper-income census tracts. In moderate-income census tracts, 37.2% of housing units were owner-occupied, 47.9% were rental units, and 14.9% were vacant.

The median age of housing stock in this assessment area was 34 years old, with 9.0% of the stock built before 1950. The median age of housing stock was 44 years in moderate-income tracts. According to the 2015 ACS, the median housing value in this assessment area was \$214,855 with an affordability ratio of 25.1. The median gross rent in the assessment area was \$981 per month.

<b>MSA 41540 (Salisbury, MD-DE) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$214,855	25.1	\$981
Sussex County, DE	\$228,500	23.5	\$974
Wicomico County, MD	\$172,400	30.3	\$994
Worcester County, MD	\$243,100	23.4	\$963
MSA 41540 (Salisbury, MD-DE)	\$210,880	25.1	\$965
State of Delaware	\$231,500	26.1	\$1,018
State of Maryland	\$286,900	26.0	\$1,230

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

### ***Housing Cost Burden***

According to HUD’s 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 45.3% of all rental households had rental costs that exceeded 30% of their incomes, 76.1% of low-income rental households had rental costs that exceeded 30% of their income, and 42.8% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD’s data, within this assessment area, 22.7% of homeowners had housing costs that exceeded 30% of their incomes, 63.9% of low-income homeowners had housing costs that exceeded 30% of their income, and 35.6% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the “Housing Cost Burden” table below for more details.

<b>MSA 41540 (Salisbury, MD-DE) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>

Assessment Area	76.1%	42.8%	45.3%	63.9%	35.6%	22.7%
Sussex County, DE	73.9%	37.5%	42.6%	63.1%	33.5%	22.6%
Wicomico County, MD	77.3%	52.2%	48.1%	62.5%	35.6%	18.5%
Worcester County, MD	79.7%	36.8%	45.8%	68.9%	44.9%	28.4%
MSA 41540 (Salisbury, MD-DE)	76.3%	41.5%	46.2%	63.9%	35.4%	23.0%
State of Delaware	75.8%	42.8%	43.4%	64.0%	35.2%	21.2%
State of Maryland	77.2%	44.4%	45.2%	66.6%	39.4%	22.1%

*\*Cost Burden is housing cost that equals 30% or more of household income.  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.*

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 19,550 businesses operating in this assessment area in 2021, of which none were located in low-income census tracts and 10.0% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 92.9% were small businesses with a GAR of \$1 million or less, of which 9.8% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.4% in 2019, increased to 7.9% in 2020, and decreased to 5.6% in 2021. The state of Maryland had an unemployment rate of 3.4% in 2019, increased to 6.7% in 2020, and decreased to 5.8% in 2021.

<b>MSA 41540 (Salisbury, MD-DE) Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.4%	7.9%	5.6%
Sussex County, DE	3.7%	7.2%	4.8%
Wicomico County, MD	4.5%	7.6%	6.1%
Worcester County, MD	7.2%	11.6%	8.2%
MSA 41540 (Salisbury, MD-DE)	4.5%	7.9%	5.7%
State of Delaware	3.7%	7.6%	5.3%
State of Maryland	3.4%	6.7%	5.8%

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

Additional performance context data for this assessment area is provided in the following MSA 41540 (Salisbury, MD-DE) Assessment Area Demographics Table:

<b>MSA 41540 (Salisbury, MD-DE) Assessment Area Demographics</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	0	0.0	0	0.0	0	0.0	18,937	20.3
Moderate-income	11	12.2	11,335	12.2	2,230	19.7	16,607	17.8
Middle-income	51	56.7	59,052	63.4	5,240	8.9	19,407	20.8
Upper-income	25	27.8	22,825	24.5	1,155	5.1	38,261	41.0

Unknown-income	3	3.3	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>90</b>	<b>100.0</b>	<b>93,212</b>	<b>100.0</b>	<b>8,625</b>	<b>9.3</b>	<b>93,212</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		<b>#</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	21,022	7,828	7.7	37.2	10,065	47.9	3,129	14.9
Middle-income	128,877	66,920	65.8	51.9	20,968	16.3	40,989	31.8
Upper-income	75,215	26,935	26.5	35.8	6,229	8.3	42,051	55.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>225,114</b>	<b>101,683</b>	<b>100.0</b>	<b>45.2</b>	<b>37,262</b>	<b>16.6</b>	<b>86,169</b>	<b>38.3</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,964	10.0	1,779	9.8	159	13.4	26	13.2
Middle-income	12,522	64.1	11,616	64.0	783	65.9	123	62.4
Upper-income	5,064	25.9	4,769	26.3	247	20.8	48	24.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>19,550</b>	<b>100.0</b>	<b>18,164</b>	<b>100.0</b>	<b>1,189</b>	<b>100.0</b>	<b>197</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>92.9</b>		<b>6.1</b>		<b>1.0</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	36	5.9	34	5.7	2	15.4	0	0.0
Middle-income	459	75.0	446	74.8	10	76.9	3	100.0
Upper-income	117	19.1	116	19.5	1	7.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>612</b>	<b>100.0</b>	<b>596</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.4</b>		<b>2.1</b>		<b>.5</b>
	<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.</i>							

## Community Contact

Examiners conducted community contact interviews with two community organizations that served this assessment area. The first community contact interview was with an organization that served LMI students and was dedicated to closing the achievement gap experienced by children who are economically disadvantaged in Wicomico and Worcester Counties. According to the contact, the economy was improving and slowly returning to pre-pandemic levels. However, the contact explained that there were a number of under-banked families and as a result, the organization had been increasing their focus to financial literacy classes for parents. The organization also communicated that it has a very small staff and relatively small

budget, noting that it would be helpful if financial institutions simplified the application process for grants and donations.

A second community contact interview was conducted with an organization that focused on affordable housing. The contact explained that during the pandemic, landlords were raising rents as soon as leases expired contributing to unaffordability in housing. Additionally, the area saw an increase in competition for homes driven by retirees and new landlords from other counties or states. The organization would like to see more grants, donations, low-interest loans, and low-closing cost products from banks for accessing housing. Additionally, the organization would like to see banks work on reducing barriers by offering bilingual products/services and better hours of operation for LMI people that may not have access to a computer or the internet.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 41540 (SALISBURY, MD-DE)**

### **LENDING TEST**

M&T's performance is rated Low Satisfactory in the lending test for this assessment area. The bank's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of this assessment area to low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank made a low level of community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### **Lending Activity**

M&T's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. This assessment area was competitive for financial services, with competitors including large financial institutions. M&T maintained a market share of deposits in the top three, while its lending market share in this assessment area was also strong throughout the evaluation period.

In 2021, the bank ranked 3<sup>rd</sup> out of 24 institutions with a deposit market share of 2.0%. In total HMDA lending, the bank ranked 16<sup>th</sup> out of 551 reporters with a market share of 1.6%, including market shares of 0.7% in home purchase lending, 1.5% in refinance, 20.3% in home improvement, and 15.6% in multifamily loans. M&T ranked 3<sup>rd</sup> out of 117 reporters with a market share of 6.6% in small business lending.

In 2020, the bank ranked 3<sup>rd</sup> out of 25 institutions with a deposit market share of 1.7%. In total HMDA lending, the bank ranked 10<sup>th</sup> out of 526 reporters with a market share of 2.1%, including market shares of 1.3% in home purchase lending, 1.7% in refinance, 23.0% in home improvement, and 8.1% in multifamily loans. M&T ranked 2<sup>nd</sup> out of 128 reporters with a market share of 9.2% in small business lending.

In 2019, the bank ranked 3<sup>rd</sup> out of 25 institutions with a deposit market share of 1.6%. In total HMDA lending, the bank ranked 7<sup>th</sup> out of 468 reporters with a market share of 2.5%, including market shares of 1.4% in home purchase lending, 3.2% in refinance, and 15.0% in home improvement. M&T ranked 8<sup>th</sup> out of 88 reporters with a market share of 4.6% in small business lending.

M&T's lending in this assessment area is summarized in the following table:

<b>MSA 41540 (Salisbury, MD-DE) Summary of Lending Activity January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	475	27.9%	39,600	8.2%
Home Purchase	473	27.8%	138,110	28.7%
Loan Purpose Not Applicable	35	2.1%	5,925	1.2%
Multi-Family	15	0.9%	125,102	26.0%
Refinancing	705	41.4%	171,787	35.7%
<b>Total HMDA</b>	<b>1,703</b>	<b>44.6 %</b>	<b>480,524</b>	<b>71.7%</b>
<b>Total Small Business</b>	<b>2,106</b>	<b>55.1%</b>	<b>187,598</b>	<b>28.0%</b>
<b>Total Small Farm</b>	<b>13</b>	<b>0.3%</b>	<b>2,151</b>	<b>0.3%</b>
<b>TOTAL LOAN</b>	<b>3,822</b>	<b>100.0%</b>	<b>670,273</b>	<b>100.0%</b>

### Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 41540 (Salisbury, MD-DE) assessment area. Since there were no low-income census tracts in this assessment area, the rating was based entirely on moderate-income tract performance. Lending penetration in moderate-income tracts was good for home purchase, good for refinance, good for home improvement, adequate for multifamily, and good for small business.

### Gap Analysis

M&T demonstrated an excellent level of dispersion in moderate-income census tracts in this assessment area. This assessment area did not contain any low-income census tracts. In 2019, the bank's performance was at 81.8% and increased to 100.0% in 2020 and 2021. Overall, performance improved when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 41540 (Salisbury, MD-DE) Lending Gap Analysis January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	0	0	
Moderate	11	2	81.8%
Middle	51	0	100.0%
Upper	25	2	92.0%
Income Unknown	3	3	0.0%
<b>2020</b>			
Low	0	0	
Moderate	11	0	100.0%
Middle	51	0	100.0%
Upper	25	0	100.0%
Income Unknown	3	3	0.0%
<b>2021</b>			
Low	0	0	

Moderate	11	0	100.0%
Middle	51	0	100.0%
Upper	25	0	100.0%
Income Unknown	3	3	0.0%

### ***Home Lending Loans***

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area.

In 2021, the bank made 9.2% of home purchase loans by number and 6.2% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly above the 7.7% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 5.8% by number and 3.6% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 6.9% of home purchase loans by number and 4.0% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly below the 7.7% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 4.5% by number and 2.7% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 4.8% of home purchase loans by number and 3.3% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the 7.7% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 4.7% by number and 2.8% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 6.6% by number and 6.4% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 7.7% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 3.4% by number and 2.3% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 3.1% by number and 1.8% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 7.7% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 2.9% by number and 1.9% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 1.6% by number and 0.9% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 7.7% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 3.9% by number and 2.3% by dollar of refinance loans in moderate-income census tracts.



### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area.

In 2021, the bank made 2.9% by number and 1.4% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 7.7% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 3.6% by number and 1.9% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 6.3% by number and 5.3% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was slightly below the 7.7% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 5.5% by number and 3.4% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 4.0% by number and 3.5% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 7.7% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 3.6% by number and 2.8% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected adequate penetration throughout the assessment area based on the bank's performance in moderate-income census tracts, as there were no low-income census tracts.

In 2021, the bank made 40.0% by number and 5.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 11.0% of multifamily housing units located in moderate-income census tracts and significantly above the aggregate, which made 25.0% by number and 19.7% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank did not make any multifamily loans in moderate-income census tracts.

In 2019, the bank made 60.0% by number and 65.2% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 11.0% of multifamily housing units located in moderate-income census tracts and significantly above the aggregate, which made 31.4% by number and 22.5% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 8.1% by number and 9.9% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly

below the 10.0% of businesses located in moderate-income census tracts and similar to the aggregate, which made 8.0% by number and 8.9% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 9.7% by number and 8.8% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 10.0% of businesses located in moderate-income census tracts and similar to the aggregate, which made 9.3% by number and 10.8% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 7.0% by number and 9.2% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was below the 10.3% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 8.9% by number and 9.3% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 6.7% by number and 3.1% by dollar to low-income borrowers and was significantly below the 20.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 4.0% by number and 1.9% by dollar to low-income families. The bank's lending to moderate-income borrowers was 13.3% by number and 7.0% by dollar, which was similar to the aggregate performance of 12.4% by number, slightly below 8.0% by dollar, and below the 17.8% moderate-income families in the assessment area.

In 2020, the bank made 5.9% by number and 2.6% by dollar to low-income borrowers and was significantly below the 20.3% of low-income families in the assessment area. Performance was slightly above aggregate lending, which made 4.7% by number and 2.4% by dollar to low-income families. The bank's lending to moderate-income borrowers was 16.0% by number and 9.5% by dollar, which was slightly above the aggregate performance of 13.7% by number, similar to 9.2% by dollar, and slightly below the 17.8% moderate-income families in the assessment area.

In 2019, the bank made 4.2% by number and 2.3% by dollar to low-income borrowers and was significantly below the 20.3% of low-income families in the assessment area. Performance was similar to aggregate lending, which made 4.1% by number and 2.0% by dollar to low-income families. The bank's lending to moderate-income borrowers was 12.7% by number and 7.7% by dollar, which was similar to the aggregate performance of 14.0% by number, slightly below 9.3% by dollar, and below the 17.8% moderate-income families in the assessment area.

#### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 7.4% by number and 2.8% by dollar and was significantly above the aggregate lending data, at 3.9% by number and 2.0% by dollar. The bank's performance was significantly below the 20.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.9% by number and 12.4% by dollar, was significantly above the aggregate lending data at 12.1% by number, significantly above 8.0% by dollar, and slightly above the 17.8% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 7.0% by number and 2.6% by dollar and was significantly above the aggregate lending data, at 2.8% by number and 1.5% by dollar. The bank's performance was significantly below the 20.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.2% by number and 8.7% by dollar, was significantly above the aggregate lending data at 10.7% by number, slightly above 7.3% by dollar, and similar to the 17.8% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 5.7% by number and 2.2% by dollar and was similar to the aggregate lending data, at 5.3% by number and 2.3% by dollar. The bank's performance was significantly below the 20.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 18.7% by number and 9.6% by dollar, was significantly above the aggregate lending data at 11.5% by number, above 6.9% by dollar, and similar to the 17.8% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 7.5% by number and 4.6% by dollar and was above the aggregate lending data, at 5.6% by number and 3.5% by dollar. The bank's performance was significantly below the 20.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 21.3% by number and 18.6% by dollar, was above the aggregate lending data at 14.4% by number, significantly above 9.9% by dollar, and slightly above the moderate-income families in the assessment area at 17.8%.

In 2020, the bank's lending to low-income borrowers was 9.1% by number and 5.2% by dollar and was significantly above the aggregate lending data, at 5.9% by number and 3.5% by dollar. The bank's performance was significantly below the 20.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.4% by number and 18.4% by dollar, was slightly above the aggregate lending data at 15.8% by number, significantly above 11.6% by dollar, and similar to the moderate-income families in the assessment area at 17.8%.

In 2019, the bank's lending to low-income borrowers was 12.7% by number and 6.9% by dollar and was significantly above the aggregate lending data, at 7.6% by number and 4.4% by dollar. The bank's performance was below the 20.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 11.9% by number and 8.0% by dollar, was below the aggregate lending data at 16.2% by number, below 12.8% by dollar, and below the moderate-income families in the assessment area at 17.8%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 41.2% of loans by number and 28.0% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 44.3% by number and 29.6% by dollar, in addition to being significantly below the 92.9% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 80.5% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 47.8% of loans by number and 24.9% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 34.7% by number and 26.4% by dollar, in addition to being below the 92.9% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 77.4% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 72.8% of loans by number and 44.8% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly above the aggregate lending data, at 46.1% by number and 42.9% by dollar, in addition to being slightly below the 92.5% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 83.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T made a low-level of community development loans in this assessment area. During the evaluation period, the bank made one community development loan for approximately \$1.1 million. The community development lending in this assessment area represented 0.03% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$538,000. Compared to the previous evaluation where the bank had an annualized performance totaling \$3.0 million, this represented a significant decrease. Additionally, based on annualized community development loans to deposits, the bank ranked 4<sup>th</sup> out of five compared to similarly situated banks that primarily served this multistate assessment area.

M&T's one community development loan in this assessment area was an SBA 504 loan made in 2021. This financing program offered by SBA promotes business growth and job creation through the purchase or improvement of real estate, equipment, and other fixed assets. With this loan, the bank promoted economic development.

### Innovative and/or Flexible Lending Practices

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### INVESTMENT TEST

M&T’s performance is rated Low Satisfactory in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank rarely used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank reported 58 qualified investments and grants totaling \$8.3 million in this assessment area, consisting of 11 prior period investments with a current balance of \$7.9 million, and 47 grants totaling \$327,000. The bank did not have new qualified investments. The community development activity in this assessment area represented 0.6% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance increased since prior evaluation, with \$4.1 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$2.9 million at the previous evaluation. However, this performance was driven by the volume of prior period investments. Based on annualized investments and grants to deposits, the bank ranked 3<sup>rd</sup> out of five compared to similarly situated banks that primarily served this multistate assessment area.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

MSA 41540 (Salisbury, MD-DE) Qualified Investments and Grants January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	10	6,274	0	0	1	1,663	0	0	11	7,937
<b>Total Investments</b>	<b>10</b>	<b>6,274</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1,663</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>7,937</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>47</b>	<b>327</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>47</b>	<b>327</b>
<b>Grand Total</b>	<b>10</b>	<b>6,274</b>	<b>47</b>	<b>327</b>	<b>1</b>	<b>1,663</b>	<b>0</b>	<b>0</b>	<b>58</b>	<b>8,264</b>

The following is an example of community development investments that benefited this assessment area:

- All of the bank’s \$7.9 million in prior period investments were in mortgage-backed securities comprised of mortgages made to LMI borrowers.

## **Responsiveness to Credit and Community Development Needs**

M&T exhibited adequate responsiveness to assessment area credit and community development needs. As mentioned above, the bank did not make any new qualified investments; however, prior period investments primarily promoted affordable housing efforts, which was a community development need within this assessment area. Qualified grants promoted community services towards LMI individuals, which was also an identified community development need within this assessment area.

## **Community Development Initiatives**

The bank rarely made use of innovative and/or complex investments to support community development initiatives. M&T did not make any new qualified investments and all of the prior period investments were comprised of mostly mortgage-backed securities, which are not particularly innovative or complex.

## **SERVICE TEST**

M&T's performance is rated Low Satisfactory in the service test for this assessment area. Delivery systems were reasonably accessible to essentially all portions of the assessment area. To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. The bank provided an adequate level of community development services in this assessment area.

## **Retail Services**

### ***Accessibility of Delivery Systems***

Delivery systems were reasonably accessible to essentially all portions of the bank's assessment area. M&T operated 20 full-service branches in this assessment area, of which 2 branch offices (10.0%) were in LMI census tracts. The bank maintained a total of 60 ATMs, 1 full-service ATM at 5 branches, 2 full-service ATMs in 11 branches, 3 full-service ATMs in 1 branch, and 30 standalone ATMs. Of the ATMs, eight (13.3%) were located in LMI census tracts. Although the bank's branches and ATM percentage were slightly below the percentage of LMI census tracts in this MSA (12.2%) and the percentage of the population residing in LMI census tracts (14.5%), 11 of the branches were also adjacent to LMI census tracts.

### ***Changes in Branch Locations***

To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Although there were no relocations, the bank closed two branches during the evaluation period in this assessment area. Both closed branches were in middle-income census tracts; however, both branches were adjacent to LMI census tracts. Thus, these branch closures negatively affected the accessibility of the bank's delivery systems in LMI geographies.

### ***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. Hours varied depending on business need, where 17 (85.0%) of the branches offered extended hours and drive-thru hours, including all of the branches located in LMI census tracts.

The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### Community Development Services

M&T provided an adequate level of community development services in this assessment area. The bank conducted 14 services during the evaluation period that primarily addressed community services. This activity accounted for 0.9% of the bank’s total number of community development services activity. On an annualized basis over 24 months, this represented a decrease as the bank made 7 community development services, compared to the previous year’s annualized performance of 36.6 community development services. However, this decrease can be attributed to the restrictions imposed due to COVID-19. Additionally, the bank had 379 community development service hours during the evaluation period, which on an annualized basis was 189.5 hours.

The bank’s community development services by year and purpose are summarized in the table below.

MSA 41540 (Salisbury, MD-DE) Community Development Services January 1, 2020 to December 31, 2021					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020	0	6	1	0	7
2021	1	6	0	0	7
<b>Total</b>	<b>1</b>	<b>12</b>	<b>1</b>	<b>0</b>	<b>14</b>

The following are examples of community development services that benefited this assessment area:

- Seven bank employees served on the boards of organizations dedicated to providing various services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and emergency services to LMI populations within the assessment area.
- In 2021, an officer served on the board of a non-profit organization dedicated to providing affordable housing to low-income individuals.

## MULTISTATE METROPOLITAN AREA

### CRA RATING FOR MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV): **OUTSTANDING**

*The Lending Test is rated: **Outstanding***

*The Investment Test is rated: **High Satisfactory***

*The Service Test is rated: **High Satisfactory***

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected excellent responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected excellent penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an excellent record of serving the credit needs of low-income individuals and areas and very small businesses.
- Leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

#### INVESTMENT TEST

- Made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors.
- Exhibited good responsiveness to credit and community development needs.
- Occasionally used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were readily accessible to all portions of the assessment area.
- Record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.



## SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this multistate assessment area as detailed in Appendix A.

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 70 of its 664 locations and 158 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 67 institutions operated 1,321 offices within this assessment area. M&T ranked 13<sup>th</sup> with approximately \$6.6 billion in deposits, which represented 1.9% of the deposit market share and accounted for 5.1% of the bank’s total branch deposits. This assessment area generated approximately 9.7% by number and 11.5% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions, such as Bank of America, Capital One, Truist Bank, and Wells Fargo.

## PERFORMANCE CONTEXT

### *Demographic Characteristics*

The MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area included District of Columbia, Calvert County, Charles County, Frederick County, Montgomery County, Prince George’s County, Arlington County, Fairfax County, Loudoun County, Prince William County, Spotsylvania County, Alexandria city, Fairfax city, Falls Church city, Fredericksburg city, Manassas city, and Manassas Park city. According to the 2015 ACS, the population of this assessment area was 5,580,946. The assessment area consisted of 1,279 census tracts, of which 127 or 9.9% were low-income, 276 or 21.6% were moderate-income, 434 or 33.9% were middle-income, 424 or 33.2% were upper-income, and 18 or 1.4% were of unknown-income.

### *Income Characteristics*

Based on the 2015 ACS, the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area had 1,312,673 families, of which 21.9% were low-income (5.8% of which were below the poverty level), 16.6% were moderate-income, 20.1% were middle-income, and 41.5% were upper-income.

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

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$113,574	\$128,037	12.7%
District of Columbia, DC	\$93,220	\$120,337	29.1%
Calvert County, MD	\$119,406	\$125,476	5.1%
Charles County, MD	\$111,987	\$114,535	2.3%
Frederick County, MD	\$107,142	\$115,536	7.8%
Montgomery County, MD	\$128,703	\$133,556	3.8%

Prince George's County, MD	\$93,355	\$101,564	8.8%
Arlington County, VA	\$153,876	\$165,016	7.2%
Fairfax County, VA	\$141,822	\$149,576	5.5%
Loudoun County, VA	\$150,266	\$164,579	9.5%
Prince William County, VA	\$117,238	\$118,829	1.4%
Spotsylvania County, VA	\$95,676	\$101,766	6.4%
Alexandria City, VA	\$119,173	\$137,135	15.1%
Fairfax City, VA	\$136,077	\$147,236	8.2%
Falls Church City, VA	\$180,745	\$182,567	1.0%
Fredericksburg City, VA	\$68,134	\$94,833	39.2%
Manassas City, VA	\$85,553	\$96,157	12.4%
Manassas Park City, VA	\$85,414	\$79,375	-7.1%
MD 23224 (Frederick-Gaithersburg-Rockville, MD)	\$123,084	\$129,092	4.9%
MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	\$115,928	\$126,224	8.9%
District of Columbia	\$93,220	\$120,337	29.1%
State of Maryland	\$98,429	\$105,790	7.5%
Commonwealth of Virginia	\$85,647	\$93,284	8.9%

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

2016 - 2020 U.S. Census Bureau American Community Survey.

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

### Housing Characteristics

Based on the 2015 ACS data, the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area had 2,145,589 housing units, of which 58.5% were owner-occupied, 35.1% were rental, and 6.4% were vacant. Of the total housing units, 9.6% were located in low-income census tracts, 21.0% in moderate-income census tracts, 34.9% in middle-income census tracts, 34.1% in upper-income census tracts, and 0.4% in unknown-income census tracts. In low-income census tracts, 23.4% of housing units were owner-occupied, 66.5% were rental units, and 10.1% were vacant. In moderate-income census tracts, 47.4% of housing units were owner-occupied, 45.3% were rental units, and 7.2% were vacant.

The median age of housing stock in this assessment area was 43 years old, with 14.3% of the stock built before 1950. The median age of housing stock was 56 years in low-income tracts and 46 years in moderate-income tracts. According to the 2015 ACS, the median housing value in this assessment area was \$387,782 with an affordability ratio of 23.8. The median gross rent in the assessment area was \$1,514 per month.

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)</b>			
<b>Housing Characteristics</b>			
<b>Geographic Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$387,782	23.8	\$1,514
District of Columbia, DC	\$475,800	14.9	\$1,327
Calvert County, MD	\$341,800	28.0	\$1,557
Charles County, MD	\$284,500	31.9	\$1,487

Frederick County, MD	\$300,100	27.9	\$1,285
Montgomery County, MD	\$454,700	21.9	\$1,627
Prince Georg's County, MD	\$254,700	29.2	\$1,294
Arlington County, VA	\$607,700	17.4	\$1,827
Fairfax County, VA	\$501,200	22.5	\$1,747
Loudoun County, VA	\$452,300	27.3	\$1,668
Prince William County, VA	\$333,100	29.6	\$1,547
Spotsylvania County, VA	\$248,300	31.5	\$1,346
Alexandria City, VA	\$502,500	17.7	\$1,555
Fairfax City, VA	\$470,300	22.4	\$1,692
Falls Church City, VA	\$718,900	16.8	\$1,517
Fredericksburg City, VA	\$317,900	16.3	\$1,058
Manassas City, VA	\$276,700	26.3	\$1,327
Manassas Park City, VA	\$248,300	29.6	\$1,470
MD 23224 (Frederick-Gaithersburg-Rockville, MD)	\$410,073	23.4	\$1,568
MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	\$369,373	24.5	\$1,482
District of Columbia	\$475,800	14.9	\$1,327
State of Maryland	\$286,900	26.0	\$1,230
Commonwealth of Virginia	\$245,000	26.5	\$1,116

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

### ***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 43.2% of all rental households had rental costs that exceeded 30% of their incomes, 78.7% of low-income rental households had rental costs that exceeded 30% of their income, and 55.4% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 21.8% of homeowners had housing costs that exceeded 30% of their incomes, 70.2% of low-income homeowners had housing costs that exceeded 30% of their income, and 49.3% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)</b>						
<b>Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	78.7%	55.4%	43.2%	70.2%	49.3%	21.8%
District of Columbia, DC	68.2%	48.6%	41.5%	66.1%	42.7%	21.5%
Calvert County, MD	73.4%	26.8%	44.3%	62.3%	47.7%	19.0%
Charles County, MD	73.2%	62.2%	45.4%	68.1%	57.8%	24.1%

Frederick County, MD	76.0%	36.5%	43.8%	59.7%	41.3%	19.5%
Montgomery County, MD	83.7%	61.0%	46.6%	72.6%	49.4%	21.8%
Prince George's County, MD	82.3%	45.7%	47.4%	74.3%	52.4%	27.2%
Arlington County, VA	78.8%	69.1%	34.8%	74.0%	53.7%	17.8%
Fairfax County, VA	83.3%	69.6%	42.0%	72.1%	53.6%	20.6%
Loudoun County, VA	81.1%	71.0%	41.1%	72.1%	50.7%	18.0%
Prince William County, VA	85.1%	58.5%	47.0%	71.1%	49.6%	22.3%
Spotsylvania County, VA	76.4%	37.7%	44.3%	59.0%	34.3%	20.3%
Alexandria City, VA	83.7%	54.3%	38.9%	70.8%	49.3%	19.8%
Fairfax City, VA	77.6%	51.6%	39.8%	65.4%	36.5%	19.6%
Falls Church City, VA	89.0%	82.5%	38.1%	84.8%	73.3%	27.9%
Fredericksburg City, VA	81.0%	29.9%	46.9%	62.8%	28.2%	16.8%
Manassas city, VA	83.1%	48.4%	53.7%	68.5%	51.7%	27.1%
Manassas Park City, VA	94.5%	52.7%	49.0%	77.7%	30.9%	30.9%
MD 23224 (Frederick-Gaithersburg-Rockville, MD)	82.3%	56.0%	46.1%	69.2%	47.3%	21.3%
MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	77.5%	53.2%	42.4%	69.4%	47.3%	21.6%
District of Columbia	68.2%	48.6%	41.5%	66.1%	42.7%	21.5%
State of Maryland	77.2%	44.4%	45.2%	66.6%	39.4%	22.1%
Commonwealth of Virginia	76.7%	45.4%	42.5%	61.0%	34.9%	19.9%
*Cost Burden is housing cost that equals 30% or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.						

### ***Labor, Employment and Economic Characteristics***

According to D&B data, there were 327,646 businesses operating in this assessment area in 2021, of which 5.5% were located in low-income census tracts and 18.6% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.7% were small businesses with a GAR of \$1 million or less, of which 5.6% were located in low-income census tracts and 18.5% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.1% in 2019, increased to 6.5% in 2020, and decreased to 5.0% in 2021. The Commonwealth of Virginia had an unemployment rate of 2.8% in 2019, increased to 6.2% in 2020, and decreased to 3.9% in 2021.

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.1%	6.5%	5.0%
District of Columbia, DC	5.4%	8.0%	6.6%
Calvert County, MD	3.0%	5.2%	4.6%
Charles County, MD	3.5%	6.6%	5.7%
Frederick County, MD	3.0%	5.8%	4.8%
Montgomery County, MD	2.8%	6.2%	5.5%

Prince George’s County, MD	3.6%	8.0%	7.5%
Arlington County, VA	1.9%	4.4%	3.0%
Fairfax County, VA	2.3%	5.8%	3.5%
Loudoun County, VA	2.3%	5.3%	3.1%
Prince William County, VA	2.5%	6.5%	4.0%
Spotsylvania County, VA	2.9%	5.9%	3.8%
Alexandria City, VA	2.1%	6.0%	3.8%
Fairfax City, VA	2.1%	5.8%	3.4%
Falls Church City, VA	2.1%	3.8%	2.6%
Fredericksburg City, VA	3.3%	7.1%	4.7%
Manassas City, VA	2.5%	6.5%	3.9%
Manassas Park City, VA	2.5%	6.6%	3.8%
MD 23224 (Frederick-Gaithersburg-Rockville, MD)	2.9%	6.1%	5.4%
MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	3.1%	6.5%	4.8%
District of Columbia	5.4%	8.0%	6.6%
State of Maryland	3.4%	6.7%	5.8%
Commonwealth of Virginia	2.8%	6.2%	3.9%

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

Additional performance context data for this assessment area is provided in the following MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) Assessment Area Demographics Table:

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) Assessment Area Demographics</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	127	9.9	109,110	8.3	22,990	21.1	287,511	21.9
Moderate-income	276	21.6	263,350	20.1	22,658	8.6	217,363	16.6
Middle-income	434	33.9	460,437	35.1	20,190	4.4	263,545	20.1
Upper-income	424	33.2	476,812	36.3	9,519	2.0	544,254	41.5
Unknown-income	18	1.4	2,964	0.2	496	16.7	0	0.0
<b>Total Assessment Area</b>	<b>1,279</b>	<b>100.0</b>	<b>1,312,673</b>	<b>100.0</b>	<b>75,853</b>	<b>5.8</b>	<b>1,312,673</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
	#	%	%	#	%	#	%	
Low-income	205,635	48,090	3.8	23.4	136,838	66.5	20,707	10.1
Moderate-income	450,067	213,458	17.0	47.4	204,011	45.3	32,598	7.2
Middle-income	749,668	472,753	37.7	63.1	232,861	31.1	44,054	5.9
Upper-income	730,730	519,128	41.4	71.0	172,774	23.6	38,828	5.3
Unknown-income	9,489	1,874	0.1	19.7	6,861	72.3	754	7.9

<b>Total Assessment Area</b>	<b>2,145,589</b>	<b>1,255,303</b>	<b>100.0</b>	<b>58.5</b>	<b>753,345</b>	<b>35.1</b>	<b>136,941</b>	<b>6.4</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	17,923	5.5	16,728	5.6	1,069	4.4	126	4.6
Moderate-income	60,805	18.6	55,478	18.5	4,887	20.0	440	16.1
Middle-income	112,770	34.4	103,532	34.4	8,401	34.5	837	30.7
Upper-income	134,294	41.0	123,319	41.0	9,834	40.3	1,141	41.8
Unknown-income	1,854	0.6	1,476	0.5	195	0.8	183	6.7
<b>Total Assessment Area</b>	<b>327,646</b>	<b>100.0</b>	<b>300,533</b>	<b>100.0</b>	<b>24,386</b>	<b>100.0</b>	<b>2,727</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.7</b>		<b>7.4</b>		<b>.8</b>
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	46	2.4	46	2.4	0	0.0	0	0.0
Moderate-income	293	15.1	287	15.0	6	19.4	0	0.0
Middle-income	761	39.2	749	39.2	12	38.7	0	0.0
Upper-income	841	43.3	825	43.2	13	41.9	3	100.0
Unknown-income	2	0.1	2	0.1	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>1,943</b>	<b>100.0</b>	<b>1,909</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
	<b>Percentage of Total Farms:</b>			<b>98.3</b>		<b>1.6</b>		<b>.2</b>

2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.

## Community Contact

Examiners conducted community contact interviews with two community organizations that served this assessment area. The first community contact interview was held with an organization that worked to promote economic development opportunities within Prince William County. The contact stated there were several economic development needs within the county including small business counseling services for newly created and small businesses, access to small business lending, and the shortage of affordable workforce housing.

A second community contact interview was conducted with an organization that focused on economic development opportunities in Stafford County. The contact stated that Stafford County is one of the wealthiest counties in the United States with only small areas of blight. However, there were areas that needed revitalization including the Route 1 corridor and the historic southern portion of the county. The contact noted there were not enough local community banks to meet the small business loan demands. The contact suggested that banks needed to market their small business loans in such a way that small businesses are better aware of the available capital. Additionally, the contact noted that the building of affordable housing has essentially stopped, contributing to a shortage of affordable housing. Finally, the contact stated that institutions could partner with organizations such as SBA's Veterans Business Bootcamp to educate veterans on small business growth, given the proximity of Marine Corps Base Quantico.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 47900  
(WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV)**

**LENDING TEST**

M&T’s performance was rated Outstanding in the lending test for this assessment area. The bank’s lending activity demonstrated excellent responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected excellent penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of this assessment area to low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

**Lending Activity**

M&T’s lending activity demonstrated excellent responsiveness to the retail credit needs of this assessment area. This assessment area was competitive for financial services, with competitors including large financial institutions and regional banks. M&T’s market share of deposits was generally stable during the evaluation period. The bank’s HMDA lending was adequate, with a slight decrease each year; however, small business lending remained strong throughout the evaluation period.

In 2021, the bank ranked 13<sup>th</sup> out of 67 institutions with a deposit market share of 1.9%. In total HMDA lending, the bank ranked 53<sup>rd</sup> out of 890 reporters with a market share of 0.4%, including market shares of 0.3% in home purchase lending, 0.3% in refinance, 3.6% in home improvement, and 0.0% in multifamily loans. M&T ranked 11<sup>th</sup> out of 323 reporters with a market share of 2.2% in small business lending.

In 2020, the bank ranked 11<sup>th</sup> out of 67 institutions with a deposit market share of 1.9%. In total HMDA lending, the bank ranked 49<sup>th</sup> out of 894 reporters with a market share of 0.5%, including market shares of 0.5% in home purchase lending, 0.3% in refinance, 3.4% home improvement, and 1.3% in multifamily loans. M&T ranked 10<sup>th</sup> out of 336 reporters with a market share of 2.9% in small business lending.

In 2019, the bank ranked 14<sup>th</sup> out of 71 institutions with a deposit market share of 1.6%. In total HMDA lending, the bank ranked 43<sup>rd</sup> out of 802 reporters with a market share of 0.6%, including market shares of 0.4% in home purchase lending, 0.6% in refinance, 2.7% home improvement, and 0.5% in multifamily loans. M&T ranked 14<sup>th</sup> out of 231 reporters with a market share of 1.2% in small business lending.

M&T’s lending in this assessment area is summarized in the following table.

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	982	16.8%	111,764	4.2%
Home Purchase	1,657	28.3%	708,270	26.7%
Loan Purpose Not Applicable	708	12.1%	184,942	7.0%
Multi-Family	32	0.5%	677,534	25.6%
Refinancing	2,478	42.3%	966,503	36.5%
<b>Total HMDA</b>	<b>5,857</b>	<b>36.0%</b>	<b>2,649,013</b>	<b>70.7%</b>



<b>Total Small Business</b>	<b>10,410</b>	<b>64.0%</b>	<b>1,097,455</b>	<b>29.3%</b>
<b>TOTAL LOAN</b>	<b>16,267</b>	<b>100.0%</b>	<b>3,746,468</b>	<b>100.0%</b>

### Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected excellent penetration throughout the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area. Lending penetration in LMI tracts was good for home purchase, good for refinance, good for home improvement, adequate for multifamily, and excellent for small business loans.

### Gap Analysis

M&T demonstrated a good level of dispersion in LMI census tracts in this assessment area. In 2019, the bank's performance was at 50.4% and 72.5%, in LMI census tracts, respectively, and showed an increase in 2020, and similar performance in 2021. Overall, performance improved when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	127	63	50.4%
Moderate	276	76	72.5%
Middle	434	89	79.5%
Upper	424	100	76.4%
Income Unknown	18	15	16.7%
<b>2020</b>			
Low	127	41	67.7%
Moderate	276	26	90.6%
Middle	434	45	89.6%
Upper	424	37	91.3%
Income Unknown	18	12	33.3%
<b>2021</b>			
Low	127	38	70.1%
Moderate	276	48	82.6%
Middle	434	38	91.2%
Upper	424	52	87.7%
Income Unknown	18	13	27.8%

### Home Purchase Loans

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area.

In 2021, the bank made 4.0% by number and 3.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was similar to the 3.8% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made



4.6% by number and 3.6% by dollar in low-income census tracts. In 2021, the bank made 21.3% of home purchase loans by number and 16.1% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 17.0% of owner-occupied housing units located in moderate-income census tracts and was slightly above the aggregate, which made 17.9% by number and 13.0% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 4.0% by number and 3.0% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was similar to the 3.8% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made 4.6% by number and 3.7% by dollar in low-income census tracts. In 2020, the bank made 21.3% of home purchase loans by number and 15.5% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 17.0% of owner-occupied housing units located in moderate-income census tracts and was slightly above the aggregate, which made 18.0% by number and 13.4% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 2.9% by number and 2.1% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was slightly below the 3.8% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 4.6% by number and 3.6% by dollar in low-income census tracts. In 2019, the bank made 16.4% of home purchase loans by number and 11.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was similar to the 17.0% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 17.7% by number and 12.9% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 5.9% by number and 4.0% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly above the 3.8% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.4% by number and 2.7% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 16.7% by number and 11.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 17.0% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 14.3% by number and 10.4% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 3.0% by number and 1.7% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was slightly below the 3.8% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 2.9% by number and 2.4% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 14.3% by number and 8.1% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 17.0% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 12.3% by number and 9.2% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 3.4% by number and 2.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was similar to the 3.8% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made 4.0% by number and 3.0% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 17.1% by number and 10.8% by dollar of refinance loans in moderate-income census tracts. M&T's

refinance lending performance in moderate-income census tracts was similar to the 17.0% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 14.6% by number and 10.5% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area.

In 2021, the bank made 1.3% by number and 1.1% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 3.8% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 2.5% by number and 2.3% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 13.5% by number and 11.0% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was slightly below the 17.0% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 10.0% by number and 7.7% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 3.0% by number and 2.3% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was slightly below the 3.8% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 2.6% by number and 2.6% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 11.1% by number and 8.0% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 17.0% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 11.1% by number and 8.2% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 3.4% by number and 3.2% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was slightly below the 3.8% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 3.2% by number and 3.2% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 15.4% by number and 9.7% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was similar to the 17.0% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 12.0% by number and 8.7% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected adequate penetration throughout the assessment area.

In 2021, the bank did not make any multifamily loans in low-income census tracts. The bank made 25.0% by number and 22.2% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was similar to the 26.0% of multifamily housing units located in moderate-income census tracts and slightly above the aggregate, which made 20.4% by number and 20.3% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 8.3% by number and 0.2% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly below the 17.7% of multifamily housing units located in low-income census tracts and significantly below the aggregate, which made 28.8% by number and 29.7% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 8.3% by number and 9.8% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly below the 26.0% of multifamily housing units located in moderate-income census tracts and significantly below the aggregate, which made 22.9% by number and 22.6% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank made 25.0% by number and 16.0% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was above the 17.7% of multifamily housing units located in low-income census tracts and similar to the aggregate, which made 25.1% by number and 11.7% by dollar of home improvement loans in low-income census tracts. The bank did not make any multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 6.0% by number and 6.3% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 5.5% of businesses located in low-income census tracts and slightly above the aggregate, which made 5.1% by number and 5.0% by dollar of small business loans in low-income census tracts. In 2021, the bank made 20.0% by number and 20.6% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 18.6% of businesses located in moderate-income census tracts and similar to the aggregate, which made 18.9% by number and 19.4% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 5.6% by number and 5.5% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 5.5% of businesses located in low-income census tracts and slightly above the aggregate, which made 4.7% by number and 4.7% by dollar of small business loans in low-income census tracts. In 2020, the bank made 19.5% by number and 19.4% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 18.6% of businesses located in moderate-income census tracts and similar to the aggregate, which made 18.4% by number and 19.0% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 5.5% by number and 6.6% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 5.1% of businesses located in low-income census tracts and slightly above the aggregate, which made 4.5% by number and 4.4% by dollar of small business loans in low-income census tracts. In 2019, the bank made 21.9% by number and 21.4% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly above the 18.4% of businesses located in moderate-income census tracts and slightly above the aggregate, which made 18.3% by number and 18.1% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 13.8% by number and 7.3% by dollar to low-income borrowers and was below the 21.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 7.6% by number and 3.9% by dollar to low-income families. The bank's lending to moderate-income borrowers was 28.3% by number and 21.1% by dollar, which was above the aggregate performance of 20.8% by number, above 14.9% by dollar, and significantly above the 16.6% moderate-income families in the assessment area.

In 2020, the bank made 12.9% by number and 7.0% by dollar to low-income borrowers and was below the 21.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 8.0% by number and 4.3% by dollar to low-income families. The bank's lending to moderate-income borrowers was 22.0% by number and 16.9% by dollar, which was similar to the aggregate performance of 22.2% by number, similar to 16.2% by dollar, and above the 16.6% moderate-income families in the assessment area.

In 2019, the bank made 10.4% by number and 5.3% by dollar to low-income borrowers and was significantly below the 21.9% of low-income families in the assessment area. Performance was above aggregate lending, which made 7.6% by number and 3.9% by dollar to low-income families. The bank's lending to moderate-income borrowers was 23.1% by number and 16.3% by dollar, which was similar to the aggregate performance of 21.3% by number, similar to 15.3% by dollar, and above the 16.6% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 10.7% by number and 5.4% by dollar and was significantly above the aggregate lending data, at 6.7% by number and 3.7% by dollar. The bank's performance was significantly below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 23.9% by number and 16.7% by dollar, was significantly above the aggregate lending data at 15.4% by number, significantly above 11.1% by dollar, and above the 16.6% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 7.5% by number and 3.0% by dollar and was significantly above the aggregate lending data, at 4.5% by number and 2.4% by dollar. The bank's performance was significantly below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 15.2% by number and 8.3% by dollar, was slightly above the aggregate lending data at 13.2% by number, slightly below 9.4% by dollar, and similar to the 16.6% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 12.0% by number and 5.5% by dollar and was significantly above the aggregate lending data, at 6.3% by number and 3.3% by dollar. The bank's performance was below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 20.4% by number and 12.4% by dollar, was above the aggregate lending data at 14.6% by number, slightly above 10.0% by dollar, and slightly above the 16.6% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 8.8% by number and 5.4% by dollar and was significantly above the aggregate lending data, at 4.3% by number and 2.8% by dollar. The bank's performance was significantly below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 20.0% by number and 14.1% by dollar, was significantly above the aggregate lending data at 11.8% by number, significantly above 8.4% by dollar, and slightly above the moderate-income families in the assessment area at 16.6%.

In 2020, the bank's lending to low-income borrowers was 10.2% by number and 7.4% by dollar and was significantly above the aggregate lending data, at 5.0% by number and 3.3% by dollar. The bank's performance was significantly below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 16.1% by number and 13.3% by dollar, was above the aggregate lending data at 11.6% by number, significantly above 8.4% by dollar, and similar to the moderate-income families in the assessment area at 16.6%.

In 2019, the bank's lending to low-income borrowers was 12.7% by number and 7.8% by dollar and was significantly above the aggregate lending data, at 6.1% by number and 3.7% by dollar. The bank's performance was below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 26.4% by number and 20.1% by dollar, was significantly above the aggregate lending data at 15.3% by number, significantly above 10.5% by dollar, and significantly above the moderate-income families in the assessment area at 16.6%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 35.9% of loans by number and 24.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly below the aggregate lending data, at 47.8% by number and 28.6% by dollar, in addition to being significantly below the 91.7% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 76.2% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 41.7% of loans by number and 22.8% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 43.8% by number and 25.6% by dollar, in addition to being significantly below the 91.7% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank

also originated 72.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 60.3% of loans by number and 33.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly above the aggregate lending data, at 49.6% by number and 32.7% by dollar, in addition to being below the 91.2% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 78.0% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 77 loans for approximately \$381.0 million. The community development lending in this assessment area represented 9.7% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$190.5 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$94.1 million, this represented a significant increase by dollar volume. Additionally, the bank's annualized community development lending performance by number also increased to 38.5 community development loans, compared to 14.7 community development loans at the previous evaluation. Based on annualized community development loans to deposits, the bank ranked 2<sup>nd</sup> out of five when compared to similarly situated banks that primarily served this multistate assessment area.

The institution's community development loans by year and purpose are summarized in the table below.

MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)										
Community Development Lending										
January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	9	112,112	5	37,228	0	0	35	59,497	49	208,837
2021	11	105,834	6	50,513	0	0	11	15,855	28	172,202
<b>Total</b>	<b>20</b>	<b>217,946</b>	<b>11</b>	<b>87,741</b>	<b>0</b>	<b>0</b>	<b>46</b>	<b>75,353</b>	<b>77</b>	<b>381,039</b>

Examples of community development lending which benefited this assessment area included the following:

- In 2020, the bank made a \$23.0 million loan to fund the working capital needs of a healthcare organization within the assessment area that received a majority of its revenue from Medicaid. This loan helped to meet the community services needs of LMI individuals.

- In 2021, the bank made a \$5.0 million loan to fund new construction of multifamily buildings, which contained 30% of units allocated to LMI individuals. With this loan, the bank helped to support affordable housing.
- In 2020 and 2021, the bank originated 46 PPP loans in amounts greater than \$1 million, totaling approximately \$75.4 million, to businesses in LMI census tracts, which helped to revitalize and stabilize these communities.

### Innovative and/or Flexible Lending Practices

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### INVESTMENT TEST

M&T’s performance is rated High Satisfactory in the investment test for this assessment area. The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited good responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 137 qualified investments and grants totaling \$91.3 million in this assessment area, which included 3 new investments totaling \$12.1 million, prior period investments with a current balance of \$78.0 million, and 82 grants totaling \$1.2 million. The community development activity in this assessment area represented 7.0% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance increased since prior evaluation, with \$45.6 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$21.4 million at the previous evaluation. Although based on annualized investments and grants to deposits, the bank ranked 1<sup>st</sup> out of five compared to similarly situated banks that primarily served this multistate assessment area, the performance was primarily driven by prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	50	74,908	0	0	2	3,086	0	0	52	77,994
2020	1	11,876	1	100	0	0	0	0	2	11,976
2021	0	0	1	100	0	0	0	0	1	100
<b>Total</b>	<b>51</b>	<b>86,784</b>	<b>2</b>	<b>200</b>	<b>2</b>	<b>3,086</b>	<b>0</b>	<b>0</b>	<b>55</b>	<b>90,070</b>

<b>Investments</b>										
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>82</b>	<b>1,188</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>82</b>	<b>1,188</b>
<b>Grand Total</b>	<b>51</b>	<b>86,784</b>	<b>84</b>	<b>1,388</b>	<b>2</b>	<b>3,086</b>	<b>0</b>	<b>0</b>	<b>137</b>	<b>91,258</b>

The following are examples of community development investments that benefited this assessment area:

- In 2020, the bank made an investment totaling \$11.9 million in a security that was used to build properties that qualified for the LIHTC. With these investments, the bank supported affordable housing for LMI individuals.
- In 2020 and 2021, the bank made two investments totaling \$200,000 in a CDCU. A CDCU is a credit union with a mission of serving LMI people and communities and specializes in serving populations with limited access to safe financial services.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited good responsiveness to assessment area credit and community development needs. Of the bank’s new qualified investments, 33.3% primarily promoted affordable housing efforts, which is a community development need within this assessment area. Qualified grants promoted community services towards LMI individuals, which was also an identified community development need within this assessment area.

### **Community Development Initiatives**

The bank occasionally made use of innovative and/or complex investments to support community development initiatives. New investments consisted primarily of LIHTC and CDCU. The prior period investments primarily consisted of mortgage-backed securities and LIHTC.

### **SERVICE TEST**

M&T’s performance is rated High Satisfactory in the service test for this assessment area. Delivery systems were readily accessible to all portions of the assessment area. To the extent changes were made, the bank’s opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. The bank provided an adequate level of community development services in this assessment area.

### **Retail Services**

#### *Accessibility of Delivery Systems*

Delivery systems were readily accessible to all portions of the bank’s assessment area. M&T operated 70 full-service branches in this assessment area, of which 24 branch offices (34.3%) were in LMI census tracts. The bank maintained a total of 158 ATMs, 1 full-service ATM at each branch, except for 20 branches that had 2 full-service ATMs each and 1 location that had 3 full-service ATMs, and 66 stand-alone ATMs located in gas stations and supermarkets. Of the ATMs, 56 (35.4%) were located in LMI census tracts. The bank’s percentage of branches and ATMs were above the percentage of LMI census tracts in this MSA



(31.5%) and the percentage of the population residing in LMI census tracts (30.2%). Additionally, 47 of the bank’s branches were also adjacent to LMI census tracts, further improving accessibility.

***Changes in Branch Locations***

To the extent changes were made, the bank’s opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch and relocated one branch during the evaluation period in this assessment area. The closed branch was in an upper-income tract. Although the relocated branch was in an upper-income tract and moved to a middle-income tract, the new location was also adjacent to an LMI census tract, positively affecting the accessibility of the bank’s delivery systems in LMI geographies.

***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. Extended hours were offered in 32 (45.7%) branches, including 14 (58.3%) in LMI census tracts; 52 (74.3%) branches offered weekend hours, including 22 (91.7%) in LMI census tracts; and 48 (68.6%) branches, including 19 (79.2%) in LMI census tracts, offered drive-thru hours.

The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

**Community Development Services**

M&T provided an adequate level of community development services in this assessment area. The bank conducted 64 services during the evaluation period that primarily addressed community services. This activity accounted for 4.0% of the bank’s total number of community development services activity. On an annualized basis over 24 months, the bank made 32 community development services, which represented a decrease from the previous evaluations annualized performance of 174.1 community development services. However, this decrease can be attributed to the restrictions imposed due to COVID-19. Additionally, the bank had 243 community development hours during the evaluation period, which on an annualized basis was 121.5 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)</b>					
<b>Community Development Services</b>					
<b>January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	3	15	14	0	<b>32</b>
2021	12	11	9	0	<b>32</b>
<b>Total</b>	<b>15</b>	<b>26</b>	<b>23</b>	<b>0</b>	<b>64</b>

The following are examples of community development services that benefited this assessment area:

- From 2020 to 2021, three bank employees served on the boards of directors for nonprofit organizations that promoted affordable housing services. The organizations provided home lending

education, financially literacy services, and home counseling services to disadvantaged LMI individuals.

- From 2020 to 2021, ten bank employees served on the boards of organizations dedicated to providing various services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and emergency services to LMI populations within this assessment area.

## STATE OF NEW YORK

### CRA RATING FOR NEW YORK: OUTSTANDING

*The Lending Test is rated: Outstanding*

*The Investment Test is rated: High Satisfactory*

*The Service Test is rated: High Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected excellent responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an excellent record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made extensive use of innovative and/or flexible lending practices in serving assessment area credit needs.

#### INVESTMENT TEST

- Made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors.
- Exhibited good responsiveness to credit and community development needs.
- Occasionally used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were reasonably accessible to essentially all portions of the bank's assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided a relatively high level of community development services.

## SCOPE OF EXAMINATION

Examiners conducted full-scope reviews of the following three assessment areas in the state of New York:

1. MSA 10580 (Albany-Schenectady-Troy, NY)
2. MSA 15380 (Buffalo-Cheektowaga, NY)
3. MSA 40380 (Rochester, NY)

In order to derive the state rating, the full-scope assessment areas were weighted based on the proportion of loan originations, deposits, and branches in each area. M&T's combined full-scope areas made up 61.5% by number and 65.2% by dollar volume of the total lending activity; 83.0% of the deposits; 48.3% of the branches and 62.7% of the ATMs in the New York rated area.

Additionally, limited-scope reviews were conducted in the remaining New York assessment areas:

1. MSA 13780 (Binghamton, NY)
2. MSA 21300 (Elmira, NY)
3. MSA 27060 (Ithaca, NY)
4. MSA 28740 (Kingston, NY)
5. MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)
6. MSA 45060 (Syracuse, NY)
7. MSA 46540 (Utica-Rome, NY)
8. MSA 48060 (Watertown-Ft. Drum, NY)
9. Non-MSA Group A (Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, and Wyoming Counties)
10. Non-MSA Group B (Cayuga, Chenango, Cortland, and Seneca Counties)
11. Non-MSA Group C (Sullivan County)

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 180 of its 664 locations and 501 of its 1,882 ATMs in the state of New York rated area, not including branches or ATMs in any multistate assessment areas. This rated area generated approximately 35.5% by number and 27.0% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. According to the June 30, 2021 FDIC Summary of Deposit Report, M&T held approximately \$63.0 billion in deposits in the state of New York rated area, which accounted for 48.6% of the bank's total deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF NEW YORK

### LENDING TEST

M&T's Lending Test performance in the state of New York is rated Outstanding. Lending levels reflected excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflected good penetration throughout the assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited an excellent record of serving the credit needs of low-income individuals and areas and very small businesses. The bank was a leader in making community development loans. The bank made extensive use innovative and/or flexible lending practices in serving assessment area credit needs.

## Lending Activity

M&T's lending activity demonstrated excellent responsiveness to the retail credit needs of the assessment areas in this state. This conclusion was primarily based on the bank's excellent responsiveness in the MSA 15380 (Buffalo-Cheektowaga, NY), the MSA 40380 (Rochester, NY); and good responsiveness in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment areas.

The bank's lending in this state is summarized in the table below.

<b>Summary of Lending Activity in State of New York January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	4,255	14.5%	269,487	4.7%
Home Purchase	13,011	44.3%	2,104,108	36.5%
Loan Purpose Not Applicable	1,874	6.4%	213,457	3.7%
Multi-Family	265	0.9%	1,598,546	27.8%
Refinancing	9,938	33.9%	1,573,218	27.3%
<b>Total HMDA</b>	<b>29,343</b>	<b>49.4%</b>	<b>5,758,816</b>	<b>65.4%</b>
<b>Total Small Business</b>	<b>30,105</b>	<b>50.6%</b>	<b>3,051,207</b>	<b>34.6%</b>
<b>Total Small Farm</b>	<b>4</b>	<b>0.0</b>	<b>1,238</b>	<b>0.0</b>
<b>TOTAL LOANS</b>	<b>59,452</b>	<b>100.0%</b>	<b>8,811,261</b>	<b>100.0%</b>

## Geographic Distribution

The geographic distribution of loans reflected good penetration within the state of New York. Examiners based this conclusion on the distribution of loans in the LMI census tracts. The performance under the geographic distribution criterion was generally consistent for the assessment areas within the rated area. For details, please refer to the Geographic Distribution of Loans section for each full-scope assessment area.

## Borrower Distribution

The distribution of borrowers reflected, given the product lines offered by the institution, good penetration among retail customers of different income levels and among business customers of different sizes throughout the state of New York. Examiners based this conclusion on the percentage of loans to LMI borrowers. The performance under the borrower distribution criterion was generally consistent for the assessment areas within the rated area. For details, please refer to the Borrower Distribution section for each full-scope assessment area.

## Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of its assessment areas in this state, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

## Community Development Lending

M&T was a leader in making community development loans in the state of New York. This conclusion was primarily based on the bank being a leader in making community development loans in the MSA 10580

(Albany-Schenectady-Troy, NY), the MSA 40380 (Rochester, NY), and a relatively high level of community development loans in the MSA 15380 (Buffalo-Cheektowaga, NY) assessment areas. The community development lending in this rated area represented 27.4% of the bank's total dollar volume of community development lending.

The bank originated 240 qualified community development loans totaling approximately \$1.1 billion across the New York rated area, which represented an overall annualized performance over 24 months of 120 loans totaling \$540.6 million. Included in the bank's community development lending were 139 PPP loans in amounts greater than \$1 million, totaling approximately \$289.5 million cumulatively, that also had a primary purpose of revitalization and stabilization.

The bank's community development lending activity by assessment area for each community development purpose is summarized in the table below.

<b>State of New York Rated Area Community Development Lending January 1, 2020 to December 31, 2021</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
MSA 10580 (Albany-Schenectady-Troy, NY)	3	27,358	8	78,875	3	16,263	14	65,532	<b>28</b>	<b>188,028</b>
MSA 13780 (Binghamton, NY)	1	13,106	0	0	2	6,248	9	68,518	<b>12</b>	<b>87,872</b>
MSA 15380 (Buffalo-Cheektowaga, NY)	10	67,678	9	82,802	4	29,156	52	98,930	<b>75</b>	<b>278,566</b>
MSA 21300 (Elmira, NY)	0	0	0	0	0	0	1	4,542	<b>1</b>	<b>4,542</b>
MSA 27060 (Ithaca, NY)	1	8,071	0	0	0	0	0	0	<b>1</b>	<b>8,071</b>
MSA 28740 (Kingston, NY)	1	4,000	0	0	0	0	0	0	<b>1</b>	<b>4,000</b>
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	0	0	14	45,139	0	0	10	19,387	<b>24</b>	<b>64,525</b>
MSA 40380 (Rochester, NY)	9	29,598	11	154,908	6	15,509	30	62,526	<b>56</b>	<b>262,542</b>
MSA 45060 (Syracuse, NY)	2	10,242	0	0	1	2,353	17	39,332	<b>20</b>	<b>51,927</b>
MSA 46540 (Utica-Rome, NY)	1	500	0	0	0	0	5	13,385	<b>6</b>	<b>13,885</b>
MSA 48060 (Watertown-Ft. Drum, NY)	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
Non-Metropolitan A	0	0	1	500	0	0	2	4,076	<b>3</b>	<b>4,576</b>
Non-Metropolitan B	1	2,840	1	4,475	0	0	0	0	<b>2</b>	<b>7,315</b>
Non-Metropolitan C	1	5,325	1	4,000	0	0	0	0	<b>2</b>	<b>9,325</b>

Broader Statewide Regional Area (BSRA)	2	24,557	4	65,698	0	0	3	5,758	9	96,013
<b>Total</b>	<b>32</b>	<b>193,275</b>	<b>49</b>	<b>436,397</b>	<b>16</b>	<b>69,529</b>	<b>143</b>	<b>381,986</b>	<b>240</b>	<b>1,081,188</b>

### Innovative and/or Flexible Lending Practices

The institution made extensive use of innovative and/or flexible lending practices in order to serve assessment areas credit needs in this state. The bank’s products and services in the state of New York were consistent with those discussed at the institution level.

Additionally, the bank offered these programs in the state of New York:

- Low-Interest Rate Program: A below market rate program designed for first-time homebuyers who meet the State of New York Mortgage Agency (“SONYMA”) purchase price and income limits and are purchasing an existing property.
- Achieving the Dream: A below market interest rate program designed for low-income first-time homebuyers with a low down payment purchasing in a SONYMA target area. This program has lower minimum income, purchase price, and appraised value limits compared to the Low Interest Rate program.
- SONYMA’s Down Payment Assistance Loan (“DPAL”): A SONYMA second mortgage program designed to assist homebuyers with down payment assistance. Any additional funds available after the down payment is covered can be applied towards closing costs and prepaid items.
- Construction Incentive Program: A program designed for first-time homebuyers buying a newly constructed home and meet SONYMA income and purchase price limitations.
- Conventional Plus: This program combines the flexibility offered by Fannie Mae’s My Community Mortgage along with SONYMA’s DPAL. It is designed for borrowers whose income is at or below program limits.
- FHA Plus: This program provides the flexibility offered by FHA mortgages along with SONYMA’s DPAL.
- Remodel NY: This below market rate program is designed for first-time homebuyers purchasing an existing home for renovation and who meet SONYMA income and purchase price limitations.
- Neighborhood Revitalization: This is an additional \$20,000 in funding for borrowers purchasing a home in targeted areas as set by SONYMA.

### INVESTMENT TEST

M&T’s performance under the Investment Test in the state of New York is rated High Satisfactory. The bank had a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors. The bank exhibited good responsiveness to credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

M&T had a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. During the current evaluation period, the bank made 636 qualified community development investments and grants totaling approximately \$401.8 million, which included 106 investments totaling \$391.3 million and 530 grants totaling \$10.6 million. This activity represented an overall annualized performance over 24 months of 53 investments totaling \$195.6 million and 265 grants totaling \$5.3 million.

The institution's qualified investments and grants by assessment area and community development purpose are summarized in the table below.

State of New York Rated Area Community Development Investments and Grants January 1, 2020 to December 31, 2021										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
MSA 10580 (Albany-Schenectady-Troy, NY)	9	15,090	1	3,512	0	0	0	0	10	18,601
MSA 13780 (Binghamton, NY)	9	30,440	0	0	0	0	0	0	9	30,440
MSA 15380 (Buffalo-Cheektowaga, NY)	25	157,430	4	7,480	0	0	0	0	29	164,910
MSA 21300 (Elmira, NY)	0	0	0	0	0	0	0	0	0	0
MSA 27060 (Ithaca, NY)	3	18,186	0	0	0	0	0	0	3	18,186
MSA 28740 (Kingston, NY)	0	0	0	0	0	0	0	0	0	0
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	11	26,700	0	0	0	0	0	0	11	26,700
MSA 40380 (Rochester, NY)	13	53,141	1	3,293	0	0	0	0	14	56,434
MSA 45060 (Syracuse, NY)	6	27,549	0	0	1	4,788	0	0	7	32,337
MSA 46540 (Utica-Rome, NY)	1	255	0	0	0	0	0	0	1	255
MSA 48060 (Watertown-Ft. Drum, NY)	0	0	1	22,466	0	0	0	0	1	22,466
Non-Metropolitan A	12	6,547	0	0	0	0	1	2,309	13	8,856
Non-Metropolitan B	3	594	0	0	1	359	0	0	4	953
Non-Metropolitan C	3	10,868	0	0	0	0	1	253	4	11,121
<b>Investments Total</b>	<b>95</b>	<b>346,799</b>	<b>7</b>	<b>36,750</b>	<b>2</b>	<b>5,147</b>	<b>2</b>	<b>2,562</b>	<b>106</b>	<b>391,258</b>
<b>Grants Total</b>	<b>0</b>	<b>0</b>	<b>530</b>	<b>10,550</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>530</b>	<b>10,550</b>



<b>Grand Total</b>	<b>95</b>	<b>346,799</b>	<b>537</b>	<b>47,300</b>	<b>2</b>	<b>5,147</b>	<b>2</b>	<b>2,562</b>	<b>636</b>	<b>401,808</b>
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## **Responsiveness to Credit and Community Development Needs**

M&T exhibited good responsiveness to assessment area credit and community development needs. The bank's qualified investments primarily promoted affordable housing efforts, which is a community development need within these assessment areas. Qualified grants also promoted community services towards LMI individuals, which is also an identified community development need within the assessment areas.

### **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives.

### **SERVICE TEST**

M&T's performance under the Service Test in the state of New York is rated High Satisfactory. Delivery systems were reasonably accessible to essentially all portions of the institution's assessment area. The bank's record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or LMI individuals. The bank provided a relatively high level of community development services.

### **Retail Services**

#### ***Accessibility of Delivery Systems***

Delivery systems were reasonably accessible to essentially all portions of the bank's assessment areas in New York. Examiners based this conclusion primarily on the bank's performance within the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area, where 26.7% of the bank's branches and 42.3% of ATMs in this state were located; and the MSA 40380 (Rochester, NY) assessment area, where 15.0% of the bank's branches and 17.2% of ATMs in this state were located.

#### ***Changes in Branch Locations***

To the extent changes were made, the bank's opening and closing of branches did not adversely affect its accessibility of delivery systems, particularly in LMI areas. M&T did not open any branches and closed eight branches throughout its New York assessment areas, of which one was in a moderate-income census tract.

#### ***Reasonableness of Business Hours and Services***

M&T's business hours and services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI tracts and/or individuals.

Overall, the bank's products and services in the New York assessment areas were consistent with those discussed at the institution level.

### Community Development Services

M&T provided a relatively high level of community development services in its assessment areas in the state of New York. The bank conducted 642 qualified community service events, which represented an overall annualized performance over 24 months of 321 services. The bank's qualified community development services consisted of a wide variety of events related to financial education, technical assistance, and first-time homebuyer seminars.

The institution's community development services by assessment area and community development purpose are summarized in the table below.

<b>State of New York Rated Area Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
MSA 10580 (Albany-Schenectady-Troy, NY)	14	40	40	0	<b>64</b>
MSA 13780 (Binghamton, NY)	0	17	1	1	<b>19</b>
MSA 15380 (Buffalo-Cheektowaga, NY)	91	230	115	0	<b>436</b>
MSA 21300 (Elmira, NY)	0	5	0	0	<b>5</b>
MSA 27060 (Ithaca, NY)	0	11	0	0	<b>11</b>
MSA 28740 (Kingston, NY)	1	0	0	0	<b>1</b>
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	2	2	0	0	<b>4</b>
MSA 40380 (Rochester, NY)	0	43	13	0	<b>56</b>
MSA 45060 (Syracuse, NY)	1	12	2	0	<b>15</b>
MSA 46540 (Utica-Rome, NY)	0	7	0	0	<b>7</b>
MSA 48060 (Watertown-Ft. Drum, NY)	0	0	0	0	<b>0</b>
Non-Metropolitan A	6	5	0	0	<b>11</b>
Non-Metropolitan B	0	12	0	0	<b>12</b>
Non-Metropolitan C	0	0	0	0	<b>0</b>
<b>Total</b>	<b>115</b>	<b>385</b>	<b>141</b>	<b>1</b>	<b>642</b>

## METROPOLITAN AREA MSA 10580 (ALBANY-SCHENECTADY-TROY, NY) FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF THE INSTITUTION'S OPERATIONS

M&T operated 12 of its 664 locations and 16 of its 1,882 ATMs in this assessment area.

According to the June 30, 2021 FDIC Summary of Deposit Report, 23 institutions operated 268 offices within this assessment area during the evaluation period. M&T ranked 4<sup>th</sup> with approximately \$2.7 billion in deposits, which represented 8.4% of the deposit market share and accounted for 2.1% of the bank’s total branch deposits. This assessment area generated approximately 1.7% by number and 2.4% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions such as KeyBank, Bank of America, and Trustco Bank.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The MSA 10580 (Albany-Schenectady-Troy, NY) assessment area included Albany County, Rensselaer County, Saratoga County, and Schenectady County. According to the 2015 ACS, the population of this assessment area was 845,933. The assessment area consisted of 210 census tracts, of which 21 or 10.0% were low-income, 39 or 18.6% were moderate-income, 101 or 48.1% were middle-income, 46 or 21.9% were upper-income, and 3 or 1.4% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area had 200,849 families, of which 20.0% were low-income (7.3% of which were below the poverty level), 17.6% were moderate-income, 22.1% were middle-income, and 40.3% were upper-income.

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

<b>MSA 10580 (Albany-Schenectady-Troy, NY) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$88,177	\$95,647	8.5%
Albany County, NY	\$90,777	\$95,923	5.7%
Rensselaer County, NY	\$83,829	\$91,355	9.0%
Saratoga County, NY	\$95,656	\$106,258	11.1%

Schenectady County, NY	\$83,491	\$86,124	3.2%
MSA 10580 (Albany-Schenectady-Troy, NY)	\$88,611	\$95,438	7.7%
State of New York	\$78,570	\$87,270	11.1%
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey. 2016 - 2020 U.S. Census Bureau American Community Survey. Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### ***Housing Characteristics***

Based on the 2015 ACS data, the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area had 378,947 housing units, of which 56.8% were owner-occupied, 31.2% were rental, and 12.0% were vacant. Of the total housing units, 8.9% were located in low-income census tracts, 18.1% in moderate-income census tracts, 49.9% in middle-income census tracts, 22.9% in upper-income census tracts, and 0.2% in unknown-income census tracts. In low-income census tracts, 19.1% of housing units were owner-occupied, 56.1% were rental units, and 24.8% were vacant. In moderate-income census tracts, 39.6% of housing units were owner-occupied, 43.1% were rental units, and 17.3% were vacant.

The median age of housing stock in this assessment area was 58 years old, with 36.6% 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 2015 ACS, the median housing value in this assessment area was \$199,622 with an affordability ratio of 31.4. The median gross rent in the assessment area was \$913 per month.

<b>MSA 10580 (Albany-Schenectady-Troy, NY) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$199,622	31.4	\$913
Albany County, NY	\$208,400	28.7	\$919
Rensselaer County, NY	\$179,100	33.9	\$875
Saratoga County, NY	\$232,900	30.7	\$993
Schenectady County, NY	\$165,800	35.1	\$845
MSA 10580 (Albany-Schenectady-Troy, NY)	\$197,422	31.6	\$909
State of New York	\$283,400	20.9	\$1,132
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey.</i>			

### ***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 41.6% of all rental households had rental costs that exceeded 30% of their incomes, 75.4% of low-income rental households had rental costs that exceeded 30% of their income, and 28.0% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 17.7% of homeowners had housing costs that exceeded 30% of their incomes, 62.1% of low-income homeowners had housing costs that exceeded 30% of their income, and 32.0% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 10580 (Albany-Schenectady-Troy, NY) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	75.4%	28.0%	41.6%	62.1%	32.0%	17.7%
Albany County, NY	77.2%	32.1%	44.4%	63.2%	33.7%	17.6%
Rensselaer County, NY	71.5%	22.1%	40.1%	61.1%	31.0%	17.3%
Saratoga County, NY	76.2%	33.2%	35.7%	61.3%	32.9%	17.9%
Schenectady County, NY	74.3%	16.3%	43.8%	62.5%	28.7%	18.1%
MSA 10580 (Albany-Schenectady-Troy, NY)	75.0%	27.5%	41.6%	61.7%	31.2%	17.9%
State of New York	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

*\*Cost Burden is housing cost that equals 30% or more of household income.  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.*

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 35,713 businesses operating in this assessment area in 2021, of which 10.9% 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, 90.1% were small businesses with a GAR of \$1 million or less, of which 10.5% were located in low-income census tracts and 11.8% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.5% in 2019, increased to 6.9% in 2020, and decreased to 4.3% in 2021. The state of New York had an unemployment rate of 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021.

<b>MSA 10580 (Albany-Schenectady-Troy, NY) Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.5%	6.9%	4.3%
Albany County, NY	3.5%	6.9%	4.4%
Rensselaer County, NY	3.6%	6.7%	4.4%
Saratoga County, NY	3.2%	6.4%	3.8%
Schenectady County, NY	3.7%	7.7%	4.9%
MSA 10580 Albany-Schenectady-Troy, NY	3.5%	6.9%	4.3%
State of New York	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 following MSA 10580 (Albany-Schenectady-Troy, NY) Assessment Area Demographics Table:

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>								
<b>Assessment Area Demographics</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	21	10.0	11,600	5.8	4,110	35.4	40,246	20.0
Moderate-income	39	18.6	29,188	14.5	4,246	14.5	35,308	17.6
Middle-income	101	48.1	105,556	52.6	4,877	4.6	44,398	22.1
Upper-income	46	21.9	54,369	27.1	1,339	2.5	80,897	40.3
Unknown-income	3	1.4	136	0.1	10	7.4	0	0.0
<b>Total Assessment Area</b>	<b>210</b>	<b>100.0</b>	<b>200,849</b>	<b>100.0</b>	<b>14,582</b>	<b>7.3</b>	<b>200,849</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	33,751	6,458	3.0	19.1	18,937	56.1	8,356	24.8
Moderate-income	68,734	27,187	12.6	39.6	29,655	43.1	11,892	17.3
Middle-income	188,999	119,053	55.3	63.0	50,395	26.7	19,551	10.3
Upper-income	86,773	62,626	29.1	72.2	18,874	21.8	5,273	6.1
Unknown-income	690	86	0.0	12.5	308	44.6	296	42.9
<b>Total Assessment Area</b>	<b>378,947</b>	<b>215,410</b>	<b>100.0</b>	<b>56.8</b>	<b>118,169</b>	<b>31.2</b>	<b>45,368</b>	<b>12.0</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	3,901	10.9	3,387	10.5	427	14.2	87	16.7
Moderate-income	4,239	11.9	3,813	11.8	370	12.3	56	10.8
Middle-income	17,290	48.4	15,647	48.6	1,380	46.0	263	50.6
Upper-income	10,129	28.4	9,226	28.7	792	26.4	111	21.3
Unknown-income	154	0.4	122	0.4	29	1.0	3	0.6
<b>Total Assessment Area</b>	<b>35,713</b>	<b>100.0</b>	<b>32,195</b>	<b>100.0</b>	<b>2,998</b>	<b>100.0</b>	<b>520</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>90.1</b>		<b>8.4</b>		<b>1.5</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	5	0.9	5	0.9	0	0.0	0	0.0
Moderate-income	36	6.6	36	6.8	0	0.0	0	0.0
Middle-income	407	75.1	398	74.8	9	90.0	0	0.0
Upper-income	94	17.3	93	17.5	1	10.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>542</b>	<b>100.0</b>	<b>532</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>98.2</b>		<b>1.8</b>		<b>.0</b>	

2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.

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## **Community Contact**

Examiners conducted community contact interviews with two community organizations that served this assessment area.

The first contact was held with an advocacy organization dedicated to revitalizing rural communities. The organization noted that the cost of living is rising faster than incomes, resulting in an increase in poverty levels. Although people are aware of climate change, the organization indicated that jobs, housing, and healthcare are more immediate concerns for people in these communities. Additionally, since younger people are leaving rural communities, there is a problem of finding workers for these areas. Finally, the contact noted that remote work brought buyers from cities with cash offers, impacting housing prices, displacing the local population, and further contributing to the housing crisis in New York State.

The second community contact was made with a CDFI that promotes sustainable community development efforts for economically underserved people and communities in the Capital Region of New York State. The contact stated that for rural communities, the lack of physical branches is a challenge, as rural populations tend to be older, poorer, and not as tech-savvy. There has also been a substantial increase in requests from small businesses for financial literacy training, workshops, technical assistance, and one-on-one consulting. The contact stated that there is an opportunity for institutions to participate in a Community Investment Trust Model where small businesses can operate in community-owned buildings, located in LMI communities, for low rent. Finally, that contact mentioned that predatory lending for small businesses originated through credit card companies is a growing concern.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)**

### **LENDING TEST**

M&T's performance was excellent in the lending test for this assessment area. The bank's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of the assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank makes extensive use innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### **Lending Activity**

M&T's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. M&T ranked in the top five with its market share of deposits. Additionally, the bank's HMDA market share remained stable. Small business lending market share was good showing an increase in market share throughout the evaluation period.

In 2021, the bank ranked 4<sup>th</sup> out of 23 institutions with a deposit market share of 8.4%. In total HMDA lending, the bank ranked 16<sup>th</sup> out of 312 reporters with a market share of 1.7%, including market shares of 1.9% in home purchase lending, 1.4% in refinance, 2.0% in home improvement, and 2.3% in multifamily loans. M&T ranked 10<sup>th</sup> out of 139 reporters with a market share of 2.3% in small business lending.

In 2020, the bank ranked 5<sup>th</sup> out of 23 institutions with a deposit market share of 6.4%. In total HMDA lending, the bank ranked 19<sup>th</sup> out of 283 reporters with a market share of 1.3%, including market shares of 1.5% in home purchase lending, 1.1% in refinance, 1.5% home improvement, and 3.3% in multifamily loans. M&T ranked 8<sup>th</sup> out of 151 reporters with a market share of 3.7% in small business lending.

In 2019, the bank ranked 5<sup>th</sup> out of 22 institutions with a deposit market share of 5.6%. In total HMDA lending, the bank ranked 18<sup>th</sup> out of 286 reporters with a market share of 1.7%, including market shares of 1.7% in home purchase lending, 1.6% in refinance, 1.5% home improvement, and 5.5% in multifamily loans. M&T ranked 14<sup>th</sup> out of 110 reporters with a market share of 1.2% in small business lending.

M&T's lending in this assessment area is summarized in the following table:

<b>MSA 10580 (Albany-Schenectady-Troy, NY) Summary of Lending Activity January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	119	7.5%	8,696	1.4%
Home Purchase	701	44.1%	128,879	21.0%
Loan Purchase Not Applicable	235	14.8%	31,969	5.2%
Multi-Family	34	2.1%	342,175	55.7%
Refinancing	502	31.6%	102,995	16.8%
<b>Total HMDA</b>	<b>1,591</b>	<b>55.0%</b>	<b>614,714</b>	<b>77.5%</b>
<b>Total Small Business</b>	<b>1,298</b>	<b>44.9%</b>	<b>177,940</b>	<b>22.4%</b>
<b>Total Small Farm</b>	<b>2</b>	<b>0.1%</b>	<b>780</b>	<b>0.1%</b>
<b>TOTAL LOANS</b>	<b>2,891</b>	<b>100.0%</b>	<b>793,434</b>	<b>100.0%</b>

### Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area. Lending penetration in LMI tracts was excellent for home purchase, good for refinance, adequate for home improvement, good for multifamily, and good for small business loans.

### Gap Analysis

M&T demonstrated a good level of dispersion in LMI census tracts in this assessment area. The bank's performance in LMI census tracts fluctuated throughout the years but showed a general increasing trend. Overall, performance generally improved when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 10580 (Albany-Schenectady-Troy, NY) Lending Gap Analysis January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	21	4	81.0%
Moderate	39	12	69.2%
Middle	101	14	86.1%
Upper	46	6	87.0%



Income Unknown	3	1	66.7%
<b>2020</b>			
Low	21	1	95.2%
Moderate	39	2	94.9%
Middle	101	5	95.0%
Upper	46	0	100.0%
Income Unknown	3	3	0.0%.
<b>2021</b>			
Low	21	3	85.7%
Moderate	39	4	89.7%
Middle	101	7	93.1%
Upper	46	2	95.7%
Income Unknown	3	3	0.0%

### ***Home Purchase Loans***

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 9.5% by number and 4.1% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 3.0% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.1% by number and 2.6% by dollar in low-income census tracts. In 2021, the bank made 17.5% of home purchase loans by number and 10.8% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 12.6% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 16.1% by number and 11.2% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 11.7% by number and 4.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 3.0% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.2% by number and 1.8% by dollar in low-income census tracts. In 2020, the bank made 21.3% of home purchase loans by number and 11.0% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 12.6% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 13.7% by number and 9.5% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 3.2% by number and 1.8% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was similar to the 3.0% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 3.2% by number and 1.7% by dollar in low-income census tracts. In 2019, the bank made 27.9% of home purchase loans by number and 14.6% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 12.6% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 14.9% by number and 10.1% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 0.9% by number and 0.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 3.0% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 1.7% by number and 1.1% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 11.6% by number and 7.0% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 12.6% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 9.5% by number and 6.6% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 1.2% by number and 0.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 3.0% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 1.2% by number and 0.8% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 7.3% by number and 4.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 12.6% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 7.1% by number and 4.9% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 1.8% by number and 0.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 3.0% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made 2.0% by number and 1.2% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 6.2% by number and 3.3% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 12.6% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 8.9% by number and 6.3% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 1.9% by number and 1.4% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 3.0% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 2.0% by number and 2.2% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 15.4% by number and 8.6% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was slightly above the 12.6% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 9.8% by number and 8.1% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 3.2% by number and 1.4% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was similar to the 3.0% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.2% by number and 1.0% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 3.2% by number and 0.6% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 12.6% of owner-occupied housing units located in moderate-

income census tracts and significantly below the aggregate, which made 7.7% by number and 6.2% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 5.6% by number and 1.1% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly above the 3.0% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.0% by number and 1.9% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 5.6% by number and 3.4% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 12.6% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 8.9% by number and 7.6% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected good penetration throughout the assessment area.

In 2021, the bank made 30.0% by number and 4.3% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 14.4% of multifamily housing units located in low-income census tracts and above the aggregate, which made 20.1% by number and 13.9% by dollar of multifamily loans in low-income census tracts. In 2021, the bank made 20.0% by number and 9.5% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 19.4% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 29.0% by number and 16.7% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 30.0% by number and 25.9% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 14.4% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 15.8% by number and 14.5% by dollar of multifamily loans in low-income census tracts. In 2020, the bank made 40.0% by number and 31.9% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 19.4% of multifamily housing units located in moderate-income census tracts and significantly above the aggregate, which made 22.3% by number and 16.4% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank made 21.4% by number and 1.5% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 14.4% of multifamily housing units located in low-income census tracts and above the aggregate, which made 14.3% by number and 3.0% by dollar of multifamily loans in low-income census tracts. In 2019, the bank made 7.1% by number and 20.1% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was below the 19.4% of multifamily housing units located in moderate-income census tracts and significantly below the aggregate, which made 26.4% by number and 12.1% by dollar of home improvement loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 12.8% by number and 11.8% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly above the 10.9% of businesses located in low-income census tracts and slightly above the aggregate, which made 11.0% by number and 11.0% by dollar of small business loans in low-income census tracts. In 2021, the bank made 9.4% by number and 9.6% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 11.9% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 11.3% by number and 12.4% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 10.4% by number and 9.1% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 10.9% of businesses located in low-income census tracts and similar to the aggregate, which made 9.8% by number and 10.6% by dollar of small business loans in low-income census tracts. In 2020, the bank made 8.6% by number and 8.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was below the 11.9% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 11.3% by number and 12.0% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 14.5% by number and 10.0% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was significantly above the 9.7% of businesses located in low-income census tracts and significantly above the aggregate, which made 8.9% by number and 10.9% by dollar of small business loans in low-income census tracts. In 2019, the bank made 10.1% by number and 9.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 12.1% of businesses located in moderate-income census tracts and similar to the aggregate, which made 10.3% by number and 11.0% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 11.2% by number and 7.2% by dollar to low-income borrowers and was below the 20.0% of low-income families in the assessment area. Performance was similar to aggregate lending, which made 10.7% by number and 6.5% by dollar to low-income families. The bank's lending to moderate-income borrowers was 28.4% by number and 25.0% by dollar, which was similar to the aggregate performance of 26.7% by number, slightly above 21.9% by dollar, and significantly above the 17.6% moderate-income families in the assessment area.

In 2020, the bank made 18.8% by number and 10.9% by dollar to low-income borrowers and was similar to the 20.0% of low-income families in the assessment area. Performance was above aggregate lending, which made 12.8% by number and 8.0% by dollar to low-income families. The bank's lending to moderate-income borrowers was 26.9% by number and 23.8% by dollar, which was similar to the aggregate

performance of 28.3% by number, similar to 23.6% by dollar, and significantly above the 17.6% moderate-income families in the assessment area.

In 2019, the bank made 13.2% by number and 7.2% by dollar to low-income borrowers and was below the 20.0% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 8.7% by number and 5.0% by dollar to low-income families. The bank's lending to moderate-income borrowers was 29.2% by number and 24.2% by dollar, which was slightly above the aggregate performance of 25.3% by number, slightly above 20.0% by dollar, and significantly above the 17.6% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 8.9% by number and 5.1% by dollar and was slightly above the aggregate lending data, at 7.2% by number and 4.1% by dollar. The bank's performance was significantly below the 20.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.4% by number and 12.8% by dollar, was slightly below the aggregate lending data at 20.3% by number, slightly below 15.4% by dollar, and similar to the 17.6% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 4.8% by number and 2.6% by dollar and was below the aggregate lending data, at 6.8% by number and 3.7% by dollar. The bank's performance was significantly below the 20.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 23.6% by number and 16.9% by dollar, was slightly above the aggregate lending data at 20.1% by number, slightly above 15.1% by dollar, and above the 17.6% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 8.8% by number and 3.6% by dollar and was similar to the aggregate lending data, at 8.4% by number and 4.6% by dollar. The bank's performance was significantly below the 20.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 21.2% by number and 13.2% by dollar, was similar to the aggregate lending data at 19.5% by number, similar to 14.5% by dollar, and slightly above the 17.6% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 1.9% by number and 2.2% by dollar and was significantly below the aggregate lending data, at 7.3% by number and 5.6% by dollar. The bank's performance was significantly below the 20.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 26.9% by number and 19.4% by dollar, was above the aggregate lending data at 20.2% by number, slightly above 17.6% by dollar, and significantly above the moderate-income families in the assessment area at 17.6%.

In 2020, the bank's lending to low-income borrowers was 9.7% by number and 2.9% by dollar and was slightly above the aggregate lending data, at 8.2% by number and 6.4% by dollar. The bank's performance

was significantly below the 20.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 29.0% by number and 14.8% by dollar, was above the aggregate lending data at 22.4% by number, slightly below 17.2% by dollar, and significantly above the moderate-income families in the assessment area at 17.6%.

In 2019, the bank's lending to low-income borrowers was 8.3% by number and 5.9% by dollar and was similar to the aggregate lending data, at 8.1% by number and 6.1% by dollar. The bank's performance was significantly below the 20.0% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 16.7% by number and 22.7% by dollar, was slightly below the aggregate lending data at 18.7% by number, significantly above 14.8% by dollar, and similar to the moderate-income families in the assessment area at 17.6%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 39.1% of loans by number and 22.8% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 41.7% by number and 23.8% by dollar, in addition to being significantly below the 90.1% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 70.0% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 35.5% of loans by number and 21.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 34.8% by number and 20.0% by dollar, in addition to being significantly below the 90.1% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 61.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 54.1% of loans by number and 33.0% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 41.7% by number and 29.0% by dollar, in addition to being below the 89.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 64.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 28 loans for approximately \$188.0 million. The community development lending in this assessment area represented 4.8% by dollar volume of the bank's

total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$94.0 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$86.1 million, this represented an increase by dollar volume in performance. Additionally, based on annualized community development loans to deposits, the bank ranked 1<sup>st</sup> out of five, compared to similarly situated banks that primarily served this assessment area.

The institution’s community development loans by year and purpose are summarized in the table below.

<b>MSA 10580 (Albany-Schenectady-Troy, NY) Community Development Lending January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	2	11,908	5	65,075	2	10,413	12	62,059	<b>21</b>	<b>149,455</b>
2021	1	15,450	3	13,800	1	5,850	2	3,474	<b>7</b>	<b>38,574</b>
<b>Total</b>	<b>3</b>	<b>27,358</b>	<b>8</b>	<b>78,875</b>	<b>3</b>	<b>16,263</b>	<b>14</b>	<b>65,532</b>	<b>28</b>	<b>188,028</b>

Examples of community development lending which benefited this assessment area included the following:

- In 2020 and 2021, the bank made 3 loans totaling \$27.4 million to fund new construction or extension of multifamily buildings. These projects contained a percentage of units dedicated to LMI individuals. With these loans, the bank helped to support affordable housing.
- In 2021, the bank made an SBA 504 loan totaling \$5.9 million. This financing program offered by SBA promotes business growth and job creation through the purchase or improvement of real estate, equipment, and other fixed assets. With this loan, the bank helped to promoted economic development.
- In 2020 and 2021, the bank originated 12 PPP loans in amounts greater than \$1 million, totaling approximately \$29.0 million cumulatively, to organizations in LMI census tracts, which helped to revitalize and stabilize these communities.

### **Product Innovation**

The bank made extensive use of innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the state and institution level.

### **INVESTMENT TEST**

M&T’s performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made an adequate level of qualified community development investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. During the evaluation period, the bank reported 95 qualified investments and grants totaling \$19.1 million in this assessment area, which included 10 prior period investments with a current balance of \$18.6 million, and 85 grants totaling \$456,000. The bank did not have any new investments. The community development activity in this assessment area represented 1.5% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance decreased since the prior evaluation, with \$9.5 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$24.5 million at the previous evaluation. Based on annualized investments and grants to deposits, the bank ranked second out of four, compared to similarly situated banks that primarily served this assessment area; however, the performance was primarily driven by prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	9	15,090	1	3,512	0	0	0	0	10	18,602
<b>Total Investments</b>	<b>9</b>	<b>15,090</b>	<b>1</b>	<b>3,512</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>18,602</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>85</b>	<b>456</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>85</b>	<b>456</b>
<b>Grand Total</b>	<b>9</b>	<b>15,090</b>	<b>86</b>	<b>3,968</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>95</b>	<b>19,058</b>

The following are examples of community development investments and grants that benefited this assessment area:

- Three of the prior period investments, totaling \$12.8 million, were used to build properties that qualified for LIHTC. LIHTC is a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments, the bank supported affordable housing for LMI individuals.
- The bank’s \$456,000 in grants or donations were entirely comprised of funds to organizations that provided community services for LMI geographies or individuals.

### Responsiveness to Credit and Community Development Needs

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank did not have any new qualified investments. Of the prior period investments, 90.0% primarily promoted affordable housing efforts, which is a community development need within this assessment area. Qualified grants promoted community services towards LMI individuals, which was also an identified community development need within this assessment area.



## **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives. The bank did not have any new qualified investments. The prior period investments consisted of a mix of mortgage-backed securities and LIHTC.

## **SERVICE TEST**

M&T's performance was adequate in the service test for this assessment area. Delivery systems were accessible to essentially all portions of the assessment area. To the extent changes were made, the bank's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. The bank provided an adequate level of community development services in this assessment area.

## **Retail Services**

### ***Accessibility of Delivery Systems***

Delivery systems were accessible to essentially all portions of the institution's assessment area. M&T operated 12 branches in this assessment area, of which 3 branch offices (25.0%) were in LMI census tracts. The bank maintained a total of 16 ATMs, 1 full-service ATM at 10 branch locations, 2 full-service ATMs at one branch location, and 4 cash-only offsite ATMs, of which 4 (25.0%) were in LMI census tracts. As a result, the bank's percentage of branches and ATMs were similar to the percentage of LMI census tracts in this MSA (28.6%) and the percentage of the population residing in LMI census tracts (24.3%).

### ***Changes in Branch Locations***

To the extent changes were made, the institution's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened, closed, or relocated during the evaluation period.

### ***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced portions of the assessment area, particularly in LMI census tracts or to LMI individuals. None of the branches offered extended hours; six (50.0%) branches, but none of the branches in LMI census tracts, offered weekend hours; and ten (83.3%) branches, including one (33.3%) branch in a moderate-income tract, offered drive-thru hours in this assessment area.

The bank's products and services in this assessment area were consistent with those discussed at the institution level.

## **Community Development Services**

M&T provided an adequate level of community development services in this assessment area. The bank provided 64 services during the evaluation period that primarily addressed community services. This activity accounted for 4.0% of the bank's total number of community development services activity. On an annualized basis over 24 months, this represented a decrease as the bank conducted 32.0 community development services, compared to the previous evaluation's annualized performance of 51.0 community

development services. Additionally, the bank had 141 service hours during the evaluation period, which on an annualized basis was 70.5 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 10580 (Albany-Schenectady-Troy, NY) Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	2	14	2	0	<b>18</b>
2021	12	26	8	0	<b>46</b>
<b>Total</b>	<b>14</b>	<b>40</b>	<b>10</b>	<b>0</b>	<b>64</b>

The following are examples of community development services that benefited this assessment area:

- Six bank employees served on the board of organizations dedicated to providing various community services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and emergency services to LMI populations within the assessment area.
- In 2020 and 2021, a bank employee served on the board of nonprofit organization that promotes affordable housing services. The organization provided home lending education, financial literacy services, and home counseling services to disadvantaged LMI individuals.

# METROPOLITAN AREA MSA 15380 (BUFFALO-CHEEKTOWAGA, NY) FULL REVIEW

## SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank's performance in this assessment area as detailed in Appendix A.

## DESCRIPTION OF THE INSTITUTION'S OPERATIONS

M&T operated 48 of its 664 locations and 212 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 18 institutions operated 244 offices within this assessment area. M&T ranked 1<sup>st</sup> with approximately \$44.3 billion in deposits, which represented 63.0% of the deposit market share and accounted for 34.2% of the bank's total branch deposits. This assessment area generated approximately 14.1% by number and 10.7% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included financial institutions such as KeyBank, HSBC Bank, and Bank of America.

## PERFORMANCE CONTEXT

### *Demographic Characteristics*

The MSA 15380 (Buffalo-Cheektowaga, NY) assessment area included Erie County and Niagara County. 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, 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) Median Family Income Change			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Assessment Area	\$73,321	\$79,486	8.4%
Erie County, NY	\$73,866	\$80,437	8.9%
Niagara County, NY	\$71,318	\$75,900	6.4%

State of New York	\$78,570	\$87,270	11.1%
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey. 2016 - 2020 U.S. Census Bureau American Community Survey. Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### 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 tracts and 61 years in moderate-income 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 the assessment area was \$725 per month.

<b>MSA 15380 (Buffalo-Cheektowaga, NY) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$125,014	40.8	\$725
Erie County, NY	\$130,000	39.4	\$739
Niagara County, NY	\$108,000	45.8	\$654
State of New York	\$283,400	20.9	\$1,132
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey.</i>			

### Housing Cost Burden

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 43.7% of all rental households had rental costs that exceeded 30% of their incomes, 74.1% of low-income rental households had rental costs that exceeded 30% of their income, and 26.6% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 16.8% of homeowners had housing costs that exceeded 30% of their incomes, 61.0% of low-income homeowners had housing costs that exceeded 30% of their income, and 26.3% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 15380 (Buffalo-Cheektowaga, NY) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	74.1%	26.6%	43.7%	61.0%	26.3%	16.8%
Erie County, NY	75.3%	29.2%	44.2%	60.9%	26.8%	16.7%

Niagara County, NY	68.5%	13.8%	41.2%	61.1%	24.4%	17.4%
State of New York	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

*\*Cost Burden is housing cost that equals 30% or more of household income.  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.*

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 42,752 businesses operating in this assessment area in 2021, 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 census tracts and 11.7% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.2% in 2019, increased to 9.3% in 2020, and decreased to 5.5% in 2021. The state of New York had an unemployment rate of 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021.

<b>MSA 15380 (Buffalo-Cheektowaga, NY) Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.2%	9.3%	5.5%
Erie County, NY	4.1%	9.1%	5.5%
Niagara County, NY	4.8%	10.1%	5.7%
State of New York	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 following MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area Demographics Table:

<b>MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area Demographics</b>								
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	0.0
<b>Total Assessment Area</b>	<b>299</b>	<b>100.0</b>	<b>284,789</b>	<b>100.0</b>	<b>30,498</b>	<b>10.7</b>	<b>284,789</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
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	28.0	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	0.0	5.1	649	70.2	228	24.7
<b>Total Assessment Area</b>	<b>519,952</b>	<b>311,183</b>	<b>100.0</b>	<b>59.8</b>	<b>159,470</b>	<b>30.7</b>	<b>49,299</b>	<b>9.5</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3,959	9.3	3,405	8.9	530	12.6	24	5.1
Moderate-income	5,106	11.9	4,457	11.7	613	14.6	36	7.7
Middle-income	15,859	37.1	14,188	37.3	1,475	35.1	196	41.8
Upper-income	16,435	38.4	14,908	39.1	1,330	31.7	197	42.0
Unknown-income	1,393	3.3	1,124	3.0	253	6.0	16	3.4
<b>Total Assessment Area</b>	<b>42,752</b>	<b>100.0</b>	<b>38,082</b>	<b>100.0</b>	<b>4,201</b>	<b>100.0</b>	<b>469</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>89.1</b>		<b>9.8</b>		<b>1.1</b>
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	18	3.2	18	3.3	0	0.0	0	0.0
Moderate-income	17	3.0	14	2.6	3	10.3	0	0.0
Middle-income	283	49.7	268	49.7	15	51.7	0	0.0
Upper-income	245	43.1	233	43.2	11	37.9	1	100.0
Unknown-income	6	1.1	6	1.1	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>569</b>	<b>100.0</b>	<b>539</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	<b>Percentage of Total Farms:</b>			<b>94.7</b>		<b>5.1</b>		<b>.2</b>
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.</i>								

## Community Contact

Examiners conducted community contact interviews with two community organizations that serve this assessment area. The first contact was held with an organization dedicated to distributing food to people in need and providing work force development. According to the contact, inflation is the biggest problem, not unemployment. Currently, the organization is serving more individuals than during the height of COVID-19 and expects more people to require their services due to inflation and unaffordability. The contact would like to see greater transparency with financial institutions and their grant making decisions. Additionally, the contact stated that they would like to see banks set money aside for capital campaigns for larger, more impactful efforts, like building new facilities.

The second community contact was made with an organization dedicated to serving one of the poorest neighborhoods in Buffalo. The organization addresses issues with food scarcity, provides free after school programs and a community garden. The contact explained that the area is in dire need of affordable housing; there are no vacancies, existing homes are extremely old, do not have heat, and are in very poor condition. The contact also shared that additional investment is needed for local small businesses, including grocery stores, laundromats, and dollar stores which would help spark development and help to retain residents. Furthermore, the contact expressed the need for more targeted job training. They noted some industries have openings for skilled workers, but local graduates are not learning the appropriate skills to apply for

these jobs. The contact noted that the neighborhood also needs a good quality grocery store and that there are no bank branches located in the neighborhood.

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

### **LENDING TEST**

M&T's performance was good in the lending test for this assessment area. The bank's lending activity demonstrated excellent responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of the assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank made a relatively high level of community development loans in this assessment area. The bank made extensive use of innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### **Lending Activity**

M&T's lending activity demonstrated excellent responsiveness to the retail credit needs of this assessment area. M&T had a significant portion of the market share of deposits during the evaluation period. For HMDA lending, the bank ranked number one for all years with its market share, which remained relatively steady. Additionally, small business lending market share was also strong as the bank ranked top three throughout the evaluation period.

In 2021, the bank ranked 1<sup>st</sup> out of 18 institutions with a deposit market share of 63.0%. In total HMDA lending, the bank ranked 1<sup>st</sup> out of 291 reporters with a market share of 12.0%, including market shares of 11.5% in home purchase lending, 10.4% in refinance, 27.4% in home improvement, and 7.4% in multifamily loans. M&T ranked 2<sup>nd</sup> out of 125 reporters with a market share of 14.1% in small business lending.

In 2020, the bank ranked 1<sup>st</sup> out of 18 institutions with a deposit market share of 62.4%. In total HMDA lending, the bank ranked 1<sup>st</sup> out of 265 reporters with a market share of 13.2%, including market shares of 12.1% in home purchase lending, 11.7% in refinance, 30.7% home improvement, and 12.9% in multifamily loans. M&T ranked 1<sup>st</sup> out of 142 reporters with a market share of 19.2% in small business lending.

In 2019, the bank ranked 1<sup>st</sup> out of 18 institutions with a deposit market share of 63.6%. In total HMDA lending, the bank ranked 1<sup>st</sup> out of 286 reporters with a market share of 14.4%, including market shares of 12.2% in home purchase lending, 14.2% in refinance, 27.1% home improvement, and 11.5% in multifamily loans. M&T ranked 3<sup>rd</sup> out of 104 reporters with a market share of 7.5% in small business lending.

M&T's lending in this assessment area is summarized in the following table:

<b>MSA 15380 (Buffalo-Cheektowaga, NY) Summary of Lending Activity January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	2,177	16.3%	133,477	5.5%
Home Purchase	5,702	42.7%	1,042,413	42.6%

Loan Purpose Not Applicable	493	3.7%	49,238	2.0%
Multi-Family	76	0.6%	417,167	17.0%
Refinancing	4,894	36.7%	804,594	32.9%
<b>Total HMDA</b>	<b>13,342</b>	<b>56.6%</b>	<b>2,446,889</b>	<b>69.9%</b>
<b>Total Small Business</b>	<b>10,213</b>	<b>43.4%</b>	<b>1,055,756</b>	<b>30.1%</b>
<b>TOTAL LOANS</b>	<b>23,555</b>	<b>100.0%</b>	<b>3,502,645</b>	<b>100.0%</b>

### Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area. Lending penetration in LMI tracts was excellent for home purchase, good for refinance, good for home improvement, adequate for multifamily, and excellent for small business loans.

### Gap Analysis

M&T demonstrated an excellent level of dispersion in LMI census tracts in this assessment area. The bank's performance in LMI census tracts remained strong throughout the years. Overall, performance generally improved when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 15380 (Buffalo-Cheektowaga, NY)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	46	1	97.8%
Moderate	54	1	98.1%
Middle	119	0	100.0%
Upper	70	0	100.0%
Income Unknown	10	9	10.0%
<b>2020</b>			
Low	46	0	100.0%
Moderate	54	0	100.0%
Middle	119	0	100.0%
Upper	70	0	100.0%
Income Unknown	10	7	30.0%
<b>2021</b>			
Low	46	0	100.0%
Moderate	54	1	98.1%
Middle	119	0	100.0%
Upper	70	0	100.0%
Income Unknown	10	8	20.0%

### Home Purchase Loans

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area.



In 2021, the bank made 9.0% by number and 5.0% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 6.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 5.2% by number and 3.2% by dollar in low-income census tracts. In 2021, the bank made 12.4% of home purchase loans by number and 8.1% by dollar in moderate-income census tracts. The bank's home purchase lending performance was similar to the 11.4% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 11.5% by number and 8.0% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 6.8% by number and 3.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was similar to the 6.9% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 4.6% by number and 2.7% by dollar in low-income census tracts. In 2020, the bank made 11.6% of home purchase loans by number and 7.6% by dollar in moderate-income census tracts. The bank's home purchase lending performance was similar to the 11.4% of owner-occupied housing units located in moderate-income census tracts and was slightly above the aggregate, which made 10.5% by number and 7.1% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 6.9% by number and 3.6% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was similar to the 6.9% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 4.7% by number and 2.8% by dollar in low-income census tracts. In 2019, the bank made 10.8% of home purchase loans by number and 6.3% by dollar in moderate-income census tracts. The bank's home purchase lending performance was similar to the 11.4% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 10.0% by number and 6.6% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 3.4% by number and 1.9% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 6.9% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 2.5% by number and 1.5% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 7.0% by number and 4.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 11.4% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 7.1% by number and 4.6% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 2.7% by number and 1.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 6.9% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 2.1% by number and 1.3% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 4.9% by number and 3.1% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 11.4% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 5.5% by number and 3.5% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 2.8% by number and 1.3% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 6.9% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made 3.2% by number and 2.0% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 8.0% by number and 4.9% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 11.4% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 7.8% by number and 5.3% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area.

In 2021, the bank made 5.4% by number and 4.3% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was slightly below the 6.9% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 4.8% by number and 3.3% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 8.3% by number and 6.6% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 11.4% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 9.4% by number and 7.3% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 4.4% by number and 4.0% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 6.9% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 4.7% by number and 3.7% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 8.0% by number and 6.5% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 11.4% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 7.6% by number and 6.4% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 4.7% by number and 3.2% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 6.9% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 4.8% by number and 3.9% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 10.3% by number and 8.3% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was similar to the 11.4% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 9.0% by number and 7.5% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 8.3% by number and 0.2% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly below

the 17.3% of multifamily housing units located in low-income census tracts and below the aggregate, which made 13.9% by number and 4.5% by dollar of multifamily loans in low-income census tracts. In 2021, the bank made 37.5% by number and 4.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 12.8% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 19.9% by number and 9.2% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 18.5% by number and 22.5% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was above the 17.3% of multi-family housing units located in low-income census tracts and above the aggregate, which made 16.0% by number and 9.1% by dollar of multi-family loans in low-income census tracts. In 2020, the bank made 7.4% by number and 1.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was below the 12.8% of multifamily housing units located in moderate-income census tracts and significantly below the aggregate, which made 18.0% by number and 8.2% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank made 8.0% by number and 0.3% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was slightly above the 17.3% of multifamily housing units located in low-income census tracts and significantly below the aggregate, which made 16.3% by number and 7.2% by dollar of multi-family loans in low-income census tracts. In 2019, the bank made 16.0% by number and 0.7% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was above the 12.8% of multifamily housing units located in moderate-income census tracts and similar to the aggregate, which made 16.3% by number and 4.6% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 9.2% by number and 8.8% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 9.3% of businesses located in low-income census tracts and similar to the aggregate, which made 10.1% by number and 9.4% by dollar of small business loans in low-income census tracts. In 2021, the bank made 12.7% by number and 13.6% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 11.9% of businesses located in moderate-income census tracts and similar to the aggregate, which made 11.7% by number and 13.2% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 8.8% by number and 9.8% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 9.3% of businesses located in low-income census tracts and similar to the aggregate, which made 9.0% by number and 9.6% by dollar of small business loans in low-income census tracts. In 2020, the bank made 12.3% by number and 11.8% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 11.9% of businesses located in moderate-income census tracts and similar to the aggregate, which made 11.2% by number and 12.4% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 9.3% by number and 8.4% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 8.9%

of businesses located in low-income census tracts and similar to the aggregate, which made 9.8% by number and 10.6% by dollar of small business loans in low-income census tracts. In 2019, the bank made 13.9% by number and 16.3% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly above the 11.9% of businesses located in moderate-income census tracts and slightly above the aggregate, which made 11.3% by number and 13.0% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 10.3% by number and 6.1% by dollar to low-income borrowers and was significantly below the 22.2% of low-income families in the assessment area. Performance was slightly above aggregate lending, which made 9.0% by number and 5.3% by dollar to low-income families. The bank's lending to moderate-income borrowers was 23.0% by number and 17.4% by dollar, which was similar to the aggregate performance of 24.4% by number, similar to 18.7% by dollar, and above the 16.6% of moderate-income families in the assessment area.

In 2020, the bank made 9.4% by number and 5.2% by dollar to low-income borrowers and was significantly below the 22.2% of low-income families in the assessment area. Performance was slightly above aggregate lending, which made 8.6% by number and 4.9% by dollar to low-income families. The bank's lending to moderate-income borrowers was 23.8% by number and 17.5% by dollar, which was similar to the aggregate performance of 26.1% by number, slightly below 19.9% by dollar, and above the 16.6% moderate-income families in the assessment area.

In 2019, the bank made 11.8% by number and 5.8% by dollar to low-income borrowers and was below the 22.2% of low-income families in the assessment area. Performance was above aggregate lending, which made 9.4% by number and 5.4% by dollar to low-income families. The bank's lending to moderate-income borrowers was 26.9% by number and 17.7% by dollar, which was similar to the aggregate performance of 25.1% by number, similar to 18.9% by dollar, and significantly above the 16.6% moderate-income families in the assessment area.

#### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 7.3% by number and 3.6% by dollar and was similar to the aggregate lending data, at 6.8% by number and 3.7% by dollar. The bank's performance was significantly below the 22.2% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.4% by number and 11.8% by dollar, was similar to the aggregate lending data at 18.5% by number, similar to 12.9% by dollar, and similar to the 16.6% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 6.0% by number and 2.4% by dollar and was slightly above the aggregate lending data, at 4.9% by number and 2.4% by dollar. The bank's performance was significantly below the 22.2% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 16.9% by number and 10.0% by dollar, was similar to the aggregate lending data at 15.8% by number, similar to 10.2% by dollar, and similar to the 16.6% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 10.4% by number and 4.9% by dollar and was slightly above the aggregate lending data, at 9.4% by number and 5.2% by dollar. The bank's performance was significantly below the 22.2% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 18.7% by number and 11.7% by dollar, was similar to the aggregate lending data at 20.4% by number, slightly below 14.6% by dollar, and slightly above the 16.6% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 9.0% by number and 5.8% by dollar and was similar to the aggregate lending data, at 9.0% by number and 6.4% by dollar. The bank's performance was significantly below the 22.2% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.7% by number and 12.4% by dollar, was similar to the aggregate lending data at 19.7% by number, slightly below 15.5% by dollar, and similar to the moderate-income families in the assessment area at 16.6%.

In 2020, the bank's lending to low-income borrowers was 7.9% by number and 5.6% by dollar and was similar to the aggregate lending data, at 8.6% by number and 6.2% by dollar. The bank's performance was significantly below the 22.2% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 16.3% by number and 12.3% by dollar, was slightly below the aggregate lending data at 18.3% by number, slightly below 14.4% by dollar, and similar to the moderate-income families in the assessment area at 16.6%.

In 2019, the bank's lending to low-income borrowers was 12.5% by number and 9.0% by dollar and was slightly above the aggregate lending data, at 10.4% by number and 7.6% by dollar. The bank's performance was below the 22.2% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.1% by number and 14.9% by dollar, was similar to the aggregate lending data at 19.4% by number, similar to 15.7% by dollar, and slightly above the moderate-income families in the assessment area at 16.6%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 32.5% of loans by number and 18.0% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly below the aggregate lending data, at 43.1% by number and 24.8% by dollar, in addition to being significantly below the 89.1% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also

originated 76.2% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 40.9% of loans by number and 20.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 39.0% by number and 23.8% by dollar, in addition to being significantly below the 89.1% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 72.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 62.1% of loans by number and 31.9% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 42.6% by number and 33.0% by dollar, in addition to being below the 88.9% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 77.0% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T made a relatively high level of community development loans in this assessment area. During the evaluation period, community development lending totaled 75 loans for approximately \$278.6 million. The community development lending in this assessment area represented 7.1% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represents an annualized performance over 24 months of approximately \$139.3 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$143.1 million, this represented similar performance. However, based on annualized community development loans to deposits the bank ranked last out of four compared to similarly situated banks that primarily served this assessment area.

The institution's community development loans by year and purpose are summarized in the table below.

MSA 15380 (Buffalo-Cheektowaga, NY) Community Development Lending January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	7	50,398	3	3,800	4	29,156	40	79,346	54	162,700
2021	3	17,280	6	79,002	0	0	12	19,584	21	115,866
<b>Total</b>	<b>10</b>	<b>67,678</b>	<b>9</b>	<b>82,802</b>	<b>4</b>	<b>29,156</b>	<b>52</b>	<b>98,930</b>	<b>75</b>	<b>278,566</b>

Examples of community development lending which benefited this assessment area included the following:

- In 2020 and 2021, the bank made 7 loans totaling \$63.7 million to fund new construction or rehabilitation of multi-family buildings. These projects contained a percentage of units dedicated to LMI individuals. With these loans, the bank supported affordable housing.
- In 2021, the bank made an SBA 504 loan for \$509,000. This financing program offered by SBA promotes business growth and job creation through the purchase or improvement of real estate, equipment, and other fixed assets. With this loan, the bank helped to promote economic development.
- In 2020 and 2021, the bank originated 51 PPP loans in amounts greater than \$1 million, totaling approximately \$93.9 million cumulatively, to organizations in LMI census tracts, which helped to revitalize and stabilize these communities.

### Innovative and/or Flexible Lending Practices

The bank made extensive use of innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the state and institution level.

### INVESTMENT TEST

M&T’s performance was good in the investment test for this assessment area. The bank made a significant level of qualified community development investments and grants occasionally in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited good responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made a significant level of qualified community development investment and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 154 qualified investments and grants totaling \$172.5 million in this assessment area, which included 11 new investments totaling \$93.7 million and 18 prior period investments with a current balance of \$71.2 million, and 125 grants totaling \$7.6 million. The community development activity in this assessment area represented 13.3% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance increased since prior evaluation, with \$86.2 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$29.0 million at the previous evaluation. However, based on annualized investments and grants to deposits the bank ranked last out of four compared to similarly situated banks that primarily served this assessment area.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

MSA 15380 (Buffalo-Cheektowaga, NY) Qualified Investments and Grants January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	17	64,908	1	6,280	0	0	0	0	18	71,188

2020	5	55,254	1	100	0	0	0	0	6	55,354
2021	3	37,268	2	1,100	0	0	0	0	5	38,368
<b>Total Investments</b>	<b>25</b>	<b>157,430</b>	<b>4</b>	<b>7,480</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>29</b>	<b>164,910</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>125</b>	<b>7,561</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>125</b>	<b>7,561</b>
<b>Grand Total</b>	<b>25</b>	<b>157,430</b>	<b>129</b>	<b>15,041</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>154</b>	<b>172,471</b>

The following are examples of community development investments and grants that benefited this assessment area:

- From 2020 to 2021, the bank made seven investments totaling \$89.6 million, that were used to build properties that qualified for the LIHTC. The LIHTC is a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments the bank supported affordable housing for LMI individuals.
- In 2020 and 2021, the bank made two investments totaling \$200,000 in a CDCU. A CDCU is a credit union with a mission of serving LMI people and communities and specializes in serving populations with limited access to safe financial services.
- The bank's \$7.6 million in grants or donations were entirely comprised of funds to organizations that provide community services for LMI geographies or individuals.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited good responsiveness to assessment area credit and community development needs. Of the bank's new qualified investments, 72.7% primarily promoted affordable housing efforts, and 27.3% provided community services, which are community development needs within this assessment area. Qualified grants promoted community services towards LMI individuals.

### **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives. New investments consisted of a mix of LIHTC and CDCU. The prior period investments also primarily consisted of LIHTC and mortgage-backed securities.

### **SERVICE TEST**

M&T's performance was good in the service test for this assessment area. Delivery systems were reasonably accessible to essentially all portions of the assessment area. To the extent changes were made, the bank's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI census tracts or individuals. The bank provided a relatively high level of community development services in this assessment area.

### **Retail Services**

#### *Accessibility of Delivery Systems*

Delivery systems were reasonably accessible to essentially all portions of the institution's assessment area, including LMI areas. M&T operated 48 full-service branches in this assessment area, of which 14 (29.2%)



were in LMI census tracts. The bank maintained a total of 212 ATMs, 1 full-service ATM at 8 branch locations, 2 full-service ATMs at 29 branch locations, 3 full-service ATMs at 10 branch locations, 4 full-service ATMs at one location, and 112 standalone ATMs, of which 42 (19.8%) were in LMI census tracts. The bank’s percentage of branches was slightly lower than the percentage of LMI census tracts in this MSA (33.4%) and slightly higher than the percentage of the population residing in LMI census tracts (26.2%). The ATM percentage was lower than both the percentage of LMI census tracts in this MSA and the percentage of the population residing in LMI census tracts.

***Changes in Branch Locations***

To the extent changes were made, the institution’s opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. No branches were opened or closed, and one branch was relocated during the evaluation period. The relocated branch was in a low-income census tract and moved to another low-income census tract.

***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and individuals. Extended hours were offered in 29 (60.4%) branches, including 2 (14.3%) in LMI census tracts; 17 (35.4%) branches offered weekend hours, including 2 (14.3%) in LMI census tracts; and 32 (66.7%) branches, including 5 (35.7%) branches in LMI census tracts, offered drive-thru hours.

The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

**Community Development Services**

M&T provided a relatively high level of community development services in this assessment area. The bank conducted 436 services during the evaluation period that primarily addressed community services. This activity accounted for 27.5% of the bank’s total number of community development services activity. On an annualized basis over 24 months, this represented a decrease as the bank made 218.0 community development services, compared to the previous year’s annualized performance of 481.9 community development services. The bank had 2,512 service hours during the evaluation period, which on an annualized basis was 1,256 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 15380 (Buffalo-Cheektowaga, NY) Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	15	61	48	0	<b>124</b>
2021	76	169	67	0	<b>312</b>
<b>Total</b>	<b>91</b>	<b>230</b>	<b>115</b>	<b>0</b>	<b>436</b>

The following are examples of community development services that benefited this assessment area.

- From 2020 to 2021, 58 bank employees, including management, had 338 instances of serving on the board of organizations dedicated to providing various services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and emergency services to LMI populations within the assessment area.
- From 2020 to 2021, three bank employees had nine instances of assisting various community service organizations by providing financial education. The organizations provided a variety of services including financial literacy services and home counseling services to disadvantaged LMI individuals.

## METROPOLITAN AREA MSA 40380 (ROCHESTER, NY) FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF THE INSTITUTION'S OPERATIONS

M&T operated 27 of its 664 locations and 86 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 18 institutions operated 217 offices within this assessment area. M&T ranked 1<sup>st</sup> with approximately \$5.3 billion in deposits, which represented 21.3% of the deposit market share and accounted for 4.1% of the bank’s total branch deposits. This assessment area generated approximately 6.0% by number and 4.4% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included financial institutions such as KeyBank, Chase Bank, and Bank of America.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The MSA 40380 (Rochester, NY) assessment area included Livingston County, Monroe County, Ontario County, Orleans County, and Wayne County. According to the 2015 ACS, the population of this assessment area was 1,057,969. The assessment area consisted of 267 census tracts, of which 44 or 16.5% were low-income, 44 or 16.5% were moderate-income, 109 or 40.8% were middle-income, 61 or 22.8% were upper-income, and 9 or 3.4% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 40380 (Rochester, NY) assessment area had 262,179 families, of which 21.9% were low-income (10.4% of which were below the poverty level), 17.1% were moderate-income, 19.9% were middle-income, and 41.2% were upper-income.

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

<b>MSA 40380 (Rochester, NY) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$73,866	\$79,424	7.5%
Livingston County, NY	\$73,784	\$75,384	2.2%
Monroe County, NY	\$75,784	\$82,439	8.8%

Ontario County, NY	\$78,101	\$83,153	6.5%
Orleans County, NY	\$60,671	\$64,898	7.0%
Wayne County, NY	\$67,667	\$76,002	12.3%
MSA 40380 (Rochester, NY)	\$74,030	\$80,423	8.6%
State of New York	\$78,570	\$87,270	11.1%
<i>Source: 2011 – 2015 U.S. Census Bureau American Community Survey. 2016 – 2020 U.S. Census Bureau American Community Survey. Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### ***Housing Characteristics***

Based on the 2015 ACS data, the MSA 40380 (Rochester, NY) assessment area had 459,864 housing units, of which 61.4% were owner-occupied, 30.0% were rental, and 8.5% were vacant. Of the total housing units, 9.8% were located in low-income census tracts, 15.5% in moderate-income census tracts, 47.7% in middle-income census tracts, 27.0% in upper-income census tracts, and 0.1% in unknown-income census tracts. In low-income census tracts, 21.6% of housing units were owner-occupied, 61.8% were rental units, and 16.5% were vacant. In moderate-income census tracts, 46.1% of housing units were owner-occupied, 43.1% were rental units, and 10.8% were vacant.

The median age of housing stock in this assessment area was 57 years old, with 33.8% 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 2015 ACS, the median housing value in this assessment area was \$133,674 with an affordability ratio of 39.3. The median gross rent in the assessment area was \$808 per month.

<b>MSA 40380 (Rochester, NY) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$133,674	39.3	\$808
Livingston County, NY	\$121,200	42.7	\$721
Monroe County, NY	\$138,600	37.9	\$826
Ontario County, NY	\$145,700	39.4	\$809
Orleans County, NY	\$91,300	50.8	\$639
Wayne County, NY	\$112,900	45.0	\$694
MSA 40380 (Rochester, NY)	\$133,481	39.3	\$805
State of New York	\$283,400	20.9	\$1,132
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey.</i>			

### ***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 47.6% of all rental households had rental costs that exceeded 30% of their incomes, 77.7% of low-income rental households had rental costs that exceeded 30% of their income, and 32.0% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 18.5% of homeowners had housing costs that exceeded 30% of their incomes, 65.6% of low-income homeowners had housing costs that exceeded 30%

of their income, and 30.5% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 40380 (Rochester, NY) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	77.7%	32.0%	47.6%	65.6%	30.5%	18.5%
Livingston County, NY	78.4%	15.5%	49.3%	64.1%	21.5%	17.5%
Monroe County, NY	79.2%	35.3%	48.9%	66.1%	34.2%	18.5%
Ontario County, NY	77.1%	28.6%	43.2%	62.4%	23.2%	16.5%
Orleans County, NY	68.0%	14.9%	42.5%	67.6%	25.4%	22.7%
Wayne County, NY	64.6%	17.0%	38.8%	65.2%	26.6%	19.4%
MSA 40380 (Rochester, NY)	77.7%	32.0%	47.6%	65.4%	30.4%	18.5%
State of New York	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

\*Cost Burden is housing cost that equals 30% or more of household income.  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.

### ***Labor, Employment and Economic Characteristics***

According to D&B data, there were 40,529 businesses operating in this assessment area in 2021, of which 9.2% were located in low-income census tracts and 13.6% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.8% were small businesses with a GAR of \$1 million or less, of which 8.8% were located in low-income census tracts and 13.3% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.0% in 2019, increased to 7.9% in 2020, and decreased to 5.0% in 2021. The state of New York had an unemployment rate of 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021.

<b>MSA 40380 (Rochester, NY) Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.0%	7.9%	5.0%
Livingston County, NY	4.1%	6.8%	4.3%
Monroe County, NY	4.0%	8.2%	5.2%
Ontario County, NY	3.7%	6.9%	4.3%
Orleans County, NY	4.5%	8.1%	5.2%
Wayne County, NY	3.9%	7.1%	4.5%
MSA 40380 (Rochester, NY)	4.0%	7.8%	4.9%
State of New York	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 following MSA 40380 (Rochester, NY) Assessment Area Demographics Table:

<b>MSA 40380 (Rochester, NY)</b>								
<b>Assessment Area Demographics</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	44	16.5	20,378	7.8	8,945	43.9	57,294	21.9
Moderate-income	44	16.5	34,370	13.1	6,724	19.6	44,806	17.1
Middle-income	109	40.8	126,957	48.4	9,256	7.3	52,165	19.9
Upper-income	61	22.8	80,369	30.7	2,224	2.8	107,914	41.2
Unknown-income	9	3.4	105	0.0	4	3.8	0	0.0
<b>Total Assessment Area</b>	<b>267</b>	<b>100.0</b>	<b>262,179</b>	<b>100.0</b>	<b>27,153</b>	<b>10.4</b>	<b>262,179</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	44,930	9,726	3.4	21.6	27,773	61.8	7,431	16.5
Moderate-income	71,159	32,781	11.6	46.1	30,673	43.1	7,705	10.8
Middle-income	219,410	146,765	51.9	66.9	53,806	24.5	18,839	8.6
Upper-income	124,078	93,238	33.0	75.1	25,715	20.7	5,125	4.1
Unknown-income	287	68	0.0	23.7	189	65.9	30	10.5
<b>Total Assessment Area</b>	<b>459,864</b>	<b>282,578</b>	<b>100.0</b>	<b>61.4</b>	<b>138,156</b>	<b>30.0</b>	<b>39,130</b>	<b>8.5</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	3,745	9.2	3,210	8.8	504	13.7	31	6.9
Moderate-income	5,505	13.6	4,845	13.3	603	16.4	57	12.8
Middle-income	17,962	44.3	16,141	44.3	1,579	42.9	242	54.1
Upper-income	13,252	32.7	12,161	33.4	974	26.5	117	26.2
Unknown-income	65	0.2	45	0.1	20	0.5	0	0.0
<b>Total Assessment Area</b>	<b>40,529</b>	<b>100.0</b>	<b>36,402</b>	<b>100.0</b>	<b>3,680</b>	<b>100.0</b>	<b>447</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>89.8</b>		<b>9.1</b>		<b>1.1</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
	Low-income	7	0.7	7	0.8	0	0.0	0
Moderate-income	77	8.0	70	7.7	7	13.2	0	0.0
Middle-income	721	74.7	678	74.4	42	79.2	1	100.0
Upper-income	160	16.6	156	17.1	4	7.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>965</b>	<b>100.0</b>	<b>911</b>	<b>100.0</b>	<b>53</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	<b>Percentage of Total Farms:</b>			<b>94.4</b>		<b>5.5</b>		<b>.1</b>

2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.

## **Community Contact**

Examiners conducted community contact interviews with two community organizations that serve this assessment area. The first contact was held with a community organization dedicated to providing food and other community services to LMI families. The second community contact was made with a public interest law firm that advocates for low-income New Yorkers primarily in Rochester and other areas of New York. The contacts stated that foreclosures and evictions increased significantly driven by interest rate and out-of-town cash buyers which drove up pricing since the pandemic. Due to inflation, people are also not earning enough to offset living expenses. The community kitchen organization saw a 50% increase during COVID-19 with an expected increase year over year. Additionally, the cost of food affects the operational costs for the organization.

The organizations believe financial institutions can do more by partnering with community organizations for longer-term projects and increase their grants/donations. Additionally, there is a big footprint in the middle of the city of Rochester that has no bank branches. Banks have an opportunity to provide additional products and services including no closing costs or downpayment, waived overdraft fees, less stringent underwriting, loan modifications as needed, small dollar loans, credit repair and financial counseling/financial literacy, foreclosure assistance, and focus on lending to developers that promote affordable housing.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 40380 (ROCHESTER, NY)**

### **LENDING TEST**

M&T's performance was excellent in the lending test for this assessment area. The bank's lending activity demonstrated excellent responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank made extensive use of innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### **Lending Activity**

M&T's lending activity demonstrated excellent responsiveness to the retail credit needs of this assessment area. M&T ranked 1<sup>st</sup> with a large portion of the market share of deposits during the evaluation period. The HMDA lending market share remained steady as the bank ranked in the top ten. Additionally, small business lending market share was also strong with an increase in market share performance throughout the evaluation period.

In 2021, the bank ranked 1<sup>st</sup> out of 18 institutions with a deposit market share of 21.3%. In total HMDA lending, the bank ranked 9<sup>th</sup> out of 275 reporters with a market share of 4.0%, including market shares of 5.0% in home purchase lending, 2.7% in refinance, 6.0% in home improvement, and 5.6% in multifamily loans. M&T ranked 4<sup>th</sup> out of 126 reporters with a market share of 8.8% in small business lending.

In 2020, the bank ranked 1<sup>st</sup> out of 18 institutions with a deposit market share of 20.7%. In total HMDA lending, the bank ranked 8<sup>th</sup> out of 264 reporters with a market share of 3.5%, including market shares of

4.0% in home purchase lending, 2.3% in refinance, 9.3% home improvement, and 8.8% in multifamily loans. M&T ranked 3<sup>rd</sup> out of 149 reporters with a market share of 11.9% in small business lending.

In 2019, the bank ranked 1<sup>st</sup> out of 19 institutions with a deposit market share of 20.0%. In total HMDA lending, the bank ranked 6<sup>th</sup> out of 249 reporters with a market share of 4.4%, including market shares of 3.7% in home purchase lending, 4.6% in refinance, 8.2% home improvement, and 13.7% in multifamily loans. M&T ranked 7<sup>th</sup> out of 102 reporters with a market share of 5.2% in small business lending.

M&T's lending in this assessment area is summarized in the following table.

<b>MSA 40380 (Rochester, NY) Summary of Lending Activity January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	582	13.2%	36,404	4.4%
Home Purchase	2,165	49.1%	247,677	30.2%
Loan Purpose Not Applicable	354	8.0%	35,055	4.3%
Multi-Family	62	1.4%	330,303	40.2%
Refinancing	1,244	28.2%	171,561	20.9%
<b>Total HMDA</b>	<b>4,407</b>	<b>43.6%</b>	<b>821,000</b>	<b>56.7%</b>
<b>Total Small Business</b>	<b>5,704</b>	<b>56.4%</b>	<b>626,143</b>	<b>43.3%</b>
<b>TOTAL LOANS</b>	<b>10,111</b>	<b>100.0%</b>	<b>1,447,143</b>	<b>100.0%</b>

### Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 40380 (Rochester, NY) assessment area. Lending penetration in LMI tracts was excellent for home purchase, good for refinance, good for home improvement, good for multifamily, and good for small business loans.

### Gap Analysis

M&T demonstrated an excellent level of dispersion in LMI census tracts in this assessment area. The bank's performance in LMI census tracts remained strong throughout the years. Overall, performance generally improved when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 40380 (Rochester, NY) Lending Gap Analysis January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	44	9	79.5%
Moderate	44	2	95.5%
Middle	109	3	97.2%
Upper	61	0	100.0%
Income Unknown	9	7	22.2%
<b>2020</b>			
Low	44	3	93.2%



Moderate	44	2	95.5%
Middle	109	2	98.2%
Upper	61	0	100.0%
Income Unknown	9	7	22.2%
<b>2021</b>			
Low	44	6	86.4%
Moderate	44	0	100.0%
Middle	109	2	98.2%
Upper	61	0	100.0%
Income Unknown	9	8	11.1%

### ***Home Purchase Loans***

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 6.3% by number and 3.6% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 3.4% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.0% by number and 2.2% by dollar in low-income census tracts. In 2021, the bank made 26.5% of home purchase loans by number and 18.9% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 11.6% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 13.6% by number and 8.8% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 5.0% by number and 2.2% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 3.4% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 3.4% by number and 1.8% by dollar in low-income census tracts. In 2020, the bank made 23.6% of home purchase loans by number and 16.0% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 11.6% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 12.4% by number and 7.9% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 3.4% by number and 1.7% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was similar to the 3.4% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 3.1% by number and 1.6% by dollar in low-income census tracts. In 2019, the bank made 18.5% of home purchase loans by number and 11.4% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 11.6% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 11.7% by number and 7.3% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 2.1% by number and 1.3% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 3.4% of owner-

occupied housing units located in low-income census tracts and above the aggregate, which made 1.5% by number and 1.0% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 7.0% by number and 4.7% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 11.6% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 7.7% by number and 5.3% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 0.8% by number and 0.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 3.4% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 1.4% by number and 1.0% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 6.4% by number and 4.0% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 11.6% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 5.9% by number and 3.9% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 2.7% by number and 2.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was slightly below the 3.4% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 2.4% by number and 1.6% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 6.6% by number and 4.9% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 11.6% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 9.4% by number and 6.3% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area.

In 2021, the bank made 2.2% by number and 1.1% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 3.4% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 1.7% by number and 1.0% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 11.5% by number and 5.9% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was similar to the 11.6% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 9.2% by number and 6.4% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 1.5% by number and 1.5% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 3.4% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 2.1% by number and 1.3% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 6.0% by number and 3.8% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 11.6% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 8.1% by number and 5.5% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 3.5% by number and 2.8% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was similar to the 3.4% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.3% by number and 1.5% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 5.0% by number and 2.7% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 11.6% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 8.9% by number and 6.1% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected good penetration throughout the assessment area.

In 2021, the bank made 18.8% by number and 3.4% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was above the 16.7% of multifamily housing units located in low-income census tracts and below the aggregate, which made 26.8% by number and 21.3% by dollar of multifamily loans in low-income census tracts. In 2021, the bank made 25.0% by number and 5.6% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was above the 18.8% of multifamily housing units located in moderate-income census tracts and similar to the aggregate, which made 23.5% by number and 7.1% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 25.0% by number and 5.2% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was above the 16.7% of multifamily housing units located in low-income census tracts and similar to the aggregate, which made 24.0% by number and 8.0% by dollar of multifamily loans in low-income census tracts. In 2020, the bank made 17.9% by number and 4.2% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was similar to the 18.8% of multifamily housing units located in moderate-income census tracts and slightly below the aggregate, which made 23.5% by number and 15.7% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank made 11.1% by number and 1.6% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was below the 16.7% of multifamily housing units located in low-income census tracts and below the aggregate, which made 18.8% by number and 4.5% by dollar of multifamily loans in low-income census tracts. In 2019, the bank made 16.7% by number and 5.5% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was similar to the 18.8% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 29.9% by number and 16.8% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 9.1% by number and 11.7% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 9.2% of businesses located in low-income census tracts and similar to the aggregate, which made 8.4% by number and 10.2% by dollar of small business loans in low-income census tracts. In 2021, the bank made 7.8% by number and 9.1% by dollar of small business loans in moderate-income census tracts. M&T's small business

lending performance in moderate-income census tracts was below the 13.6% of businesses located in moderate-income census tracts and below the aggregate, which made 11.2% by number and 11.9% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 11.2% by number and 12.4% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly above the 9.2% of businesses located in low-income census tracts and above the aggregate, which made 8.2% by number and 10.0% by dollar of small business loans in low-income census tracts. In 2020, the bank made 8.3% by number and 10.5% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was below the 13.6% of businesses located in moderate-income census tracts and below the aggregate, which made 11.1% by number and 12.4% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 9.9% by number and 13.6% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly above the 9.0% of businesses located in low-income census tracts and above the aggregate, which made 7.5% by number and 8.9% by dollar of small business loans in low-income census tracts. In 2019, the bank made 10.1% by number and 12.8% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was below the 13.7% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 11.2% by number and 13.7% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 21.5% by number and 17.1% by dollar to low-income borrowers and was similar to the 21.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 11.8% by number and 6.9% by dollar to low-income families. The bank's lending to moderate-income borrowers was 33.9% by number and 34.8% by dollar, which was above the aggregate performance of 24.6% by number, significantly above 19.1% by dollar, and significantly above the 17.1% moderate-income families in the assessment area.

In 2020, the bank made 18.2% by number and 10.9% by dollar to low-income borrowers and was slightly below the 21.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 9.5% by number and 5.3% by dollar to low-income families. The bank's lending to moderate-income borrowers was 29.8% by number and 26.8% by dollar, which was above the aggregate performance of 23.0% by number, significantly above 17.4% by dollar, and significantly above the 17.1% moderate-income families in the assessment area.

In 2019, the bank made 16.9% by number and 10.7% by dollar to low-income borrowers and was slightly below the 21.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 9.3% by number and 5.1% by dollar to low-income families. The bank's

lending to moderate-income borrowers was 33.1% by number and 27.9% by dollar, which was above the aggregate performance of 24.8% by number, significantly above 18.5% by dollar, and significantly above the 17.1% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 10.9% by number and 6.0% by dollar and was above the aggregate lending data, at 7.9% by number and 4.3% by dollar. The bank's performance was significantly below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 26.5% by number and 19.4% by dollar, was above the aggregate lending data at 20.6% by number, above 14.5% by dollar, and significantly above the 17.1% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 7.1% by number and 3.8% by dollar and was above the aggregate lending data, at 4.8% by number and 2.4% by dollar. The bank's performance was significantly below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.8% by number and 12.0% by dollar, was slightly above the aggregate lending data at 15.0% by number, above 9.6% by dollar, and similar to the 17.1% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 10.2% by number and 5.4% by dollar and was similar to the aggregate lending data, at 9.3% by number and 5.2% by dollar. The bank's performance was significantly below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 22.5% by number and 14.8% by dollar, was similar to the aggregate lending data at 20.5% by number, similar to 14.2% by dollar, and above the 17.1% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 15.3% by number and 10.5% by dollar and was significantly above the aggregate lending data, at 8.9% by number and 6.7% by dollar. The bank's performance was below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 25.1% by number and 22.2% by dollar, was similar to the aggregate lending data at 23.5% by number, slightly above 18.6% by dollar, and above the moderate-income families in the assessment area at 17.1%.

In 2020, the bank's lending to low-income borrowers was 11.0% by number and 7.9% by dollar and was significantly above the aggregate lending data, at 7.2% by number and 5.4% by dollar. The bank's performance was below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 18.5% by number and 14.6% by dollar, was similar to the aggregate lending data at 19.2% by number, similar to 14.0% by dollar, and similar to the moderate-income families in the assessment area at 17.1%.

In 2019, the bank's lending to low-income borrowers was 7.5% by number and 3.5% by dollar and was similar to the aggregate lending data, at 7.5% by number and 4.9% by dollar. The bank's performance was significantly below the 21.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 16.1% by number and 9.7% by dollar, was slightly below the aggregate lending data at 19.1% by number, below 15.1% by dollar, and similar to the moderate-income families in the assessment area at 17.1%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 38.8% of loans by number and 23.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 41.2% by number and 25.1% by dollar, in addition to being significantly below the 89.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 73.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 43.2% of loans by number and 20.8% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 33.3% by number and 21.5% by dollar, in addition to being significantly below the 89.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 72.1% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 62.5% of loans by number and 33.1% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 45.3% by number and 31.6% by dollar, in addition to being below the 89.5% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 74.0% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited an excellent record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 56 loans for approximately \$262.5 billion. The community development lending in this assessment area represented 6.7% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$131.3 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$52.9 million, this represented a significant increase by dollar volume in performance. Based on annualized community development loans to deposits, the bank ranked 1<sup>st</sup> out of four compared to similarly situated banks that primarily served this assessment area.

The institution’s community development loans by year and purpose are summarized in the table below.

<b>MSA 40380 (Rochester, NY) Community Development Lending January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	6	19,098	5	82,329	6	15,509	21	40,710	<b>38</b>	<b>157,647</b>
2021	3	10,500	6	72,579	0	0	9	21,816	<b>18</b>	<b>104,895</b>
<b>Total</b>	<b>9</b>	<b>29,598</b>	<b>11</b>	<b>154,908</b>	<b>6</b>	<b>15,509</b>	<b>30</b>	<b>62,526</b>	<b>56</b>	<b>262,542</b>

Examples of community development lending which benefited this assessment area included the following:

- In 2020, the bank renewed a \$750,000 line of credit to support the working capital needs of a non-profit nursing facility where the majority of the population receive Medicaid. Through this loan, the bank provided community services to LMI individuals.
- In 2020, the bank made six SBA 504 loans totaling \$15.5 million. This financing program offered by SBA promotes business growth and job creation through the purchase or improvement of real estate, equipment, and other fixed assets. With this loan, the bank helped to promote economic development.
- In 2020 and 2021, the bank originated 30 PPP loans in amounts greater than \$1 million, totaling approximately \$60.4 million cumulatively, to organizations in LMI census tracts, which helped to revitalize and stabilize these communities.

**Innovative and/or Flexible Lending Practices**

The bank made extensive use of innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the state and institution level.

Additionally, in this assessment area, the bank offered a University Home Ownership Incentive Program with Rochester University. This program was designed for borrowers who are purchasing a home in the city of Rochester where the bank provides a \$3,000 lender credit in combination with \$3,000 in secured grants from the City of Rochester, and \$3,000 in grants from the University.

**INVESTMENT TEST**

M&T’s performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank had an adequate level of qualified community development investment and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 104 qualified investments and grants totaling \$57.3 million in this assessment area, which included one new investment for \$10.5 million, 13 prior period investments with a current balance of \$45.9 million, and 90 grants totaling \$839,000. The community development activity in this assessment area represented 4.4% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance slightly increased since prior evaluation, with \$28.6 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$25.0 million at the previous evaluation. However, based on annualized investments and grants to deposits, the bank ranked last out of four when compared to similarly situated banks that primarily served this assessment area. The bank’s performance was primarily driven by prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 40380 (Rochester, NY) Qualified Investments and Grants January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	12	42,619	1	3,293	0	0	0	0	13	45,912
2020	1	10,522	0	0	0	0	0	0	1	10,522
2021	0	0	0	0	0	0	0	0	0	0
<b>Total Investments</b>	<b>13</b>	<b>53,141</b>	<b>1</b>	<b>3,293</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>14</b>	<b>56,434</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>90</b>	<b>839</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>90</b>	<b>839</b>
<b>Grand Total</b>	<b>13</b>	<b>53,141</b>	<b>91</b>	<b>4,132</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>104</b>	<b>57,273</b>

The following are examples of community development investments and grants that benefited this assessment area:

- In 2020, the bank made an investment for \$10.5 million, that was used to build properties that qualified for LIHTC. LIHTC is a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments, the bank supported affordable housing for LMI individuals.
- The bank’s \$839,000 in grants or donations were entirely comprised of funds to organizations that provided community services for LMI geographies or individuals.

### Responsiveness to Credit and Community Development Needs

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank made one new qualified investment, which promoted affordable housing efforts. Of the prior period investments, 92.3% also promoted affordable housing efforts, which was a community development need within this assessment area. Qualified grants promoted community services towards LMI individuals, which was also an identified community development need within this assessment area.



## **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives. The bank's new qualified investment was a LIHTC. The prior period investments also consisted of a mix of LIHTC and mortgage-backed securities.

## **SERVICE TEST**

M&T's performance was adequate in the service test for this assessment area. Delivery systems were reasonably accessible to essentially all portions of the assessment area. To the extent changes were made, the bank's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI census tracts or individuals. The bank provided an adequate level of community development services in this assessment area.

## **Retail Services**

### ***Accessibility of Delivery Systems***

Delivery systems were reasonably accessible to essentially all portions of the institution's assessment area, including LMI areas. M&T operated 27 full-service branches in this assessment area, of which 4 (14.8%) was in LMI census tracts. The bank maintained a total of 86 ATMs, 1 full-service ATM at 7 branch locations, 2 full-service ATMs at 20 branch locations, and 39 offsite ATMs, of which 25 (29.1%) were in LMI census tracts. The bank's percentage of branches was lower than both the percentage of LMI census tracts in this MSA (33.0%) and the percentage of the population residing in LMI census tracts (23.6%). The bank's ATM percentage was slightly lower than the percentage of LMI census tracts in this MSA, but higher than the percentage of the population residing in LMI census tracts.

### ***Changes in Branch Locations***

To the extent changes were made, the institution's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened, closed, or relocated during the evaluation period.

### ***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and individuals. Extended hours were offered in 24 (88.9%) branches, including 3 (75.0%) in LMI census tracts; 13 (48.1%) branches offered weekend hours, including 1 (25.0%) in a low-income census tract; and 21 (77.8%) branches, including 2 (50.0%) branches in LMI census tracts, offered drive-thru hours.

The bank's products and services in this assessment area were consistent with those discussed at the institution level.

## **Community Development Services**

M&T provided an adequate level of community development services in this assessment area. The bank conducted 56 services during the evaluation period that primarily addressed community services. This activity accounted for 3.5% of the bank's total number of community development services activity. On an

annualized basis over 24 months, this represented a decrease as the bank made 28.0 community development services, compared to the previous evaluation’s annualized performance of 222.5 community development services. The bank had 231 service hours during the evaluation period, which on an annualized basis was 115.5 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 40380 (Rochester, NY) Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	0	10	2	0	<b>12</b>
2021	0	33	11	0	<b>44</b>
<b>Total</b>	<b>0</b>	<b>43</b>	<b>13</b>	<b>0</b>	<b>56</b>

The following are examples of community development services that benefited this assessment area:

- From 2020 to 2021, 11 employees, including bank management, had 45 instances of serving on the board of organizations dedicated to providing various services to LMI individuals. The organizations provided financial literacy, work-readiness, youth development, and other services to LMI populations within the assessment area.
- From 2020 to 2021, two bank employees had five instances of assisting various community service organizations by providing financial education. The organizations provided a variety of services including financial literacy services and home counseling services to disadvantaged LMI individuals.

## METROPOLITAN AREA MSA 13780 (BINGHAMTON, NY) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 11 of its 664 locations and 28 of its 1,882 ATMs in this assessment area. These branches generated \$1.9 billion in deposits which accounted for 1.5% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 1.7% by number and 0.9% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the southern portion of Upstate New York, the assessment area consisted of the entire MSA, which was comprised of Broome and Tioga Counties, with the city of Binghamton as the principal city in the region.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 13780 (Binghamton, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	7	10.8%	2.7%	21.6%
Moderate Income	10	15.4%	9.3%	16.9%
Middle Income	34	52.3%	60.1%	21.6%
Upper Income	14	21.5%	27.9%	39.9%
Unknown	0	0	0	0
<b>Total</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 13780 (Binghamton, NY)	Consistent	Consistent	Below

M&T's lending test performance in this assessment area was consistent with the New York State performance, as lending activity, geographic distribution, and borrower distribution was good. The bank made a total of 12 community development loans for \$87.9 million during the evaluation period.

Investment test performance was consistent with the New York State performance. The bank had a total of 9 investments totaling \$30.4 million consisting of 1 new investment for \$12.6 million and 8 prior period investments totaling \$17.8 million. The bank also made 43 grants and donations totaling \$255,000.

Service test performance was below the New York State performance. The bank operated 3 (27.3%) of its branches and 10 (35.7%) ATMs in the assessment area in LMI census tracts. The bank had 19 instances, totaling 116 hours of community development services in this assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 21300 (ELMIRA, NY) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated one of its 664 locations and 1 of its 1,882 ATMs in this assessment area. This branch generated \$29.5 million in deposits which accounted for 0.02% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.1% by number and 0.1% by dollar volume of the bank’s combined total lending activity from January 1, 2019 to December 31, 2021.

Located in the southern tier of New York State, the assessment area consisted of the entire MSA, which was comprised of Chemung County.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 21300 (Elmira, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	4	18.2%	4.7%	22.9%
Moderate Income	3	13.6%	8.5%	16.0%
Middle Income	11	50.0%	56.3%	21.0%
Upper Income	3	13.6%	30.6%	40.0%
Unknown	1	4.5%	0	0
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 21300 (Elmira, NY)	Below	Below	Below

M&T’s lending test performance in this assessment area was below the New York State performance, as lending activity was adequate, geographic distribution was poor, and borrower distribution was good. The bank made one community development loan for \$4.5 million during the evaluation period.

Investment test performance was below the New York State performance. The bank did not have any investments in this assessment area. The bank made two grants and donations totaling \$12,000.

Service test performance was below the New York State performance. The bank’s one branch and ATM was located in a middle-income census tract. In addition, the bank had 5 instances, totaling 10 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 27060 (ITHACA, NY) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 2 of its 664 locations and 6 of its 1,882 ATMs in this assessment area. These branches generated \$268.4 million in deposits which accounted for 0.2% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.3% by number and 0.4% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in central New York State, the assessment area consisted of the entire MSA, which was comprised of Tompkins County, with the city of Ithaca as the principal city in the region.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 27060 (Ithaca, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	#	%		
Low Income	0	0	0	21.0
Moderate Income	4	17.4	12.2	16.7
Middle Income	12	52.2	70.6	21.2
Upper Income	6	26.1	17.0	41.0
Unknown	1	4.3	0.2	0
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 27060 (Ithaca, NY)	Below	Below	Below

M&T’s lending test performance in this assessment area was below the New York State performance, as lending activity was adequate, geographic distribution was adequate, and borrower distribution was good. The bank made 1 community development loan for \$8.1 million during the evaluation period.

Investment test performance was below the New York State performance. The bank had a total of 3 investments totaling \$18.2 million consisting of 2 new investments for \$15.5 million and 1 prior period investment totaling \$2.7 million. The bank also made 8 grants and donations totaling \$45,000.

Service test performance was below the New York State performance. The bank operated none of its branches and 1 (16.7%) ATM in the assessment area in a moderate-income census tract. In addition, the bank had 11 instances, totaling 32 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 28740 (KINGSTON, NY) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 5 of its 664 locations and 8 of its 1,882 ATMs in this assessment area. These branches generated \$495.0 million in deposits which accounted for 0.4% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.8% by number and 0.4% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the Hudson Valley of New York State, the assessment area consisted of the entire MSA, which was comprised of Ulster County.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 28740 (Kingston, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	1	2.1%	1.8%	21.9%
Moderate Income	7	14.9%	7.1%	16.9%
Middle Income	27	57.4%	59.0%	20.1%
Upper Income	12	25.5%	32.0%	41.0%
Unknown	0	0	0	0
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 28740 (Kingston, NY)	Consistent	Below	Below

M&T’s lending test performance in this assessment area was consistent with the New York State performance, as lending activity was adequate, geographic distribution was good, and borrower distribution was good. The bank made one community development loan for \$4.0 million during the evaluation period.

Investment test performance was below the New York State performance. The bank did not have any investments in this assessment area. The bank made 14 grants and donations totaling \$66,000.

Service test performance was below the New York State performance. The bank operated one (20.0%) of its branches and one (12.5%) ATM in the assessment area in a moderate-income census tract. The bank had one instance, totaling one hour of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 39100 (POUGHKEEPSIE-NEWBURGH- MIDDLETOWN, NY) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 18 of its 664 locations and 23 of its 1,882 ATMs in this assessment area. These branches generated \$1.6 billion in deposits which accounted for 1.2% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 2.7% by number and 2.2% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the Hudson Valley of New York State, the assessment area consisted of the entire MSA, which was comprised of Dutchess and Orange Counties.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)</b>				
<b>Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	14	8.9%	2.6%	21.5%
Moderate Income	23	14.6%	10.9%	16.5%
Middle Income	78	49.4%	53.3%	20.9%
Upper Income	41	25.9%	33.1%	41.0%
Unknown	2	1.3%	0	0
<b>Total</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	Consistent	Consistent	Below

M&T's lending test performance in this assessment area was consistent with the New York State performance, as lending activity, geographic distribution, and borrower distribution was good. The bank made a total of 24 community development loans for \$64.5 million during the evaluation period.

Investment test performance was consistent with the New York State performance. The bank had a total of 11 investments totaling \$26.7 million consisting of all prior period investments. The bank also made 59 grants and donations totaling \$342,000.

Service test performance was below the New York State performance. The bank operated six (33.3%) of its branches and six (26.1%) ATMs in the assessment area in LMI census tracts. In addition, the bank had five instances, totaling 75 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 45060 (SYRACUSE, NY) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 27 of its 664 locations and 45 of its 1,882 ATMs in this assessment area. These branches generated \$4.2 billion in deposits which accounted for 3.2% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 3.5% by number and 2.9% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the northern portion of Upstate New York, the assessment area consisted of the partial MSA, which was comprised of Madison and Onondaga counties, with the city of Syracuse as the principal city in the region.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 45060 (Syracuse, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	23	14.7%	3.2%	20.7%
Moderate Income	24	15.4%	10.3%	16.6%
Middle Income	58	37.2%	47.3%	20.2%
Upper Income	46	29.5%	39.1%	42.5%
Unknown	5	3.2%	0.1%	0
<b>Total</b>	<b>156</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 45060 (Syracuse, NY)	Consistent	Consistent	Below

M&T’s lending test performance in this assessment area was consistent with the New York State performance, as lending activity, geographic distribution, and borrower distribution was good. The bank made a total of 20 community development loans for \$51.9 million during the evaluation period.

Investment test performance was consistent with the New York State performance. The bank had a total of seven investments totaling \$32.3 million consisting of one new investment for \$13.0 million and six prior period investments totaling \$19.3 million. The bank also made 66 grants and donations totaling \$764,000.

Service test performance was below the New York State performance. The bank operated four (14.8%) of its branches and six (13.3%) ATMs in the assessment area in LMI census tracts. In addition, the bank had 15 instances, totaling 98 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.



## METROPOLITAN AREA MSA 46540 (UTICA-ROME, NY) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 11 of its 664 locations and 24 of its 1,882 ATMs in this assessment area. These branches generated \$903.1 million in deposits which accounted for 0.7% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 1.2% by number and 0.7% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the central portion of Upstate New York, the assessment area consisted of the entire MSA, which was comprised of Herkimer and Oneida counties, with the cities of Utica and Rome as the principal cities in the region.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 46540 (Utica-Rome, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	14	15.1%	5.0%	22.0%
Moderate Income	10	10.8%	7.2%	16.9%
Middle Income	45	48.4%	60.0%	21.5%
Upper Income	18	19.4%	27.8%	39.6%
Unknown	6	6.5%	0	0
<b>Total</b>	<b>93</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 46540 (Utica-Rome, NY)	Consistent	Below	Below

M&T’s lending test performance in this assessment area was consistent with the New York State performance, as lending activity, geographic distribution, and borrower distribution was good. The bank made a total of 6 community development loans for \$13.9 million during the evaluation period.

Investment test performance was below the New York State performance. The bank had 1 investment totaling \$255,000 which was a prior period investment. The bank also made 13 grants and donations totaling \$97,000.

Service test performance was below the New York State performance. The bank operated one (9.1%) of its branches and one (4.2%) ATM in the assessment area in low-income census tract. In addition, the bank had 7 instances, totaling 13 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 48060 (WATERTOWN-FT. DRUM, NY) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION’S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T did not have any branches or ATMs in this assessment area, as the only branch was closed in 2020. Additionally, the bank did not have any deposits as of 2021. As of June 30, 2020, this area generated \$31.9 million in deposits which accounted for 0.03% of the bank’s total branch deposits. This assessment area generated approximately 0.1% by number and 0.1% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the northern portion of Upstate New York, the assessment area consisted of the entire MSA, which was comprised of Jefferson County, with the city of Watertown as the principal city in the region.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 48060 (Watertown-Ft. Drum, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0	0	19.8%
Moderate Income	5	19.2%	7.9%	18.3%
Middle Income	17	65.4%	83.2%	22.4%
Upper Income	2	7.7%	8.9%	39.5%
Unknown	2	7.7%	0	0
<b>Total</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 48060 (Watertown-Ft. Drum, NY)	Below	Below	Below

M&T’s lending test performance in this assessment area was below the New York State performance, as lending activity was adequate, and geographic distribution, and borrower distribution was good. The bank did not make any community development loans during the evaluation period.

Investment test performance was below the New York State performance. The bank had one investment totaling \$22.5 million, which was a prior period investment. The bank also made two grants and donations totaling \$10,000.

Service test performance was below the New York State performance. As of 2021, the bank did not operate any branches or ATMs in the assessment area. The bank did not have any community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## NON-METROPOLITAN AREA GROUP A, NEW YORK STATE – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 12 of its 664 locations and 42 of its 1,882 ATMs in this assessment area. These branches generated \$929.8 million in deposits which accounted for 0.7% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 2.3% by number and 1.2% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the southwest portion of Upstate New York, the assessment area consisted of Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, and Wyoming Counties.

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group A, New York State Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	3	2.4%	0.5%	21.7%
Moderate Income	11	8.7%	6.8%	18.8%
Middle Income	102	81.0%	87.7%	22.1%
Upper Income	7	5.6%	5.1%	37.4%
Unknown	3	2.4%	0	0
<b>Total</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group A, New York State	Below	Below	Below

M&T’s lending test performance in this assessment area was below the New York State performance, as lending activity and borrower distribution was good, and geographic distribution was adequate. The bank made a total of 3 community development loans for \$4.6 million during the evaluation period.

Investment test performance was below the New York State performance. The bank had a total of 13 investments totaling \$8.9 million consisting of all prior period investments. The bank also made 8 grants and donations totaling \$46,000.

Service test performance was below the New York State performance. The bank operated two (16.7%) of its branches and four (9.5%) ATMs in the assessment area in LMI census tracts. In addition, the bank had 11 instances, totaling 29 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## NON-METROPOLITAN AREA GROUP B, NEW YORK STATE – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 4 of its 664 locations and 6 of its 1,882 ATMs in this assessment area. These branches generated \$223.4 million in deposits which accounted for 0.2% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.6% by number and 0.3% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the finger lakes area of Upstate New York, the assessment area consisted of Cayuga, Chenango, Cortland, and Seneca Counties.

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group B, New York State Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	1	1.9%	0.7%	18.7%
Moderate Income	4	7.4%	5.0%	16.8%
Middle Income	39	72.2%	75.0%	22.2%
Upper Income	9	16.7%	19.3%	42.3%
Unknown	1	1.9%	0	0
<b>Total</b>	<b>54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group B, New York State	Below	Below	Below

M&T's lending test performance in this assessment area was below the New York State performance, as lending activity was adequate, and geographic distribution, and borrower distribution was good. The bank made a total of 2 community development loans for \$7.3 million during the evaluation period.

Investment test performance was below the New York State performance. The bank had a total of 4 investments totaling \$953,000 consisting of all prior period investments. The bank also made 8 grants and donations totaling \$20,000.

Service test performance was below the New York State performance. The bank operated one (25.0%) of its branches and two (33.3%) ATMs in the assessment area in a moderate-income census tract. In addition, the bank had 12 instances, totaling 19 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## NON-METROPOLITAN AREA GROUP C, NEW YORK STATE – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 2 of its 664 locations and 3 of its 1,882 ATMs in this assessment area. These branches generated \$111.6 million in deposits which accounted for 0.1% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.1% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in the southeast portion of Upstate New York, the assessment area consisted of Sullivan County.

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group C, New York State Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0	0	20.5%
Moderate Income	4	16.7%	13.2%	16.5%
Middle Income	17	70.8%	67.2%	21.3%
Upper Income	3	12.5%	19.6%	41.7%
Unknown	0	0	0	0
<b>Total</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group C, New York State	Below	Below	Below

M&T's lending test performance in this assessment area was below the New York State performance, as lending activity and geographic distribution was adequate, and borrower distribution was good. The bank made a total of 2 community development loans for \$9.3 million during the evaluation period.

Investment test performance was below the New York State performance. The bank had a total of 4 investments totaling \$11.1 million consisting of all prior period investments. The bank also made 6 grants and donations totaling \$17,000.

Service test performance was below the New York State performance. None of the bank's branches or ATMs in the assessment area were in LMI census tracts. The bank did not have any community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## COMMONWEALTH OF PENNSYLVANIA

### CRA RATING FOR PENNSYLVANIA: SATISFACTORY

*The Lending Test is rated: High Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: Low Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- The bank exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- The bank made a relatively high level of community development loans.
- The bank used innovative and/or flexible lending practices in serving assessment area credit needs.

#### INVESTMENT TEST

- The bank had an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those not routinely provided by private investors.
- The bank exhibited adequate responsiveness to credit and community development needs.
- The bank occasionally used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were accessible to essentially all portions of the bank's geographies and individuals of different income levels in its assessment area.
- The bank's record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced portions of its assessment area, particularly LMI geographies and/or LMI individuals.
- The bank provided an adequate level of community development services.

## SCOPE OF EXAMINATION

Examiners conducted full-scope reviews of the following two assessment areas in the state of Pennsylvania:

1. MSA 25420 (Harrisburg-Carlisle, PA)
2. MSA 49620 (York-Hanover, PA)

In order to derive the state rating, the full-scope assessment areas were weighted based on the proportion of loan originations, deposits, and branches in each area. M&T's combined full-scope areas made up 33.5% by number and 37.0% by dollar volume of the total lending activity; 42.3% of the deposits; 32.4% of the branches and 45.8% of the ATMs in the Commonwealth of Pennsylvania rated area.

Additionally, limited-scope reviews were conducted in the remaining Pennsylvania assessment areas:

1. MSA 11020 (Altoona, PA)
2. MSA 14100 (Bloomsburg-Berwick, PA)
3. MSA 16540 (Chambersburg-Waynesboro, PA)
4. MSA 20700 (East Stroudsburg, PA)
5. MSA 23900 (Gettysburg, PA)
6. MSA 29540 (Lancaster, PA)
7. MSA 30140 (Lebanon, PA)
8. MSA 39740 (Reading, PA)
9. MSA 42540 (Scranton-Wilkes Barre, PA)
10. MSA 44300 (State College, PA)
11. MSA 48700 (Williamsport, PA)
12. Non-MSA Group A (Bradford and Sullivan counties)
13. Non-MSA Group B (Northumberland, Schuylkill, Snyder, and Union counties)
14. Non-MSA Group C (Bedford and partial Huntingdon counties)
15. Non-MSA Group D (Clearfield and Clinton counties)

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 111 of its 664 locations and 354 of its 1,882 ATMs in the Commonwealth of Pennsylvania rated area, not including branches or ATMs in any multistate assessment areas. This rated area generated approximately 11.3% by number and 7.5% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. According to the June 30, 2021 FDIC Summary of Deposit Report, M&T held approximately \$12.3 billion in deposits in the Pennsylvania rated area, which accounted for 9.5% of the bank's total deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COMMONWEALTH OF PENNSYLVANIA

### LENDING TEST

M&T's Lending Test performance in Pennsylvania is rated High Satisfactory. Lending levels reflected good responsiveness to assessment area credit needs. The geographic distribution of loans reflected good penetration throughout the assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of low-income individuals and areas and very

small businesses. The bank made a relatively high level of community development loans. The bank used innovative and/or flexible lending practices in serving assessment area credit needs.

### Lending Activity

M&T's lending activity demonstrated good responsiveness to the retail credit needs of the assessment areas in this state. This conclusion was primarily based on the bank making a good responsiveness in the MSA 25420 (Harrisburg-Carlisle, PA) and MSA 49620 (York-Hanover, PA) assessment areas.

The bank's lending in this state is summarized in the table below.

<b>Summary of Lending Activity in State of Pennsylvania January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	1,639	19.2%	111,240	7.9%
Home Purchase	2,181	25.5%	374,821	26.5%
Loan Purpose Not Applicable	445	5.2%	52,528	3.7%
Multi-Family	70	0.8%	327,722	23.1%
Refinancing	4,219	49.3%	549,648	38.8%
<b>Total HMDA</b>	<b>8,554</b>	<b>45.1%</b>	<b>1,415,959</b>	<b>57.9%</b>
<b>Total Small Business</b>	<b>10,356</b>	<b>54.6%</b>	<b>1,018,347</b>	<b>41.6%</b>
<b>Total Small Farm</b>	<b>45</b>	<b>0.2%</b>	<b>12,914</b>	<b>0.5%</b>
<b>TOTAL LOANS</b>	<b>18,955</b>	<b>100.0%</b>	<b>2,447,220</b>	<b>100.0%</b>

### Geographic Distribution

The geographic distribution of loans reflected good penetration within Pennsylvania. Examiners based this conclusion on the distribution of loans in the LMI census tracts. The performance under the geographic distribution criterion was generally consistent for the assessment areas within the rated area. For details, please refer to the Geographic Distribution of Loans section for each full-scope assessment area.

### Borrower Distribution

The borrower distribution reflected, given the product lines offered by the institution, good penetration among retail customers of different income levels and among business customers of different sizes throughout Pennsylvania. Examiners based this conclusion on the percentage of loans to LMI borrowers. The performance under the Borrower Distribution criterion was generally consistent for the assessment areas within the rated area. For details, please refer to the Borrower Distribution section for each full-scope assessment area.

### Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment areas in Pennsylvania, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.



### Community Development Lending

M&T made a relatively high level of community development loans in the commonwealth of Pennsylvania. This conclusion was primarily based on the bank making a relatively high level of community development loans in the MSA 25420 (Harrisburg-Carlisle, PA) assessment area and being a leader in making community development loans in the MSA 49620 (York-Hanover, PA) assessment area. The community development lending in the Pennsylvania rated area represented 4.8% of the bank's total dollar volume of community development lending.

The bank originated 40 qualified community development loans totaling approximately \$188.1 million across the Pennsylvania rated area, representing an overall annualized performance of 20 loans for \$94.1 million. Included in the bank's community development lending were 30 PPP loans in amounts greater than \$1 million with a primary purpose of revitalization and stabilization, totaling approximately \$61.8 million.

The bank's community development lending activity by assessment area for each community development purpose is summarized in the table below.

<b>Commonwealth of Pennsylvania Rated Area Community Development Lending January 1, 2020 to December 31, 2021</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
MSA 11020 (Altoona, PA)	0	0	1	100	0	0	3	5,500	4	5,600
MSA 14100 (Bloomsburg-Berwick, PA)	0	0	0	0	0	0	0	0	0	0
MSA 16540 (Chambersburg-Waynesboro, PA)	0	0	1	2,500	0	0	2	2,427	3	4,927
MSA 20700 (East Stroudsburg, PA)	0	0	0	0	0	0	0	0	0	0
MSA 23900 (Gettysburg, PA)	0	0	0	0	0	0	0	0	0	0
MSA 25420 (Harrisburg-Carlisle, PA)	0	0	2	40,000	0	0	4	6,909	6	46,909
MSA 29540 (Lancaster, PA)	0	0	0	0	0	0	2	2,717	2	2,717
MSA 30140 (Lebanon, PA)	0	0	0	0	0	0	1	2,000	1	2,000
MSA 39740 (Reading, PA)	0	0	0	0	0	0	0	0	0	0
MSA 42540 (Scranton-Wilkes-Barre, PA)	0	0	0	0	0	0	5	8,546	5	8,546
MSA 44300 (State College, PA)	0	0	0	0	0	0	0	0	0	0
MSA 48700 (Williamsport, PA)	0	0	0	0	0	0	2	4,980	2	4,980

MSA 49620 (York-Hanover, PA)	1	723	3	78,500	1	1,036	5	15,473	10	95,732
BSRA	0	0	0	0	0	0	5	11,962	5	11,962
Non-MSA Group A	0	0	0	0	0	0	0	0	0	0
Non-MSA Group B	0	0	0	0	0	0	2	4,743	2	4,743
Non-MSA Group C	0	0	0	0	0	0	0	0	0	0
Non-MSA Group D	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>723</b>	<b>7</b>	<b>121,100</b>	<b>1</b>	<b>1,036</b>	<b>31</b>	<b>65,257</b>	<b>40</b>	<b>188,116</b>

### Innovative and/or Flexible Lending Practices

The institution used innovative and/or flexible lending practices in order to serve assessment area credit needs in this commonwealth. The bank's products and services in Pennsylvania were consistent with those discussed at the institution level.

### INVESTMENT TEST

M&T's performance under the Investment Test in Pennsylvania is rated Low Satisfactory. The bank had an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those not routinely provided by private investors. The bank exhibited adequate responsiveness to credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

M&T had an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. During the current evaluation period, the bank made 562 qualified community development investments and grants totaling approximately \$86.6 million, which included 50 investments totaling \$82.3 million and 512 grants totaling \$4.3 million. For investments, this activity represented an overall annualized performance over 24 months of 25 investments totaling \$41.1 million. The annualized performance for grants included 256 grants totaling \$2.2 million.

The institution's qualified investments and grants by assessment area and community development purpose are summarized in the table below.

Commonwealth of Pennsylvania Rated Area Community Development Investments and Grants January 1, 2020 to December 31, 2021										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
MSA 11020 (Altoona, PA)	3	422	0	0	0	0	0	0	3	422
MSA 14100 (Bloomsburg-Berwick, PA)	0	0	0	0	0	0	0	0	0	0
MSA 16540	3	12,723	0	0	0	0	0	0	3	12,723

(Chambersburg-Waynesboro, PA)										
MSA 20700 (East Stroudsburg, PA)	0	0	0	0	0	0	0	0	0	0
MSA 23900 (Gettysburg, PA)	0	0	0	0	0	0	0	0	0	0
MSA 25420 (Harrisburg-Carlisle, PA)	13	10,017	0	0	0	0	0	0	13	10,017
MSA 29540 (Lancaster, PA)	2	6,685	0	0	0	0	0	0	2	6,685
MSA 30140 (Lebanon, PA)	1	0	0	0	0	0	0	0	1	0
MSA 39740 (Reading, PA)	4	891	1	4,627	0	0	0	0	5	5,518
MSA 42540 (Scranton-Wilkes-Barre, PA)	6	9,338	0	0	0	0	0	0	6	9,338
MSA 44300 (State College, PA)	2	4,133	0	0	0	0	0	0	2	4,133
MSA 48700 (Williamsport, PA)	1	8,323	0	0	0	0	0	0	1	8,323
MSA 49620 (York-Hanover, PA)	11	6,213	0	0	0	0	0	0	9	5,947
BSRA	1	461	0	0	0	0	0	0	1	461
Non-MSA Group A	2	18,455	0	0	0	0	0	0	2	18,455
Non-MSA Group B	0	0	0	0	0	0	0	0	0	0
Non-MSA Group C	0	0	0	0	0	0	0	0	0	0
Non-MSA Group D	0	0	0	0	0	0	0	0	0	0
<b>Investments Total</b>	49	77,661	1	4,627	0	0	0	0	50	82,288
<b>Grants Total</b>	0	0	512	4,312	0	0	0	0	512	4,312
<b>Grand Total</b>	49	77,661	513	8,939	0	0	0	0	562	86,600

### Responsiveness to Credit and Community Development Needs

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank's qualified investments all promoted affordable housing efforts, which is a community development need within these assessment areas. Qualified grants all promoted community services towards LMI individuals.

### Community Development Initiatives

The bank occasionally used innovative and/or complex investments to support community development initiatives.

### SERVICE TEST

M&T's performance under the Service Test in Pennsylvania is rated Low Satisfactory. Delivery systems were accessible to essentially all portions of the institution's assessment area. The bank's record of opening

and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or LMI individuals. The bank provided an adequate level of community development services.

## **Retail Services**

### ***Accessibility of Delivery Systems***

Delivery systems were accessible to essentially all portions of the bank’s assessment areas in Pennsylvania. Examiners based this conclusion primarily on the bank’s performance within the MSA 25420 (Harrisburg-Carlisle, PA) assessment area, where 14.4% of the bank’s branches and 13.3% of ATMs in were located; and the MSA 49620 (York-Hanover, PA) assessment area, where 18.0% of the bank’s branches and 32.5% of ATMs were located.

### ***Changes in Branch Locations***

To the extent changes were made, the bank’s opening and closing of branches did not generally adversely affect its accessibility of delivery systems, particularly in LMI areas. While M&T closed 15 branches throughout the Pennsylvania assessment areas, only one was in an LMI census tract.

### ***Reasonableness of Business Hours and Services***

M&T’s business hours and services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI tracts and/or individuals.

Overall, the bank’s products and services in the Pennsylvania assessment areas were consistent with those discussed at the institution level.

## **Community Development Services**

M&T provided an adequate level of community development services in its assessment areas in Pennsylvania. The bank conducted 132 qualified community service events, which represented an overall annualized performance over 24 months of 66 services. The bank’s qualified community development services consisted of a wide variety of events related to financial education, technical assistance, and first-time homebuyer seminars.

The institution’s community development services by assessment area and community development purpose are summarized in the table below.

<b>Commonwealth of Pennsylvania Rated Area Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
MSA 11020 (Altoona, PA)	0	0	0	0	<b>0</b>
MSA 14100 (Bloomsburg-Berwick, PA)	0	0	0	0	<b>0</b>

MSA 16540 (Chambersburg-Waynesboro, PA)	0	0	0	1	<b>1</b>
MSA 20700 (East Stroudsburg, PA)	0	0	0	0	<b>0</b>
MSA 23900 (Gettysburg, PA)	0	0	0	0	<b>0</b>
MSA 25420 (Harrisburg-Carlisle, PA)	0	7	1	0	<b>8</b>
MSA 29540 (Lancaster, PA)	0	9	2	0	<b>11</b>
MSA 30140 (Lebanon, PA)	0	0	0	0	<b>0</b>
MSA 39740 (Reading, PA)	0	16	0	0	<b>16</b>
MSA 42540 (Scranton-Wilkes-Barre, PA)	0	9	36	0	<b>45</b>
MSA 44300 (State College, PA)	1	6	0	0	<b>7</b>
MSA 48700 (Williamsport, PA)	0	0	0	0	<b>0</b>
MSA 49620 (York-Hanover, PA)	0	37	0	0	<b>37</b>
BSRA	0	0	0	0	<b>0</b>
PA Non-MSA Group A	0	0	0	0	<b>0</b>
PA Non-MSA Group B	0	4	1	0	<b>5</b>
PA Non-MSA Group C	0	0	0	0	<b>0</b>
PA Non-MSA Group D	0	0	2	0	<b>2</b>
<b>Services Total</b>	<b>1</b>	<b>88</b>	<b>42</b>	<b>1</b>	<b>132</b>

## METROPOLITAN AREA MSA 25420 (HARRISBURG-CARLISLE, PA)-- FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank's performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 16 of its 664 locations and 47 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 25 institutions operated 142 offices within this assessment area. M&T ranked 2<sup>nd</sup> with approximately \$2.6 billion in deposits, which represented 13.3% of the deposit market share and accounted for 2.0% of the bank's total branch deposits. This assessment area generated approximately 1.3% by number and 1.0% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large institutions, such as PNC Bank and Wells Fargo, as well as regional banks such as First National Bank of Pennsylvania and Mid Penn Bank.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The MSA 25420 (Harrisburg-Carlisle, PA) assessment area included Cumberland County and Dauphin County. According to the 2015 ACS, the population of this assessment area was 512,521. The assessment area consisted of 114 census tracts, of which 11 or 9.6% were low-income, 26 or 22.8% were moderate-income, 52 or 45.6% were middle-income, 23 or 20.2% were upper-income, and two or 1.8% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 25420 (Harrisburg-Carlisle, PA) assessment area had 131,488 families, of which 19.8% were low-income (7.6% of which were below the poverty level), 18.0% were moderate-income, 21.7% were middle-income, and 40.6% were upper-income.

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

<b>MSA 25420 (Harrisburg-Carlisle, PA) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$78,785	\$83,352	5.8%
Cumberland County, PA	\$84,947	\$89,867	5.8%
Dauphin County, PA	\$74,029	\$80,304	8.5%

MSA 25420 (Harrisburg-Carlisle, PA)	\$78,363	\$84,347	7.6%
Commonwealth of Pennsylvania	\$74,468	\$80,996	8.8%
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### Housing Characteristics

Based on the 2015 ACS data, the MSA 25420 (Harrisburg-Carlisle, PA) assessment area had 223,592 housing units, of which 61.5% were owner-occupied, 30.5% were rental, and 8.1% were vacant. Of the total housing units, 7.3% were located in low-income census tracts, 18.7% in moderate-income census tracts, 50.8% in middle-income census tracts, and 23.2% in upper-income census tracts. In low-income census tracts, 24.7% of housing units were owner-occupied, 55.8% were rental units, and 19.5% were vacant. In moderate-income census tracts, 42.2% of housing units were owner-occupied, 45.4% were rental units, and 12.4% were vacant.

The median age of housing stock in this assessment area was 50 years old, with 25.8% 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 2015 ACS, the median housing value in this assessment area was \$171,898 with an affordability ratio of 33.6. The median gross rent in the assessment area was \$863 per month.

MSA 25420 (Harrisburg-Carlisle, PA) Housing Characteristics			
Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$171,898	33.6	\$863
Cumberland County, PA	\$188,400	32.8	\$886
Dauphin County, PA	\$159,200	33.8	\$847
MSA 25420 (Harrisburg-Carlisle, PA)	\$170,729	33.6	\$856
Commonwealth of Pennsylvania	\$166,000	32.3	\$840
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey.</i>			

### Housing Cost Burden

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 39.2% of all rental households had rental costs that exceeded 30% of their incomes, 76.3% of low-income rental households had rental costs that exceeded 30% of their income, and 28.8% 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, 61.3% of low-income homeowners had housing costs that exceeded 30% of their income, and 29.4% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

MSA 25420 (Harrisburg-Carlisle, PA) Housing Cost Burden*						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners

Assessment Area	76.3%	28.8%	39.2%	61.3%	29.4%	17.4%
Cumberland County, PA	80.7%	31.7%	38.9%	61.0%	27.8%	16.5%
Dauphin County, PA	73.6%	26.8%	39.4%	61.6%	30.8%	18.3%
MSA 25420 (Harrisburg-Carlisle, PA)	75.7%	27.4%	38.8%	60.7%	29.1%	17.6%
Commonwealth of Pennsylvania	72.3%	31.7%	42.0%	61.5%	28.9%	19.6%
*Cost Burden is housing cost that equals 30% or more of household income Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 24,543 businesses operating in this assessment area in 2021, of which 5.7% were located in low-income census tracts and 17.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 90.0% were small businesses with a GAR of \$1 million or less, of which 5.7% were located in low-income census tracts and 17.1% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.8% in 2019, increased to 7.8% in 2020, and decreased to 5.5% in 2021. The state of Pennsylvania had an unemployment rate of 4.5% in 2019, increased to 9.1% in 2020, and decreased to 6.3% in 2021.

MSA 25420 (Harrisburg-Carlisle, PA) Unemployment Rates			
Area	2019	2020	2021
Assessment Area	3.8%	7.8%	5.5%
Cumberland County, PA	3.5%	6.6%	4.6%
Dauphin County, PA	4.1%	8.9%	6.3%
MSA 25420 (Harrisburg-Carlisle, PA)	3.8%	7.7%	5.4%
Commonwealth of Pennsylvania	4.5%	9.1%	6.3%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

Additional performance context data for this assessment area is provided in the following MSA 25420 (Harrisburg-Carlisle, PA) Assessment Area Demographics Table:

MSA 25420 (Harrisburg-Carlisle, PA) Assessment Area Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	9.6	7,137	5.4	2,432	34.1	25,972	19.8
Moderate-income	26	22.8	19,833	15.1	2,664	13.4	23,680	18.0
Middle-income	52	45.6	69,162	52.6	3,994	5.8	28,484	21.7
Upper-income	23	20.2	35,344	26.9	922	2.6	53,352	40.6
Unknown-income	2	1.8	12	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>114</b>	<b>100.0</b>	<b>131,488</b>	<b>100.0</b>	<b>10,012</b>	<b>7.6</b>	<b>131,488</b>	<b>100.0</b>
	<b>Housing Units by</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	



	Tract	#	%	%	#	%	#	%
Low-income	16,411	4,056	3.0	24.7	9,154	55.8	3,201	19.5
Moderate-income	41,791	17,645	12.8	42.2	18,966	45.4	5,180	12.4
Middle-income	113,565	75,320	54.8	66.3	30,628	27.0	7,617	6.7
Upper-income	51,813	40,375	29.4	77.9	9,417	18.2	2,021	3.9
Unknown-income	12	3	0.0	25.0	9	75.0	0	0.0
<b>Total Assessment Area</b>	<b>223,592</b>	<b>137,399</b>	<b>100.0</b>	<b>61.5</b>	<b>68,174</b>	<b>30.5</b>	<b>18,019</b>	<b>8.1</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,391	5.7	1,261	5.7	109	5.3	21	5.0
Moderate-income	4,371	17.8	3,773	17.1	422	20.7	176	41.7
Middle-income	12,922	52.7	11,617	52.6	1,133	55.6	172	40.8
Upper-income	5,854	23.9	5,427	24.6	374	18.4	53	12.6
Unknown-income	5	0.0	5	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>24,543</b>	<b>100.0</b>	<b>22,083</b>	<b>100.0</b>	<b>2,038</b>	<b>100.0</b>	<b>422</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>90.0</b>		<b>8.3</b>		<b>1.7</b>
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	6	1.5	5	1.3	1	10.0	0	0.0
Moderate-income	9	2.2	9	2.3	0	0.0	0	0.0
Middle-income	298	73.0	289	72.6	9	90.0	0	0.0
Upper-income	95	23.3	95	23.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>408</b>	<b>100.0</b>	<b>398</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.5</b>		<b>2.5</b>		<b>.0</b>

2021 FFIEC Census Data and 2021 Dun and Bradstreet Information

## Community Contact

Examiners conducted a community contact interview with one community organization that serves this assessment area. The contact was held with a community organization that provided affordable housing and advocated for the poorest individuals and families in Cumberland County. The contact explained there is a shortage of affordable housing in the area. In July 2023, there were 254 households in need of housing and living in deplorable conditions. Cumberland County grew in population by 10.3% because of the high number of warehouses in the area, but there is not enough affordable housing to support the growth. Another contributing factor is that institutional investors have been buying all the available homes in the price range of starter homes, limiting the housing stock for potential first-time homebuyers. The organization believes the housing market needs a review, and changes need to be made to make it easier for developers to build affordable housing. The contact also stated reasonable rent controls need to be developed and affordable rental units need to be made available, zoning needs to be more flexible, and regulatory agencies need to modernize their approaches.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 25420  
(HARRISBURG-CARLISLE, PA)**

**LENDING TEST**

M&T’s performance was good in the lending test for this assessment area. The bank’s lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank made a relatively high level of community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

**Lending Activity**

M&T’s lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. M&T had a large portion of the market share of deposits during the evaluation period. While the bank’s HMDA market share slightly decreased, the bank’s small business lending market share was good as M&T ranked in the top ten throughout the evaluation period.

In 2021, the bank ranked 2<sup>nd</sup> out of 25 institutions with a deposit market share of 13.3%. In total HMDA lending, the bank ranked 27<sup>th</sup> out of 486 reporters with a market share of 1.1%, including market shares of 0.7% in home purchase lending, 1.1% in refinance, 2.8% in home improvement, and 2.5% in multifamily loans. M&T ranked 8<sup>th</sup> out of 112 reporters with a market share of 4.2% in small business lending.

In 2020, the bank ranked 2<sup>nd</sup> out of 24 institutions with a deposit market share of 12.4%. In total HMDA lending, the bank ranked 27<sup>th</sup> out of 457 reporters with a market share of 1.1%, including market shares of 0.9% in home purchase lending, 1.0% in refinance, 3.5% home improvement, and 4.6% in multifamily loans. M&T ranked 5<sup>th</sup> out of 135 reporters with a market share of 6.7% in small business lending.

In 2019, the bank ranked 2<sup>nd</sup> out of 24 institutions with a deposit market share of 10.2%. In total HMDA lending, the bank ranked 19<sup>th</sup> out of 396 reporters with a market share of 1.3%, including market shares of 0.6% in home purchase lending, 1.9% in refinance, 3.4% home improvement, and 4.9% in multifamily loans. M&T ranked 10<sup>th</sup> out of 92 reporters with a market share of 3.0% in small business lending.

<b>MSA 25420 (Harrisburg-Carlisle, PA)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	165	19.8%	12,566	7.6%
Home Purchase	214	25.6%	38,311	23.2%
Loan Purpose Not Applicable	58	6.9%	6,156	3.7%
Multi-Family	18	2.2%	58,220	35.2%
Refinancing	380	45.5%	50,017	30.3%
<b>Total HMDA</b>	<b>835</b>	<b>37.6%</b>	<b>165,270</b>	<b>50.4%</b>
<b>Total Small Business</b>	<b>1,383</b>	<b>62.2%</b>	<b>160,609</b>	<b>49.0%</b>
<b>Total Small Farms</b>	<b>4</b>	<b>0.2%</b>	<b>1,721</b>	<b>0.5%</b>
<b>TOTAL LOANS</b>	<b>2,222</b>	<b>100.0%</b>	<b>327,600</b>	<b>100.0%</b>

## Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 25420 (Harrisburg-Carlisle, PA) assessment area. Lending penetration in LMI tracts was excellent for home purchase, good for refinance, good for home improvement, good for multifamily, and good for small business loans.

### Gap Analysis

M&T demonstrated an excellent level of dispersion in LMI census tracts in this assessment area. In 2019, the bank's performance was at 90.9% and 84.6%, in LMI census tracts, respectively, and maintained the same level in 2020, while experiencing a slight decline in the moderate-income census tracts in 2021. Overall, performance in this assessment area showed improvement when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 25420 (Harrisburg-Carlisle, PA)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	11	1	90.9%
Moderate	26	4	84.6%
Middle	52	6	88.5%
Upper	23	0	100.0%
Income Unknown	2	2	0.0%
<b>2020</b>			
Low	11	1	90.9%
Moderate	26	4	84.6%
Middle	52	3	94.2%
Upper	23	0	100.0%
Income Unknown	2	2	0.0%
<b>2021</b>			
Low	11	1	90.9%
Moderate	26	5	80.8%
Middle	52	2	96.2%
Upper	23	0	100.0%
Income Unknown	2	2	0%

### Home Purchase Loans

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 7.9% by number and 5.7% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 3.0% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.2% by number and 2.3% by dollar in low-income census tracts. In 2021, the bank made 25.0% of home purchase loans by number and 16.2% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 12.8% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 14.5% by number and 9.1% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 8.6% by number and 4.5% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 3.0% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.4% by number and 2.0% by dollar in low-income census tracts. In 2020, the bank made 13.6% of home purchase loans by number and 11.1% by dollar in moderate-income census tracts. The bank's home purchase lending performance was similar to the 12.8% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 13.7% by number and 8.7% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 1.8% by number and 0.8% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was below the 3.0% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 2.9% by number and 1.7% by dollar in low-income census tracts. In 2019, the bank made 22.8% of home purchase loans by number and 12.5% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 12.8% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 14.0% by number and 8.9% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 2.0% by number and 1.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 3.0% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 1.8% by number and 1.1% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 10.9% by number and 8.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 12.8% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 8.9% by number and 5.7% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 3.9% by number and 2.7% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was above the 3.0% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.3% by number and 0.7% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 12.4% by number and 7.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 12.8% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 7.2% by number and 4.4% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 5.8% by number and 4.8% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly above the 3.0% of

owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.3% by number and 0.8% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 10.6% by number and 6.7% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 12.8% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 8.9% by number and 5.5% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area.

In 2021, the bank made 2.0% by number and 0.7% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 3.0% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 1.3% by number and 0.7% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 11.8% by number and 4.5% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was similar to the 12.8% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 9.9% by number and 6.5% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 1.9% by number and 1.9% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 3.0% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 1.3% by number and 1.1% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 3.8% by number and 1.1% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 12.8% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 8.7% by number and 5.3% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 1.6% by number and 1.3% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 3.0% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 1.6% by number and 1.4% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 13.1% by number and 11.7% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was similar to the 12.8% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 8.9% by number and 6.3% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected good penetration throughout the assessment area.

In 2021, the bank made 25.0% by number and 8.3% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 10.9% of multifamily housing units located in low-income census tracts and slightly above the aggregate, which made 20.2% by number and 5.1% by dollar of multifamily loans in low-income census tracts. In

2021, the bank made 50.0% by number and 36.7% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 29.4% of multifamily housing units located in moderate-income census tracts and above the aggregate, which made 36.8% by number and 33.4% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 66.7% by number and 61.1% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 10.9% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 20.0% by number and 4.6% by dollar of multifamily loans in low-income census tracts. In 2020, the bank made 16.7% by number and 9.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly below the 29.4% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 27.7% by number and 25.3% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank made 37.5% by number and 2.3% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 10.9% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 23.3% by number and 19.1% by dollar of multifamily loans in low-income census tracts. In 2019, the bank made 12.5% by number and 0.1% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly below the 29.4% of multifamily housing units located in moderate-income census tracts and significantly below the aggregate, which made 33.0% by number and 11.7% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 5.3% by number and 3.6% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 5.7% of businesses located in low-income census tracts and similar to the aggregate, which made 4.9% by number and 3.8% by dollar of small business loans in low-income census tracts. In 2021, the bank made 18.9% by number and 17.3% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 17.8% of businesses located in moderate-income census tracts and slightly above the aggregate, which made 16.2% by number and 17.0% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 5.9% by number and 3.8% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 5.7% of businesses located in low-income census tracts and above the aggregate, which made 4.6% by number and 3.8% by dollar of small business loans in low-income census tracts. In 2020, the bank made 21.0% by number and 25.0% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly above the 17.8% of businesses located in moderate-income census tracts and slightly above the aggregate, which made 17.0% by number and 17.8% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 4.8% by number and 1.9% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the

5.4% of businesses located in low-income census tracts and above the aggregate, which made 3.7% by number and 3.7% by dollar of small business loans in low-income census tracts. In 2019, the bank made 12.9% by number and 8.3% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was below the 18.0% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 15.8% by number and 15.5% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 17.1% by number and 13.7% by dollar to low-income borrowers and was slightly below the 19.8% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 11.0% by number and 6.7% by dollar to low-income families. The bank's lending to moderate-income borrowers was 28.9% by number and 27.1% by dollar, which was above the aggregate performance of 23.0% by number, above 18.2% by dollar, and significantly above the 18.0% moderate-income families in the assessment area.

In 2020, the bank made 21.0% by number and 15.0% by dollar to low-income borrowers and was similar to the 19.8% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 12.5% by number and 7.8% by dollar to low-income families. The bank's lending to moderate-income borrowers was 17.3% by number and 17.8% by dollar, which was below the aggregate performance of 25.0% by number, slightly below 20.3% by dollar, and similar to the 18.0% moderate-income families in the assessment area.

In 2019, the bank made 19.3% by number and 10.7% by dollar to low-income borrowers and was similar to the 19.8% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 10.2% by number and 6.1% by dollar to low-income families. The bank's lending to moderate-income borrowers was 33.3% by number and 28.9% by dollar, which was above the aggregate performance of 25.9% by number, above 20.5% by dollar, and significantly above the 18.0% moderate-income families in the assessment area.

#### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 16.3% by number and 9.4% by dollar and was significantly above the aggregate lending data, at 6.8% by number and 4.1% by dollar. The bank's performance was slightly below the 19.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 33.3% by number and 26.9% by dollar, was significantly above the aggregate lending data at 17.1% by number, significantly above 12.5% by dollar, and significantly above the 18.0% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 12.4% by number and 6.7% by dollar and was significantly above the aggregate lending data, at 5.6% by number and 3.0% by dollar. The bank's performance was below the 19.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.4% by number and 13.1% by dollar, was above the aggregate lending data at 15.2% by number, slightly above 10.7% by dollar, and similar to the 18.0% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 16.3% by number and 13.1% by dollar and was significantly above the aggregate lending data, at 8.7% by number and 4.9% by dollar. The bank's performance was slightly below the 19.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 30.8% by number and 23.7% by dollar, was significantly above the aggregate lending data at 18.5% by number, significantly above 13.0% by dollar, and significantly above the 18.0% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, excellent penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 21.6% by number and 9.4% by dollar and was significantly above the aggregate lending data, at 8.0% by number and 6.3% by dollar. The bank's performance was similar to the 19.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.6% by number and 18.9% by dollar, was slightly above the aggregate lending data at 16.9% by number, above 14.2% by dollar, and similar to the moderate-income families in the assessment area at 18.0%.

In 2020, the bank's lending to low-income borrowers was 24.5% by number and 15.2% by dollar and was significantly above the aggregate lending data, at 6.6% by number and 5.0% by dollar. The bank's performance was slightly above the 19.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.0% by number and 10.6% by dollar, was similar to the aggregate lending data at 18.4% by number, below 14.4% by dollar, and similar to the moderate-income families in the assessment area at 18.0%.

In 2019, the bank's lending to low-income borrowers was 11.5% by number and 13.7% by dollar and was above the aggregate lending data, at 7.8% by number and 5.3% by dollar. The bank's performance was below the 19.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 26.2% by number and 15.4% by dollar, was above the aggregate lending data at 17.8% by number, slightly above 13.7% by dollar, and above the moderate-income families in the assessment area at 18.0%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 37.0% of loans by number and 25.8% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 40.6% by number and 25.5% by dollar, in addition to being significantly below the 90.0% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated



74.4% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 44.3% of loans by number and 27.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly above the aggregate lending data, at 36.0% by number and 22.3% by dollar, in addition to being significantly below the 90.0% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 68.1% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 67.5% of loans by number and 36.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly above the aggregate lending data, at 44.3% by number and 33.5% by dollar, in addition to being slightly below the 89.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 70.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment areas, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T made a relatively high level of community development loans. During the evaluation period, community development lending totaled 6 loans for approximately \$46.9 million. The community development lending in this assessment area represented 1.2% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance of approximately \$23.5 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$16.1 million, this represented an increase in performance. Based on annualized community development loans to deposits, the bank ranked 3<sup>rd</sup> out of four when compared to similarly situated banks that primarily served this assessment area.

M&T's community development lending was spread across community services and revitalization and stabilization as noted in the table.

MSA 25420 (Harrisburg-Carlisle, PA) Community Development Lending January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	0	0	1	20,000	0	0	2	2,337	3	22,337
2021	0	0	1	20,000	0	0	2	4,571	3	24,571
<b>Total</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>40,000</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>6,909</b>	<b>6</b>	<b>46,909</b>

The following are examples of community development lending which benefited the assessment area:

- In 2020 and 2021, the bank provided two lines of credit totaling \$40 million to support working capital needs for a senior living facility. The facility has subsidized units and serves a majority Medicaid-eligible population. These loans supported community services for LMI families in the assessment area.

In 2020 and 2021, the bank provided three PPP loans totaling \$3.4 million to 2 businesses located in LMI census tracts. The loans supported revitalization and stabilization of LMI communities in the assessment area.

### **Innovative and/or Flexible Lending Practices**

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### **INVESTMENT TEST**

M&T’s performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 114 qualified investments and grants totaling approximately \$11.2 million in this assessment area, which included 13 prior period investments totaling \$10.0 million, and 101 grants totaling \$1.2 million. The bank did not have any new investments; thus, investment performance was primarily driven by prior period investments. The community development activity in this assessment area represented 0.9% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants slightly increased since prior evaluation, with \$5.6 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$5.2 million in annualized qualified investments and grants at the previous evaluation. Based on annualized investments and grants to deposits, the bank ranked 3<sup>rd</sup> out of four compared to similarly situated banks that primarily served this assessment area.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 25420 (Harrisburg-Carlisle, PA)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	13	10,017	0	0	0	0	0	0	13	10,017
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0

<b>Total Investments</b>	<b>13</b>	<b>10,017</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>10,017</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>101</b>	<b>1,205</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>101</b>	<b>1,205</b>
<b>Grand Total</b>	<b>13</b>	<b>10,017</b>	<b>101</b>	<b>1,205</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>114</b>	<b>11,222</b>

The following are examples of community development investments and grants that benefited this assessment area.

- Two of the prior period investments, totaling \$8.7 million, were used to build properties that qualified for LIHTC. LIHTC is a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments, the bank supported affordable housing for LMI individuals.
- The bank’s \$1.2 million in grants or donations were entirely comprised of funds to organizations that provide community services for LMI geographies or individuals.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank did not have any new investments. However, all of the bank’s prior period investments primarily promoted affordable housing, which was a community development need within this assessment area. Qualified grants primarily promoted community services towards LMI individuals.

### **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives. The bank’s prior period investments consisted of mortgage-backed securities and LIHTC.

### **SERVICE TEST**

M&T’s performance was adequate in the service test for this assessment area. Delivery systems were readily accessible to all portions of the institution’s assessment area, including LMU areas. To the extent changes were made, the institution’s opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or individuals. The bank provided an adequate level of community development services.

### **Retail Services**

#### *Accessibility of Delivery Systems*

Delivery systems were readily accessible to all portions of the institution’s assessment area. M&T operated 16 full-service branches in this assessment area, of which 5 (31.3%) were in LMI census tracts. The bank maintained a total of 47 ATMs: 1 full-service ATM at 15 branch locations, 2 full-service ATMs at 1 branch location, and 30 offsite ATMs, of which 19 (40.4%) were in LMI census tracts. The bank’s percentage of branches was similar to the percentage of LMI census tracts in this MSA (32.5%) and higher than the percentage of the population residing in LMI census tracts (23.8%). The bank’s ATM percentage was higher than both the percentage of LMI census tracts in this MSA and the percentage of the population residing in LMI census tracts.

***Changes in Branch Locations***

To the extent changes were made, the institution’s opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Although there were three branches closed during the evaluation period, only one was in a moderate-income census tract, the other two were in middle-income census tracts.

***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or individuals. Extended hours were offered in 3 (18.8%) branches, including 2 (40.0%) in LMI census tracts; 12 (75.0%) branches offered weekend hours, including 3 (60.0%) in LMI census tracts; and 14 (87.5%) branches, including 4 (80.0%) branches in LMI census tracts, offered drive-thru hours.

The bank’s products and services in this assessment area were consistent with those discussed at the state level.

**Community Development Services**

M&T provided an adequate level of community development services in this assessment area. The bank provided eight services during the evaluation period that primarily addressed community services. This activity accounted for 0.5% of the bank’s total number of community development services activity. On an annualized basis over 24 months, the bank conducted four community development services, which was significantly lower the previous evaluation’s annualized performance of 46.3 community development services. The bank had 70 hours during the evaluation period, which on an annualized basis was 35.0 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 25420 (Harrisburg-Carlisle, PA) Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	0	7	1	0	<b>8</b>
2021	0	0	0	0	<b>0</b>
<b>Total</b>	<b>0</b>	<b>7</b>	<b>1</b>	<b>0</b>	<b>8</b>

The following are examples of community development services that benefited this assessment area:

- In 2020, five bank employees served on the board of organizations dedicated to providing various services to LMI individuals. The organizations provide housing and shelter, youth development, and emergency services to LMI populations within the assessment area.
- In 2020, one bank employee provided a financial education seminar at an organization that provides community services to LMI individuals.

## METROPOLITAN AREA MSA 49620 (YORK-HANOVER, PA)-- FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 20 of its 664 locations and 115 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 14 institutions operated 114 offices within this assessment area. M&T ranked 1<sup>st</sup> with approximately \$2.6 billion in deposits, which represented 25.3% of the deposit market share and accounted for 2.0% of the bank’s total branch deposits. This assessment area generated approximately 2.5% by number and 1.8% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large institutions, such as PNC Bank and Wells Fargo, as well as regional banks, such as People’s Bank and Fulton Bank.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The MSA 49620 (York-Hanover, PA) assessment area included York County. According to the 2015 ACS, the population of this assessment area was 439,660. The assessment area consisted of 90 census tracts, of which 13 or 14.4% were low-income, 7 or 7.8% were moderate-income, 55 or 61.1% were middle-income, and 15 or 16.7% were upper-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 49620 (York-Hanover, PA) assessment area had 116,539 families, of which 19.4% were low-income (7.8% of which were below the poverty level), 18.4% were moderate-income, 22.3% were middle-income, and 39.9% were upper-income.

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

<b>MSA 49620 (York-Hanover, PA) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$76,312	\$82,154	7.7%
York County, PA	\$76,312	\$82,154	7.7%
Commonwealth of Pennsylvania	\$74,468	\$80,996	8.8%

Source: 2011 - 2015 U.S. Census Bureau American Community Survey  
2016 - 2020 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

**Housing Characteristics**

Based on the 2015 ACS data, the MSA 49620 (York-Hanover, PA) assessment area had 180,237 housing units, of which 68.9% were owner-occupied, 23.9% were rental, and 7.1% were vacant. Of the total housing units, 8.3% were located in low-income census tracts, 7.0% in moderate-income census tracts, 68.5% in middle-income census tracts, and 16.2% in upper-income census tracts. In low-income census tracts, 27.6% of housing units were owner-occupied, 57.1% were rental units, and 15.3% were vacant. In moderate-income census tracts, 60.8% of housing units were owner-occupied, 31.7% were rental units, and 7.5% were vacant.

The median age of housing stock in this assessment area was 42 years old, with 24.9% 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 2015 ACS, the median housing value in this assessment area was \$168,400 with an affordability ratio of 34.6. The median gross rent in the assessment area was \$851 per month.

<b>MSA 49620 (York-Hanover, PA) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$168,400	34.6	\$851
York County, PA	\$168,400	34.6	\$851
Commonwealth of Pennsylvania	\$166,000	32.3	\$840

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

**Housing Cost Burden**

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 43.7% of all rental households had rental costs that exceeded 30% of their incomes, 76.7% of low-income rental households had rental costs that exceeded 30% of their income, and 32.8% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 20.1% of homeowners had housing costs that exceeded 30% of their incomes, 65.5% of low-income homeowners had housing costs that exceeded 30% of their income, and 32.6% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 49620 (York-Hanover, PA) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	76.7%	32.8%	43.7%	65.5%	32.6%	20.1%
York County, PA	76.7%	32.8%	43.7%	65.5%	32.6%	20.1%
Commonwealth of Pennsylvania	72.3%	31.7%	42.0%	61.5%	28.9%	19.6%

*\*Cost Burden is housing cost that equals 30% or more of household income  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 17,574 businesses operating in this assessment area in 2021, of which 8.8% were located in low-income census tracts and 6.6% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.2% were small businesses with a GAR of \$1 million or less, of which 8.6% were located in low-income census tracts and 6.3% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.9% in 2019, increased to 8.0% in 2020, and decreased to 5.4% in 2021. Pennsylvania had an unemployment rate of 4.5% in 2019, increased to 9.1% in 2020, and decreased to 6.3% in 2021.

<b>MSA 49620 (York-Hanover, PA) Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.9%	8.0%	5.4%
York County, PA	3.9%	8.0%	5.4%
State of Pennsylvania	4.5%	9.1%	6.3%

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

Additional performance context data for this assessment area is provided in the following MSA 49620 (York-Hanover, PA) Assessment Area Demographics Table:

<b>MSA 49620 (York-Hanover, PA) Assessment Area Demographics</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	13	14.4	7,075	6.1	2,877	40.7	22,666	19.4
Moderate-income	7	7.8	6,922	5.9	861	12.4	21,428	18.4
Middle-income	55	61.1	81,147	69.6	4,872	6.0	25,979	22.3
Upper-income	15	16.7	21,395	18.4	513	2.4	46,466	39.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>90</b>	<b>100.0</b>	<b>116,539</b>	<b>100.0</b>	<b>9,123</b>	<b>7.8</b>	<b>116,539</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		<b>#</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	14,983	4,133	3.3	27.6	8,559	57.1	2,291	15.3
Moderate-income	12,585	7,652	6.2	60.8	3,986	31.7	947	7.5
Middle-income	123,514	88,163	70.9	71.4	27,577	22.3	7,774	6.3
Upper-income	29,155	24,321	19.6	83.4	3,025	10.4	1,809	6.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>180,237</b>	<b>124,269</b>	<b>100.0</b>	<b>68.9</b>	<b>43,147</b>	<b>23.9</b>	<b>12,821</b>	<b>7.1</b>
	<b>Total Businesses by</b>		<b>Businesses by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	1,548	8.8	1,371	8.6	156	11.7	21	9.3

Moderate-income	1,160	6.6	1,012	6.3	134	10.1	14	6.2
Middle-income	11,702	66.6	10,723	66.9	826	62.2	153	68.0
Upper-income	3,164	18.0	2,914	18.2	213	16.0	37	16.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>17,574</b>	<b>100.0</b>	<b>16,020</b>	<b>100.0</b>	<b>1,329</b>	<b>100.0</b>	<b>225</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.2</b>		<b>7.6</b>		<b>1.3</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	3	0.7	3	0.7	0	0.0	0	0.0
Moderate-income	15	3.4	15	3.4	0	0.0	0	0.0
Middle-income	357	80.4	352	80.2	5	100.0	0	0.0
Upper-income	69	15.5	69	15.7	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>444</b>	<b>100.0</b>	<b>439</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>98.9</b>		<b>1.1</b>		<b>.0</b>

*2021 FFIEC Census Data and 2021 Dun and Bradstreet Information*

## Community Contact

Examiners conducted a community contact interview with one community organization that serves this assessment area. The contact was held with a community organization that provides various social service programs to help with rental assistance, affordable housing, utilities, food, shelter, clothing and emergency services for the poorest individuals and families in York, PA. The organization serves many individuals who are the “working-poor,” including individuals who do not qualify for aid or food stamps, but do not make enough to afford the current cost of living. The contact mentioned there have recently been more requests for rental assistance than ever before, and the problem is more about low wages than unemployment. The contact mentioned there is a population of unbanked in the local community, including migrants/immigrants, that could benefit from no fee accounts. Having an account would also allow them to access support from government agencies.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 49620 (YORK-HANOVER, PA)

### LENDING TEST

M&T’s performance was excellent in the lending test for this assessment area. The bank’s lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.



## Lending Activity

M&T's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. M&T had a large portion of the market share of deposits during the evaluation period. The bank's HMDA market share slightly decreased but remained in the top 10. Small business lending market share was strong as the bank ranked in the top five throughout the evaluation period.

In 2021, the bank ranked 1<sup>st</sup> out of 14 institutions with a deposit market share of 25.3%. In total HMDA lending, the bank ranked 8<sup>th</sup> out of 477 reporters with a market share of 2.7%, including market shares of 1.7% in home purchase lending, 2.7% in refinance, 8.7% in home improvement, and 1.8% in multifamily loans. M&T ranked 4<sup>th</sup> out of 101 reporters with a market share of 7.9% in small business lending.

In 2020, the bank ranked 1<sup>st</sup> out of 13 institutions with a deposit market share of 25.6%. In total HMDA lending, the bank ranked 8<sup>th</sup> out of 447 reporters with a market share of 3.0%, including market shares of 2.0% in home purchase lending, 3.0% in refinance, 10.2% home improvement, and 5.6% in multifamily loans. M&T ranked 1<sup>st</sup> out of 116 reporters with a market share of 12.8% in small business lending.

In 2019, the bank ranked 1<sup>st</sup> out of 13 institutions with a deposit market share of 25.4%. In total HMDA lending, the bank ranked 4<sup>th</sup> out of 401 reporters with a market share of 3.9%, including market shares of 1.7% in home purchase lending, 6.4% in refinance, 9.8% home improvement, and 6.4% in multifamily loans. M&T ranked 4<sup>th</sup> out of 93 reporters with a market share of 6.8% in small business lending.

<b>MSA 49620 (York-Hanover, PA) Summary of Lending Activity January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	374	19.1%	24,739	7.1%
Home Purchase	505	25.8%	89,160	25.5%
Loan Purpose Not Applicable	85	4.3%	11,571	3.3%
Multi-Family	18	0.9%	90,093	25.8%
Refinancing	978	49.9%	134,280	38.4%
<b>Total HMDA</b>	<b>1,940</b>	<b>47.5%</b>	<b>349,843</b>	<b>60.5%</b>
<b>Total Small Business</b>	<b>2,154</b>	<b>52.2%</b>	<b>224,255</b>	<b>38.8%</b>
<b>Total Small Farm</b>	<b>13</b>	<b>0.3%</b>	<b>3,845</b>	<b>0.7%</b>
<b>TOTAL LOAN</b>	<b>4,127</b>	<b>100.0%</b>	<b>577,943</b>	<b>100.0%</b>

## Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 49620 (York-Hanover, PA) assessment area. Lending penetration in LMI tracts was good for home purchase, good for refinance, poor for home improvement, poor for multifamily, and good for small business loans.

### Gap Analysis

M&T demonstrated an excellent level of dispersion in LMI census tracts in this assessment area. In 2019, the bank's performance was at 92.3% and 100.0%, in low-income and moderate-income census tracts, respectively, and maintained the same level in 2020, while experiencing a slight increase in the low-income census tracts in 2021. Overall, performance in this assessment area showed improvement when compared

to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 49620 (York-Hanover, PA)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	13	1	92.3%
Moderate	7	0	100.0%
Middle	55	1	98.2%
Upper	15	0	100.0%
Income Unknown	0	0	
<b>2020</b>			
Low	13	1	92.3%
Moderate	7	0	100.0%
Middle	55	0	100.0%
Upper	15	0	100.0%
Income Unknown	0	0	
<b>2021</b>			
Low	13	0	100.0%
Moderate	7	0	100.0%
Middle	55	0	100.0%
Upper	15	0	100.0%
Income Unknown	0	0	

### ***Home Purchase Loans***

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area.

In 2021, the bank made 8.7% by number and 4.5% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 3.3% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.3% by number and 2.0% by dollar in low-income census tracts. In 2021, the bank made 12.7% of home purchase loans by number and 9.4% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 6.2% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 7.4% by number and 4.7% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 4.5 % by number and 2.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 3.3% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 3.6% by number and 1.5% by dollar in low-income census tracts. In 2020, the bank made 7.3% of home purchase loans by number and 5.0% by dollar in moderate-income census tracts. The bank's home purchase lending

performance was slightly above the 6.2% of owner-occupied housing units located in moderate-income census tracts and was slightly above the aggregate, which made 6.5% by number and 4.4% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 0.7% by number and 0.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly below the 3.3% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate, which made 3.1% by number and 1.3% by dollar in low-income census tracts. In 2019, the bank made 3.9% of home purchase loans by number and 3.1% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the 6.2% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 6.8% by number and 4.3% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 2.1% by number and 1.3% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 3.3% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 2.0% by number and 1.0% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 3.6% by number and 2.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 6.2% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 3.9% by number and 2.7% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 0.9% by number and 0.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 3.3% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 0.9% by number and 0.4% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 4.3% by number and 2.4% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 6.2% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 3.1% by number and 2.0% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 2.2% by number and 0.8% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 3.3% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 1.6% by number and 0.7% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 5.1% by number and 2.9% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 6.2% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 4.2% by number and 2.8% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected poor penetration throughout the assessment area.

In 2021, the bank made 1.5% by number and 0.7% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was

significantly below the 3.3% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 2.1% by number and 1.8% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 2.2% by number and 1.7% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 6.2% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 4.4% by number and 3.0% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 0.8% by number and 1.0% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 3.3% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate, which made 1.8% by number and 1.3% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 3.3% by number and 4.3% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 6.2% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 4.7% by number and 3.7% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 0.8% by number and 0.7% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 3.3% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate, which made 2.2% by number and 1.6% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 4.2% by number and 4.3% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 6.2% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 4.1% by number and 3.2% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected poor penetration throughout the assessment area.

In 2021, the bank made 50.0% by number and 1.8% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 17.8% of multifamily housing units located in low-income census tracts and above the aggregate, which made 35.7% by number and 7.9% by dollar of multifamily loans in low-income census tracts. The bank did not make any multifamily loans in moderate-income census tracts.

In 2020, the bank made 14.3% by number and 0.2% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 7.2% of multifamily housing units located in low-income census tracts and below the aggregate, which made 28.1% by number and 15.2% by dollar of multifamily loans in low-income census tracts. The bank did not make any multifamily loans in moderate-income census tracts.

In 2019, the bank made 11.1% by number and 2.7% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly below the 17.8% of multifamily housing units located in low-income census tracts and significantly below the aggregate, which made 23.4% by number and 8.9% by dollar of multifamily loans in low-income census tracts. In 2019, the bank made 22.2% by number and 2.1% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was

significantly above the 7.2% of multifamily housing units located in moderate-income census tracts and significantly above the aggregate, which made 13.8% by number and 4.2% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 6.9% by number and 6.9% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 8.8% of businesses located in low-income census tracts and similar to the aggregate, which made 7.6% by number and 8.6% by dollar of small business loans in low-income census tracts. In 2021, the bank made 5.7% by number and 5.0% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 6.6% of businesses located in moderate-income census tracts and similar to the aggregate, which made 6.1% by number and 7.1% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 8.5% by number and 9.0% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 8.8% of businesses located in low-income census tracts and slightly above the aggregate, which made 7.6% by number and 8.7% by dollar of small business loans in low-income census tracts. In 2020, the bank made 7.4% by number and 6.7% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly above the 6.6% of businesses located in moderate-income census tracts and slightly above the aggregate, which made 6.7% by number and 8.4% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 7.1% by number and 10.6% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 8.8% of businesses located in low-income census tracts and similar to the aggregate, which made 6.7% by number and 8.1% by dollar of small business loans in low-income census tracts. In 2019, the bank made 5.2% by number and 7.2% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 6.5% of businesses located in moderate-income census tracts and similar to the aggregate, which made 5.4% by number and 6.5% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 23.7% by number and 14.7% by dollar to low-income borrowers and was slightly above the 19.4% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 9.1% by number and 5.2% by dollar to low-income families. The bank's

lending to moderate-income borrowers was 28.9% by number and 26.4% by dollar, which was slightly above the aggregate performance of 23.6% by number, above 18.6% by dollar, and significantly above the 18.4% moderate-income families in the assessment area.

In 2020, the bank made 16.8% by number and 10.9% by dollar to low-income borrowers and was slightly below the 19.4% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 10.5% by number and 6.2% by dollar to low-income families. The bank's lending to moderate-income borrowers was 26.8% by number and 22.7% by dollar, which was similar to the aggregate performance of 24.8% by number, slightly above 20.2% by dollar, and above the 18.4% moderate-income families in the assessment area.

In 2019, the bank made 9.8% by number and 6.2% by dollar to low-income borrowers and was significantly below the 19.4% of low-income families in the assessment area. Performance was slightly above aggregate lending, which made 8.5% by number and 4.8% by dollar to low-income families. The bank's lending to moderate-income borrowers was 25.5% by number and 20.4% by dollar, which was slightly above the aggregate performance of 22.5% by number, slightly above 17.7% by dollar, and above the 18.4% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 11.6% by number and 6.3% by dollar and was significantly above the aggregate lending data, at 5.2% by number and 2.9% by dollar. The bank's performance was below the 19.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 22.6% by number and 18.3% by dollar, was above the aggregate lending data at 16.7% by number, above 12.7% by dollar, and slightly above the 18.4% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 10.1% by number and 5.4% by dollar and was significantly above the aggregate lending data, at 5.0% by number and 2.7% by dollar. The bank's performance was below the 19.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 20.7% by number and 16.0% by dollar, was above the aggregate lending data at 14.1% by number, significantly above 10.0% by dollar, and slightly above the 18.4% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 13.1% by number and 7.6% by dollar and was significantly above the aggregate lending data, at 8.3% by number and 4.4% by dollar. The bank's performance was below the 19.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 25.2% by number and 19.5% by dollar, was above the aggregate lending data at 17.5% by number, significantly above 12.1% by dollar, and above the 18.4% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 11.1% by number and 7.9% by dollar and was above the aggregate lending data, at 8.4% by number and 6.7% by dollar. The bank's performance was below the 19.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 18.5% by number and 17.1% by dollar, was similar to the aggregate lending data at 17.9% by number, slightly above 15.2% by dollar, and similar to the moderate-income families in the assessment area at 18.4%.

In 2020, the bank's lending to low-income borrowers was 12.4% by number and 9.3% by dollar and was above the aggregate lending data, at 9.1% by number and 7.4% by dollar. The bank's performance was below the 19.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.8% by number and 17.4% by dollar, was slightly above the aggregate lending data at 17.3% by number, slightly above 14.6% by dollar, and similar to the moderate-income families in the assessment area at 18.4%.

In 2019, the bank's lending to low-income borrowers was 11.0% by number and 9.1% by dollar and was above the aggregate lending data, at 7.9% by number and 7.5% by dollar. The bank's performance was below the 19.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 20.3% by number and 18.3% by dollar, was slightly above the aggregate lending data at 17.5% by number, slightly above 14.9% by dollar, and slightly above the moderate-income families in the assessment area at 18.4%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 36.8% of loans by number and 26.3% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly below the aggregate lending data, at 48.7% by number and 33.0% by dollar, in addition to being significantly below the 91.2% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 75.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 46.3% of loans by number and 25.9% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 44.4% by number and 32.6% by dollar, in addition to being below the 91.2% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 74.0% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 64.0% of loans by number and 28.1% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 48.9% by number and 39.2% by dollar, in addition to being below the 90.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 75.3% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T was a leader in making community development loans. During the evaluation period, community development lending totaled 10 loans for approximately \$95.7 million. The community development lending in this assessment area represented 2.4% by dollar volume of the bank’s total community development lending across all assessment areas. This lending level represented an annualized performance of approximately \$47.9 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$7.9 million, this represented a significant increase. Additionally, based on annualized community development loans to deposits, the bank ranked 1<sup>st</sup> out of four, compared to similarly situated banks that primarily served this assessment area.

The institution’s community development loans by year and purpose are summarized in the table below.

<b>MSA 49620 (York-Hanover, PA) Community Development Lending January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	0	0	2	78,000	0	0	4	14,049	6	92,049
2021	1	723	1	500	1	1,036	1	1,424	4	3,683
<b>Total</b>	<b>1</b>	<b>723</b>	<b>3</b>	<b>78,500</b>	<b>1</b>	<b>1,036</b>	<b>5</b>	<b>15,473</b>	<b>10</b>	<b>95,732</b>

The following are examples of community development lending which benefited the assessment area:

- In 2021, the bank provided a line of credit for \$500,000 to a non-profit organization that provides community services to low-income and in-crisis families and individuals. This loan supported community services for LMI families in the assessment area.
- In 2020 and 2021, the bank provided five PPP loans totaling \$15.5 million to businesses in LMI census tracts. These loans all supported revitalization and stabilization of LMI geographies in the assessment area.

### Innovative and/or Flexible Lending Practices

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### INVESTMENT TEST

M&T’s performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited good responsiveness to credit and community economic development needs, which is a community development



need within this assessment area. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 57 qualified investments and grants totaling approximately \$7.0 million in this assessment area, which included 11 prior period investments totaling \$6.2 million, and 46 grants totaling \$820,000. The bank did not have any new investments. The community development activity in this assessment area represented 0.5% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments significantly increased since prior evaluation, with \$3.5 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$1.9 million in annualized qualified investments and grants at the previous evaluation. However, based on annualized community development investments and grants to deposits, the bank ranked 3<sup>rd</sup> out of four compared to similarly situated banks that primarily served this assessment area. Furthermore, the bank’s investment performance was entirely driven by prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 49620 (York-Hanover, PA) Qualified Investments and Grants January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	11	6,213	0	0	0	0	0	0	11	6,213
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0
<b>Investments Total</b>	<b>11</b>	<b>6,213</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>6,213</b>
<b>Grants Total</b>	<b>0</b>	<b>0</b>	<b>46</b>	<b>820</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>46</b>	<b>820</b>
<b>Grand Total</b>	<b>11</b>	<b>6,213</b>	<b>46</b>	<b>820</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>57</b>	<b>7,033</b>

The following are examples of community development investments and grants that benefited this assessment area:

- Three of the prior period investments totaling \$4.0 million, were used to build properties that qualified for LIHTC. LIHTC is a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments, the bank supported affordable housing for LMI individuals.
- In 2020 and 2021, the bank provided two grants totaling \$100,000 to a community development corporation that provides affordable housing to LMI families and provides several community service programs to LMI communities.

### Responsiveness to Credit and Community Development Needs

M&T exhibited adequate responsiveness to credit and community economic development needs. The bank did not have any new qualified investments. All of the bank's qualified investments promoted affordable housing, which was a community development need within this assessment area. Qualified grants promoted community services towards LMI individuals.

### **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives. The bank did not have any new qualified investments. The prior period investments consisted of mortgage-backed securities and LIHTC.

### **SERVICE TEST**

M&T's performance was adequate in the service test for this assessment area. Delivery systems were accessible to essentially all portions of the institution's assessment area, including areas. To the extent changes were made, the institution's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in geographies and/or to individuals. Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or individuals. The bank provided a relatively high level of community development services.

### **Retail Services**

#### ***Accessibility of Delivery Systems***

Delivery systems were accessible to essentially all portions of the institution's assessment area. M&T operated 20 full-service branches in this assessment area, of which 4 (20.0%) were in LMI census tracts. The bank maintained a total of 115 ATMs, 1 full-service ATM at 11 branch locations, 2 full-service ATMs at 9 branch locations, and 86 offsite ATMs, of which 19 (16.5%) were in LMI census tracts. The bank's percentage of branches was similar to the percentage of LMI census tracts in this MSA (22.2%) and higher than the percentage of the population residing in LMI census tracts (14.4%). The ATM percentage was lower than the percentage of LMI census tracts, but similar to the percentage of the population residing in LMI census tracts.

#### ***Changes in Branch Locations***

To the extent changes were made, the institution's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Although there were three branches closed during the evaluation period, two were in middle-income census tracts and the other in an upper-income census tract.

#### ***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or individuals. None of the branches offered extended hours; 15 (75.0%) branches offered weekend hours, including 1 (60.0%) in a moderate-income census tract; and 19 (95.0%) branches, including 3 (75.0%) branches in LMI census tracts, offered drive-thru hours.

The bank's products and services in this assessment area were consistent with those discussed at the state level.

**Community Development Services**

M&T provided an adequate level of community development services in this assessment area. The bank conducted 37 services during the evaluation period that primarily addressed community services. This activity accounted for 2.3% of the bank’s total number of community development services activity. On an annualized basis over 24 months, the bank made 18.5 community development services, which was lower the previous evaluation’s annualized performance of 51.0 community development services. The bank had 116 hours during the evaluation period, which on an annualized basis was 58.0 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 49620 (York-Hanover, PA) Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	0	3	0	0	<b>3</b>
2021	0	34	0	0	<b>34</b>
<b>Total</b>	<b>0</b>	<b>37</b>	<b>0</b>	<b>0</b>	<b>37</b>

The following is an example of community development services that benefited this assessment area:

- In 2020 and 2021, five bank employees served on the board of organizations dedicated to providing various services to LMI individuals. The organizations provide youth development, and emergency services to LMI populations within the assessment area.

## METROPOLITAN AREA MSA 11020 (ALTOONA, PA) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated six of its 664 locations and 19 of its 1,882 ATMs in this assessment area. These branches generated \$1.1 billion in deposits which accounted for 0.9% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.6% by number and 0.4% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in central Pennsylvania, this assessment area consisted of the entire MSA comprised of Blair County. The principal city in this assessment area was Altoona, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 11020 (Altoona, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	3	8.8%	3.1%	19.9%
Moderate Income	4	11.8%	9.0%	18.7%
Middle Income	25	73.5%	77.6%	21.9%
Upper Income	2	5.9%	10.2%	39.5%
Unknown	0	0.0%	0.0%	0.0%
<b>Total</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 11020 (Altoona, PA)	Below	Consistent	Below

M&T’s lending test performance in the assessment area was below Pennsylvania’s performance, as lending activity, borrower distribution and geographic distribution were adequate. The bank made a total of 4 qualified community development loans totaling \$5.6 million during the evaluation period.

Investment test performance was consistent with Pennsylvania’s performance. The bank had no new investments and 3 prior period investments totaling \$422,000. The bank also made 67 grants and donations totaling \$419,000.

Service test performance was below Pennsylvania’s performance. The bank operated 2 (33.3%) of its branches and 6 (31.6%) ATMs in the assessment area in LMI census tracts. The bank closed two branch locations in middle-income census tracts that were adjacent to LMI census tracts. The bank had no community development services during the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 14100 (BLOOMSBURG-BERWICK, PA)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated three of its 664 locations and four of its 1,882 ATMs in this assessment area. These branches generated \$128.3 million in deposits which accounted for 0.1% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.1% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in northeast Pennsylvania, the assessment area consisted of the entire MSA, comprised of Columbia and Montour Counties. The principal cities in the assessment area were Bloomsburg and Berwick, PA, located in Columbia County.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 14100 (Bloomsburg-Berwick, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0.0	0.0	19.0%
Moderate Income	3	15.8%	11.6%	19.2%
Middle Income	13	68.4%	71.2%	21.0%
Upper Income	3	15.8%	17.2%	40.8%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 14100 (Bloomsburg-Berwick, PA)	Below	Below	Below

M&T's lending test performance in this assessment area was below Pennsylvania's performance, as lending activity was adequate, borrower distribution was adequate, and geographic distribution was good. There were no community development loans in the assessment area during the evaluation period.

Investment test performance was below Pennsylvania's performance. The bank had no investments and made 7 grants and donations totaling \$36,000.

Service test performance was below Pennsylvania's performance. The bank operated 1 (33.3%) of its branches and 1 (25.0%) of its ATMs in this assessment area in LMI census tracts. The bank had no community development services during the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 16540 (CHAMBERSBURG-WAYNESBORO, PA)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTIO'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 8 of its 664 locations and 22 of its 1,882 ATMs in this assessment area. These branches generated \$540.5 million in deposits which accounted for 0.4% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.7% by number and 0.4% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in south central Pennsylvania, the assessment area consisted of the entire MSA, comprised of Franklin County. The principal cities in the assessment area were Chambersburg and Waynesboro, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 16540 (Chambersburg-Waynesboro, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	#	%		
Low Income	1	3.7%	1.4%	18.6%
Moderate Income	4	14.8%	6.5%	19.9%
Middle Income	20	74.1%	82.7%	22.3%
Upper Income	2	7.4%	9.4%	39.2%
Unknown	0	0.00	0.00	0.00
<b>Total</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 16540 (Chambersburg-Waynesboro, PA)	Below	Above	Below

M&T’s lending test performance in the assessment area was below Pennsylvania’s performance, as lending activity, borrower distribution, and geographic distribution were all adequate. The bank made 3 qualified community development loans totaling \$4.9 million in the assessment area during the evaluation period.

Investment test performance was above Pennsylvania’s performance. The bank had a total of 3 investments totaling \$12.7 million consisting of 1 new investment for \$12.6 million, and 2 prior period investments totaling \$123,000. The bank also made 26 grants and donations totaling \$131,000.

Service test performance was below Pennsylvania’s performance. The bank operated 2 (25.0%) of its branches and 7 (31.8%) ATMs in the assessment area in LMI census tracts. The bank had one instance totaling eight hours of community development service in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 20700 (EAST STROUDSBURG, PA)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTIO'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 1 of its 664 locations and 1 of its 1,882 ATMs in this assessment area. This branch generated \$47.0 million in deposits which accounted for 0.04% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.1% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in northeast Pennsylvania, the assessment area consisted of the entire MSA, comprised of Monroe County. The principal cities in the assessment area were East Stroudsburg and Arlington Heights, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 20700 (East Stroudsburg, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0.0	0.0	20.7%
Moderate Income	5	15.2%	8.0%	18.1%
Middle Income	26	78.8%	86.4%	21.3%
Upper Income	2	6.0%	5.6%	39.9%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 20700 (East Stroudsburg, PA)	Below	Below	Below

M&T's lending test performance in this assessment area was below Pennsylvania's performance, as lending activity was adequate, borrower distribution was adequate, and geographic distribution was good. There were no qualified community development loans during the evaluation period.

Investment test performance was below Pennsylvania's performance. The bank had no investments and made 2 grants and donations totaling \$8,000.

Service test performance was below Pennsylvania's performance. The bank's only branch and ATM were in a middle-income census tract. There were no qualified community development services during the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 23900 (GETTYSBURG, PA)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 1 of its 664 locations and 7 of its 1,882 ATMs in this assessment area. These branches generated \$99.6 million in deposits which accounted for 0.1% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.4% by number and 0.3% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southeast Pennsylvania, the assessment area consisted of the entire MSA, comprised of Adams County. The principal cities in the assessment area were Gettysburg and Littlestown, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 23900 (Gettysburg, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	#	%		
Low Income	0	0.0	0.0	17.9%
Moderate Income	1	4.4%	2.2%	18.6%
Middle Income	19	82.6%	83.9%	24.3%
Upper Income	3	13.0%	13.9%	39.3%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 23900 (Gettysburg, PA)	Below	Below	Consistent

M&T's lending test performance in this assessment area was below Pennsylvania's performance, as lending activity was adequate, borrower distribution was adequate, and geographic distribution was good. There were no qualified community development loans for the evaluation period.

Investment test performance was below Pennsylvania's performance. The bank had no investments and made 3 grants and donations totaling \$9,000.

Service test performance was consistent with Pennsylvania's performance. The bank's only branch and 1 ATM (14.3%) were in an LMI census tract in the assessment area. There were no qualified community development services during the evaluation period.



Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 29540 (LANCASTER, PA)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 7 of its 664 locations and 29 of its 1,882 ATMs in this assessment area. These branches generated \$592.2 million in deposits which accounted for 0.5% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.8% by number and 0.9% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southeast Pennsylvania, the assessment area consisted of the entire MSA, comprised of Lancaster County. The principal cities in the assessment area were Lancaster and Ephrata, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 29540 (Lancaster, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	6	6.1%	1.6%	18.3%
Moderate Income	14	14.3%	8.8%	19.2%
Middle Income	67	68.4%	76.1%	23.1%
Upper Income	11	11.2%	13.5%	39.4%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>98</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 29540 (Lancaster, PA)	Below	Above	Below

M&T's lending test performance in this assessment area was below Pennsylvania's performance, as lending activity was adequate, borrower distribution was good, and geographic distribution was adequate. The bank made 2 qualified community development loans totaling \$2.7 million in the assessment area.

Investment test performance was above Pennsylvania's performance. The bank made 2 investments totaling \$6.7 million which consisted of all prior period investments. The bank also made 35 grants and donations totaling \$324,000.

Service test performance was below Pennsylvania's performance. There were no branches located in LMI census tracts and only 1 ATM (3.4%) in an LMI tract in the assessment area. The bank had 11 instances totaling 24 hours of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 30140 (LEBANON, PA)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 1 of its 664 locations and 10 of its 1,882 ATMs in this assessment area. This branch generated \$101.3 million in deposits which accounted for 0.1% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.1% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southeast Pennsylvania, the assessment area consisted of the entire MSA, comprised of Lebanon County. The principal cities in the assessment area were Lebanon and Palmyra, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 30140 (Lebanon, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	1	3.2%	1.3%	18.0%
Moderate Income	6	19.4%	12.1%	19.0%
Middle Income	20	64.5%	67.8%	24.8%
Upper Income	4	12.9%	18.8%	38.2%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 30140 (Lebanon, PA)	Consistent	Below	Consistent

M&T's lending test performance in the assessment area was consistent with Pennsylvania's performance, as lending activity, borrower distribution, and geographic distribution were all good. The bank made 1 qualified community development loan totaling \$2.0 million.

Investment test performance was below Pennsylvania's performance. The bank had no new investments, and only \$176 in prior period investments. M&T made only 1 grant totaling \$8,000.

Service test performance was consistent with Pennsylvania's performance. The bank's only branch and 1 ATM (10.0%) was located in an LMI census tract in the assessment area. There were no qualified community development services during the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 39740 (READING, PA)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 11 of its 664 locations and 25 of its 1,882 ATMs in this assessment area. These branches generated \$952.2 million in deposits which accounted for 0.7% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.9% by number and 0.5% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southeast Pennsylvania, the assessment area consisted of the entire MSA, comprised of Berks County. The principal cities in the assessment area were Reading and Wyomissing, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 39740 (Reading, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	19	21.1%	7.1%	21.4%
Moderate Income	7	7.8%	4.1%	17.1%
Middle Income	48	53.3%	61.1%	21.4%
Upper Income	16	17.8%	27.7%	40.1%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>90</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 39740 (Reading, PA)	Below	Above	Consistent

M&T's lending test performance in this assessment area was below Pennsylvania's performance, as lending activity was adequate, borrower distribution was good, and geographic distribution was poor. There were no qualified community development loans during the evaluation period.

Investment test performance was above Pennsylvania's performance. The bank had 5 investments totaling \$5.5 million, which consisted of all prior period investments. The bank also made 43 grants and donations totaling \$259,000.

Service test performance was consistent with Pennsylvania's performance. The bank operated 1 (9.1%) of its branches and 2 (8.0%) ATMs in the assessment area in LMI census tracts. In addition, the bank had 16 instances totaling 65 hours of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 42540 (SCRANTON-WILKES BARRE, PA) – LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 11 of its 664 locations and 18 of its 1,882 ATMs in this assessment area. These branches generated \$1.38 billion in deposits which accounted for 1.1% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 1.4% by number and 0.7% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in northeast Pennsylvania, the assessment area consisted of the entire MSA, comprised of Lackawanna, Luzerne, and Wyoming Counties. The principal cities in the assessment area were Scranton, Wilkes Barre, and Tunkhannock, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 42540 (Scranton-Wilkes Barre, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	6	3.5%	1.6%	21.3%
Moderate Income	42	24.7%	14.2%	17.7%
Middle Income	87	51.2%	56.5%	20.4%
Upper Income	33	19.4%	27.5%	40.6%
Unknown	2	1.2%	0.0	0.0
<b>Total</b>	<b>170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 42540 (Scranton-Wilkes Barre, PA)	Consistent	Above	Above

M&T's lending test performance in the assessment area was consistent with Pennsylvania's performance, as lending activity was good, borrower distribution was good, and geographic distribution was adequate. The bank made 5 qualified community development loans totaling \$8.5 million during the evaluation period.

Investment test performance was above Pennsylvania's performance. The bank had a total of 6 investments totaling \$9.3 million consisting of 1 new investment for \$8.7 million and 5 prior period investments totaling \$636,000. The bank also made 62 grants and donations totaling \$563,000.

Service test performance was above Pennsylvania’s performance. The bank operated 1 (9.1%) of its branches and 2 (11.1%) ATMs in the assessment area in LMI census tracts. The bank had 45 instances, totaling 125 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 44300 (STATE COLLEGE, PA)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 3 of its 664 locations and 5 of its 1,882 ATMs in this assessment area. These branches generated \$341.7 million in deposits which accounted for 0.3% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.3% by number and 0.3% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in central Pennsylvania, the assessment area consisted of the entire MSA, comprised of Centre County. The principal cities in the assessment area were State College and Park Forest Village, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 44300 (State College, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	1	3.2%	0.0	19.6%
Moderate Income	6	19.4%	16.0%	18.5%
Middle Income	12	38.7%	51.7%	21.5%
Upper Income	8	25.8%	31.5%	40.4%
Unknown	4	12.9%	0.8%	0.0
<b>Total</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 44300 (State College, PA)	Below	Above	Above

M&T’s lending test performance in this assessment area was below Pennsylvania’s performance, as lending activity, borrower distribution, and geographic distribution were all good. There were no qualified community development loans during the evaluation period.

Investment test performance was above Pennsylvania’s performance. The bank had a total of 2 investments totaling \$4.1 million, which consisted of all prior period investments. The bank also made 25 grants and donations totaling \$137,000.

Service test performance was above Pennsylvania’s performance. The bank operated 2 (66.7%) of its branches and 2 (40.0%) ATMs in the assessment area in LMI census tracts. The bank had seven instances totaling 85 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## **METROPOLITAN AREA MSA 48700 (WILLIAMSPORT, PA)-- LIMITED REVIEW**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 3 of its 664 locations and 9 of its 1,882 ATMs in this assessment area. These branches generated \$542.6 million in deposits which accounted for 0.4% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.2% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in northeast Pennsylvania, the assessment area consisted of the entire MSA, comprised of Lycoming County. The principal city in the assessment area is Williamsport, PA.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 48700 (Williamsport, PA) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	2	6.9%	1.4%	20.0%
Moderate Income	4	13.8%	7.2%	18.7%
Middle Income	21	72.4%	84.3%	22.1%
Upper Income	2	6.9%	7.1%	39.2%
Unknown	0	0.0	0.0	0.00
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 48700 (Williamsport, PA)	Below	Above	Consistent

M&T’s lending test performance in the assessment area was below the state of Pennsylvania performance, as lending activity was adequate, borrower distribution was good, and geographic distribution was good. The bank made two qualified community development loans totaling \$5.0 million during the evaluation period.

Investment test performance was above the state of Pennsylvania performance. The bank had a total of one investment totaling \$8.3 million, which consisted of a prior period investment. The bank also made 19 grants and donations totaling \$123,000.

Service test performance was consistent with the state of Pennsylvania performance. The bank operated one (33.3%) of its branches and five (55.6%) ATMs in the assessment area in LMI census tracts. There were no community development services during the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## NON-METROPOLITAN AREA GROUP A, PA-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 2 of its 664 locations and 3 of its 1,882 ATMs in this assessment area. These branches generated \$145.1 million in deposits which accounted for 0.1% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.1% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in northeast Pennsylvania, the assessment area consisted of all of Bradford and Sullivan counties.

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group A, PA Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0.0	0.0	17.9%
Moderate Income	0	0.0	0.0	18.4%
Middle Income	14	87.5%	84.7%	20.6%
Upper Income	2	12.5%	15.3%	43.1%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group A, PA	Below	Above	Below

M&T's lending test performance in the assessment area was below Pennsylvania's performance, as lending activity was good, borrower distribution was good, and geographic distribution was very poor. There were no qualified community development loans during the evaluation period.



Investment test performance was above Pennsylvania’s performance. The bank had a total of 2 investments totaling \$18.5 million, which consisted of prior period investments. The bank also made 3 grants and donations totaling \$3,000.

Service test performance was below Pennsylvania’s performance. There were no branches or ATMs in the assessment located in LMI census tracts. There were no community development services for the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## NON-METROPOLITAN AREA GROUP B, PA-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 15 of its 664 locations and 27 of its 1,882 ATMs in this assessment area. These branches generated \$903.8 million in deposits which accounted for 0.7% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 1.1% by number and 0.5% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in central Pennsylvania, the assessment area consisted of all of Northumberland, Schuylkill, Snyder, and Union Counties.

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group B, PA Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0.0	0.0	18.6%
Moderate Income	13	15.9%	10.5%	18.9%
Middle Income	54	65.9%	72.1%	21.1%
Upper Income	11	13.4%	17.3%	41.4%
Unknown	4	4.9%	0.1%	0.0
<b>Total</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group B, PA	Consistent	Below	Consistent



M&T’s lending test performance in this assessment area was consistent with Pennsylvania’s performance, as lending activity was adequate, borrower distribution was adequate, and geographic distribution was good. The bank made a total of 2 qualified community development loans totaling \$4.7 million.

Investment test performance was below Pennsylvania’s performance. The bank had no investments and made 54 grants and donations totaling \$216,000.

Service test performance was consistent with Pennsylvania’s performance. The bank operated 4 (26.7%) of its branches and 6 (22.2%) ATMs in the assessment area in LMI census tracts. In addition, the bank had 5 instances totaling 4 hours of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## NON-METROPOLITAN AREA GROUP C, PA-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 2 of its 664 locations and 4 of its 1,882 ATMs in this assessment area. These branches generated \$110.2 million in deposits which accounted for 0.1% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.1% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southwest and south-central Pennsylvania, the assessment area consisted of all of Bedford County and part of Huntingdon County (12 census tracts were omitted from Huntingdon County).

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group C, PA Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0.0	0.0	19.5%
Moderate Income	0	0.0	0.0	17.6%
Middle Income	11	91.6%	93.0%	24.2%
Upper Income	1	8.4%	7.0%	38.7%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group C, PA	Below	Below	Below

M&T’s lending test performance in the assessment area was below Pennsylvania’s performance, as lending activity was good, borrower distribution was good, and geographic distribution was very poor. There were no qualified community development loans during the evaluation period.

Investment test performance was below Pennsylvania’s performance. The bank had no investments and made 15 grants and donations totaling \$47,000.

Service test performance was below Pennsylvania’s performance. There were no branches or ATMs located in LMI census tracts in this assessment area. There were no community development services for the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## **NON-METROPOLITAN AREA GROUP D, PA-- LIMITED REVIEW**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

A limited evaluation of M&T’s performance in this assessment area was conducted. As of December 31, 2021, M&T operated 1 of its 664 locations and 4 of its 1,882 ATMs in this assessment area. This branch generated \$101.1 million in deposits which accounted for 0.1% of the bank’s total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.1% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021.

Located in central Pennsylvania, the assessment area consisted of all of Clearfield and Clinton Counties.

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group D, PA Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	1	3.5%	0.6%	19.9%
Moderate Income	3	10.3%	8.2%	19.5%
Middle Income	25	86.2%	91.2%	23.0%
Upper Income	0	0.0	0.0	37.6%
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group D, PA	Below	Below	Below

M&T's lending test performance in this assessment area was below Pennsylvania's performance, as lending activity was adequate, borrower distribution was adequate, and geographic distribution was poor. There were no qualified community development loans during the evaluation period.

Investment test performance was below Pennsylvania's performance. The bank had no investments and made 4 grants and donations totaling \$5,000.

Service test performance was below Pennsylvania's performance. The bank's only branch was not in an LMI census tract and operated 1 ATM (25.0%) in the assessment area in an LMI census tract. The bank had two instances totaling four hours of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## STATE OF MARYLAND

### CRA RATING FOR MARYLAND: OUTSTANDING

*The Lending Test is rated: Outstanding*

*The Investment Test is rated: Outstanding*

*The Service Test is rated: High Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Used innovative and/or flexible lending practices in serving assessment area credit needs.

#### INVESTMENT TEST

- Made an excellent level of qualified community development investments and grants, often in a leadership position, particularly those not routinely provided by private investors.
- Exhibited excellent responsiveness to credit and community development needs.
- Made significant use of innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were reasonably accessible to essentially all portions of the bank's assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- A leader in providing community development services.

## SCOPE OF EXAMINATION

Examiners conducted a full-scope review of the following assessment area in the state of Maryland:

1. MSA 12580 (Baltimore-Columbia-Towson, MD)

In order to derive the state rating, the full-scope assessment areas were weighted based on the proportion of loan originations, deposits, and branches in each area. M&T's full-scope area made up 91.1% by number and 93.0% by dollar volume of the total lending activity; 96.0% of the deposits; and 86.4% of the branches and 92.4% ATMs in the Maryland rated area.

Additionally, limited-scope reviews were conducted in the remaining Maryland assessment areas:

1. MSA 15680 (California-Lexington Park, MD)
2. MSA 25180 (Hagerstown-Martinsburg, MD)
3. Non-MSA Group A (Caroline, Dorchester, and Talbot counties)
4. Non-MSA Group B (Garrett County)

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 103 of its 664 locations and 395 of its 1,882 ATMs in the state of Maryland rated area, not including branches or ATMs in any multistate assessment areas. This rated area generated approximately 14.2% by number and 10.9% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. According to the June 30, 2021 FDIC Summary of Deposit Report, M&T held approximately \$22.9 billion in deposits in the state of Maryland rated area, which accounted for 17.6% of the bank's total deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF MARYLAND

### LENDING TEST

M&T's Lending Test performance in the state of Maryland is rated Outstanding. Lending levels reflected good responsiveness to assessment area credit needs. The geographic distribution of loans reflected good penetration throughout the assessment areas. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses. The bank was a leader in making community development loans. The bank made use of innovative and/or flexible lending practices in serving assessment area credit needs.

### Lending Activity

M&T's lending activity demonstrated good responsiveness to the retail credit needs of the assessment areas in this state. This conclusion was primarily based on the bank providing good responsiveness in the MSA 12580 (Baltimore-Columbia-Towson, MD assessment area.

The bank's lending in this state is summarized in the table below.

<b>Summary of Lending Activity in State of Maryland January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	1,859	24.1%	153,659	7.4%
Home Purchase	1,822	23.6%	485,472	23.5%
Loan Purpose Not Applicable	569	7.4%	103,469	5.0%
Multi-Family	43	0.6%	558,627	27.0%
Refinancing	3,435	44.4%	764,121	37.0%
<b>Total HMDA</b>	<b>7,728</b>	<b>32.5%</b>	<b>2,065,348</b>	<b>58.3%</b>
<b>Total Small Business</b>	<b>16,060</b>	<b>67.5%</b>	<b>1,478,914</b>	<b>41.7%</b>
<b>Total Small Farm</b>	<b>2</b>	<b>0.0</b>	<b>650</b>	<b>0.0</b>
<b>TOTAL LOANS</b>	<b>23,790</b>	<b>100.0%</b>	<b>3,544,912</b>	<b>100.0%</b>

### Geographic Distribution

The geographic distribution of loans reflected good penetration within the state of Maryland. Examiners based this conclusion on the distribution of loans in the LMI census tracts. The performance under the Geographic Distribution criterion was generally consistent for the assessment areas within the rated area. For details, please refer to the Geographic Distribution of Loans section for each full-scope assessment area.

### Borrower Distribution

The distribution of borrowers reflected, given the product lines offered by the institution, good penetration among retail customers of different income levels and among business customers of different sizes throughout the state of Maryland. Examiners based this conclusion on the percentage of loans to LMI borrowers. The performance under the Borrower Distribution criterion was generally consistent for the assessment areas within the rated area. For details, please refer to the Borrower Distribution section for each full-scope assessment area.

### Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses.

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment areas in this state, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T was a leader in making community development loans in the state of Maryland. This conclusion was primarily based on the bank being a leader in making community development loans in the MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area. The community development lending in this rated area represented 10.7% of the bank's total community development lending across all rated areas.

The bank originated 73 qualified community development loans totaling approximately \$423.0 million across the Maryland rated area, representing an overall annualized performance over 24 months of 36.5 loans totaling \$211.5 million. Included in the bank's community development lending were 47 PPP loans in amounts greater than \$1 million, totaling approximately \$95.8 million cumulatively, that had a primary purpose of revitalization and stabilization.

The bank's community development lending activity by assessment area for each community development purpose is summarized in the table below.

<b>State of Maryland Rated Area Community Development Lending January 1, 2020 to December 31, 2021</b>										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
MSA 12580 (Baltimore-Columbia-Towson, MD)	10	124,739	10	157,961	3	23,834	43	89,456	<b>66</b>	<b>395,990</b>
MSA 15680 (California-Lexington Park, MD)	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
MSA 25180 (Hagerstown-Martinsburg, MD-WV)	1	7,275	1	8,573	0	0	3	5,359	<b>5</b>	<b>21,207</b>
Non-MSA Group A	1	4,725	0	0	0	0	1	1,031	<b>2</b>	<b>5,756</b>
Non-MSA Group B	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
<b>Total</b>	<b>12</b>	<b>136,739</b>	<b>11</b>	<b>166,534</b>	<b>3</b>	<b>23,834</b>	<b>47</b>	<b>95,846</b>	<b>73</b>	<b>422,953</b>

### **Innovative and/or Flexible Lending Practices**

The institution used innovative and/or flexible lending practices in order to serve assessment area credit needs in this state. The bank's products and services in the state of Maryland were consistent with those discussed at the institution level.

### **INVESTMENT TEST**

M&T's performance under the Investment Test in the state Maryland is rated Outstanding. The bank had an excellent level of qualified community development investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited excellent responsiveness to credit and community development needs. The bank made significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

M&T made an excellent level of qualified community development investment and grants, often in a leadership position, particularly those not routinely provided by private investors. During the current evaluation period, the bank made 226 qualified community development investments and grants totaling approximately \$246.5 million, which included 69 investments totaling \$243.8 million and 157 grants totaling \$2.7 million. This activity represented an overall annualized performance over 24 months of 34.5 investments totaling \$121.9 million and 78.5 grants totaling \$1.4 million.

The institution's qualified investments and grants by assessment area and community development purpose are summarized in the table below.

State of Maryland Rated Area Community Development Investments and Grants January 1, 2020 to December 31, 2021										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
MSA 12580 (Baltimore-Columbia-Towson, MD)	51	140,034	4	35,051	1	1,003	3	62,994	59	239,082
MSA 15680 (California-Lexington Park, MD)	1	1,806	0	0	0	0	0	0	1	1,806
MSA 25180 (Hagerstown-Martinsburg, MD-WV)	3	1,106	0	0	0	0	0	0	3	1,106
Non-Metropolitan Group A	4	1,686	0	0	0	0	0	0	4	1,686
Non-Metropolitan Group B	2	139	0	0	0	0	0	0	2	139
<b>Total Investments</b>	<b>61</b>	<b>144,771</b>	<b>4</b>	<b>35,051</b>	<b>1</b>	<b>1,003</b>	<b>3</b>	<b>62,994</b>	<b>69</b>	<b>243,819</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>157</b>	<b>2,665</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>157</b>	<b>2,665</b>
<b>Grand Total</b>	<b>61</b>	<b>144,771</b>	<b>161</b>	<b>37,716</b>	<b>1</b>	<b>1,003</b>	<b>3</b>	<b>62,994</b>	<b>226</b>	<b>246,484</b>

### Responsiveness to Credit and Community Development Needs

M&T exhibited excellent responsiveness to assessment area credit and community development needs. The majority of the bank's qualified investments primarily promoted affordable housing efforts, which was a community development need within these assessment areas. Qualified grants primarily promoted community services towards LMI individuals, which was also an identified community development need within the assessment areas.

### Community Development Initiatives

The bank made significant use of innovative and/or complex investments to support community development initiatives.

### SERVICE TEST

M&T's performance under the Service Test in the state of Maryland is rated High Satisfactory. Delivery systems were reasonably accessible to essentially all portions of the bank's geographies and individuals of different income levels in its assessment areas. The bank's record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced certain portions of its assessment areas, particularly LMI geographies and/or LMI individuals. The bank was a leader in providing community development services.

### Retail Services

#### *Accessibility of Delivery Systems*



Delivery systems were reasonably accessible to essentially all portions of the bank’s assessment areas in Maryland. Examiners based this conclusion primarily on the bank’s performance within its MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area, where 86.4% of branches and 92.4% of ATMs in this state were located.

***Changes in Branch Locations***

To the extent changes were made, the institution’s opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. M&T closed one branch in the MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area, which was in a middle-income tract; and one branch in the MSA 25180 (Hagerstown-Martinsburg, MD-WV) assessment area, in a moderate-income tract.

***Reasonableness of Business Hours and Services***

M&T’s business hours and services did not vary in a way that inconvenienced certain portions of the assessment areas, particularly LMI geographies and/or individuals.

Overall, the bank’s products and services in the Maryland assessment areas were consistent with those discussed at the institution level.

**Community Development Services**

M&T was a leader in providing community development services in its assessment areas. The bank conducted 321 qualified community service events, representing an annualized over 24 months performance of 160.5 services. The bank’s qualified community development services consisted of a wide variety of events related to financial education, technical assistance, and first-time homebuyer seminars. This was particularly notable due to the limitations for outreach and engagement presented by the COVID-19 pandemic.

The institution’s community development services by assessment area and community development purpose are summarized in the table below.

<b>State of Maryland Rated Area Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
MSA 12580 (Baltimore-Columbia-Towson, MD)	14	219	87	0	<b>320</b>
MSA 15680 (California-Lexington Park, MD)	0	0	0	0	<b>0</b>
MSA 25180 (Hagerstown-Martinsburg, MD-WV)	1	0	0	0	<b>1</b>
Non-Metropolitan Group A	0	0	0	0	<b>0</b>
Non-Metropolitan Group B	0	0	0	0	<b>0</b>
<b>Total</b>	<b>15</b>	<b>219</b>	<b>87</b>	<b>0</b>	<b>321</b>



## **METROPOLITAN AREA MSA 12580 (BALTIMORE-COLUMBIA-TOWSON, MD)— FULL REVIEW**

### **SCOPE OF EXAMINATION**

Examiners used full-scope examination procedures to evaluate the bank’s performance in this assessment area as detailed in Appendix A.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

M&T operated 89 of its 664 locations and 365 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 44 institutions operated 610 offices within this assessment area. M&T ranked 2<sup>nd</sup> with approximately \$21.9 billion in deposits, which represented 21.1% of the deposit market share and accounted for 16.9% of the bank’s total branch deposits. This assessment area generated approximately 12.9% by number and 10.1% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large institutions, such as Bank of America and PNC Bank, as well as regional banks, such as Truist Bank and Sandy Spring Bank.

### **PERFORMANCE CONTEXT**

#### *Demographic Characteristics*

The MSA 12580 (Baltimore-Columbia-Townson, MD) assessment area included Anne Arundel County, Baltimore County, Carroll County, Harford County, Howard County, Queen Anne's County, and Baltimore city. According to the 2015 ACS, the population of this assessment area was 2,769,818. The assessment area consisted of 683 census tracts, of which 89 or 13.0% were low-income, 154 or 22.5% were moderate-income, 228 or 33.4% were middle-income, 196 or 28.7% were upper-income, and 16 or 2.3% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 12580 (Baltimore-Columbia-Townson, MD) assessment area had 675,620 families, of which 22.3% were low-income (7.6% of which were below the poverty level), 17.0% were moderate-income, 19.8% were middle-income, and 40.8% were upper-income.

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

<b>MSA 12580 (Baltimore-Columbia-Townson, MD) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>

Assessment Area	\$95,915	\$104,637	9.1%
Anne Arundel County, MD	\$112,105	\$119,273	6.4%
Baltimore County, MD	\$89,951	\$97,334	8.2%
Carroll County, MD	\$110,577	\$115,452	4.4%
Harford County, MD	\$101,847	\$111,503	9.5%
Howard County, MD	\$140,400	\$148,026	5.4%
Queen Anne's County, MD	\$109,888	\$113,689	3.5%
Baltimore City, MD	\$55,756	\$64,814	16.3%
State of Maryland	\$98,429	\$105,790	7.5%

Source: 2011 - 2015 U.S. Census Bureau American Community Survey  
2016 - 2020 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

### ***Housing Characteristics***

Based on the 2015 ACS data, the MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area had 1,145,512 housing units, of which 60.0% were owner-occupied, 30.4% were rental, and 9.5% were vacant. Of the total housing units, 10.7% were located in low-income census tracts, 22.9% in moderate-income census tracts, 35.5% in middle-income census tracts, 30.6% in upper-income census tracts, and 0.3% in unknown-income census tracts. In low-income census tracts, 27.6% of housing units were owner-occupied, 47.3% were rental units, and 25.1% were vacant. In moderate-income census tracts, 45.2% of housing units were owner-occupied, 43.7% were rental units, and 11.1% were vacant.

The median age of housing stock in this assessment area was 43 years old, with 23.7% 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 2015 ACS, the median housing value in this assessment area was \$277,463 with an affordability ratio of 25.6. The median gross rent in the assessment area was \$1,151 per month.

<b>MSA 12580 (Baltimore-Columbia-Towson, MD)</b>			
<b>Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$277,463	25.6	\$1,151
Anne Arundel County, MD	\$334,100	26.9	\$1,497
Baltimore County, MD	\$246,600	27.2	\$1,163
Carroll County, MD	\$321,300	26.6	\$1,079
Harford County, MD	\$278,500	28.9	\$1,152
Howard County, MD	\$429,100	25.7	\$1,579
Queen Anne's County, MD	\$339,900	25.3	\$1,178
Baltimore City, MD	\$152,400	27.7	\$951
State of Maryland	\$286,900	26.0	\$1,230

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

### ***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 44.5% of all rental households had rental costs that exceeded 30% of their incomes, 74.9% of low-income rental households had rental costs that exceeded 30% of their income, and 42.9% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 21.2% 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 37.0% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 12580 (Baltimore-Columbia-Towson, MD)</b>						
<b>Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	74.9%	42.9%	44.5%	64.5%	37.0%	21.2%
Anne Arundel County, MD	81.8%	61.4%	43.1%	64.6%	46.2%	20.8%
Baltimore County, MD	80.7%	42.5%	45.0%	62.8%	34.8%	20.6%
Carroll County, MD	72.7%	32.9%	42.9%	57.4%	40.7%	19.1%
Harford County, MD	76.0%	41.2%	43.9%	64.7%	36.0%	19.6%
Howard County, MD	80.2%	70.4%	40.0%	79.5%	50.0%	19.4%
Queen Anne's County, MD	64.0%	60.0%	41.4%	72.4%	44.2%	24.7%
Baltimore City, MD	69.2%	28.4%	46.1%	63.9%	26.8%	25.4%
State of Maryland	77.2%	44.4%	45.2%	66.6%	39.4%	22.1%

\*Cost Burden is housing cost that equals 30% or more of household income.  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.

***Labor, Employment and Economic Characteristics***

According to D&B data, there were 128,493 businesses operating in this assessment area in 2021, of which 5.0% were located in low-income census tracts and 15.7% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.4% were small businesses with a GAR of \$1 million or less, of which 5.0% were located in low-income census tracts and 15.9% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.5% in 2019, increased to 6.5% in 2020, and decreased to 5.5% in 2021. The state of Maryland had an unemployment rate of 3.4% in 2019, increased to 6.7% in 2020, and decreased to 5.8% in 2021.

**MSA 12580 (Baltimore-Columbia-Towson, MD)**  
**Unemployment Rates**

Area	2019	2020	2021
Assessment Area	3.5%	6.5%	5.5%
Anne Arundel County, MD	2.9%	5.8%	4.7%
Baltimore County, MD	3.5%	6.8%	5.7%
Carroll County, MD	2.8%	5.1%	4.2%
Harford County, MD	3.2%	5.8%	4.8%
Howard County, MD	2.6%	5.1%	4.3%
Queen Anne's County, MD	3.0%	5.4%	4.4%
Baltimore City, MD	4.9%	8.7%	7.6%
State of Maryland	3.4%	6.7%	5.8%

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

Additional performance context data for this assessment area is provided in the following MSA 12580 (Baltimore-Columbia-Towson, MD) Assessment Area Demographics Table:

MSA 12580 (Baltimore-Columbia-Towson, MD) Assessment Area Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	89	13.0	51,583	7.6	14,975	29.0	150,619	22.3
Moderate-income	154	22.5	139,009	20.6	16,748	12.0	115,141	17.0
Middle-income	228	33.4	244,704	36.2	13,122	5.4	133,931	19.8
Upper-income	196	28.7	239,449	35.4	6,138	2.6	275,929	40.8
Unknown-income	16	2.3	875	0.1	413	47.2	0	0.0
<b>Total Assessment Area</b>	<b>683</b>	<b>100.0</b>	<b>675,620</b>	<b>100.0</b>	<b>51,396</b>	<b>7.6</b>	<b>675,620</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	122,695	33,878	4.9	27.6	58,061	47.3	30,756	25.1
Moderate-income	262,370	118,674	17.3	45.2	114,565	43.7	29,131	11.1
Middle-income	406,639	262,778	38.2	64.6	114,662	28.2	29,199	7.2
Upper-income	350,736	271,844	39.5	77.5	59,665	17.0	19,227	5.5
Unknown-income	3,072	381	0.1	12.4	1,804	58.7	887	28.9
<b>Total Assessment Area</b>	<b>1,145,512</b>	<b>687,555</b>	<b>100.0</b>	<b>60.0</b>	<b>348,757</b>	<b>30.4</b>	<b>109,200</b>	<b>9.5</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	6,457	5.0	5,868	5.0	543	5.4	46	4.8
Moderate-income	20,147	15.7	18,630	15.9	1,395	13.9	122	12.7
Middle-income	48,909	38.1	44,405	37.8	4,120	41.0	384	40.1
Upper-income	52,151	40.6	47,878	40.8	3,871	38.5	402	42.0

Unknown-income	829	0.6	699	0.6	127	1.3	3	0.3
<b>Total Assessment Area</b>	<b>128,493</b>	<b>100.0</b>	<b>117,480</b>	<b>100.0</b>	<b>10,056</b>	<b>100.0</b>	<b>957</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.4</b>		<b>7.8</b>		<b>.7</b>
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	15	1.2	15	1.2	0	0.0	0	0.0
Moderate-income	77	6.2	74	6.1	2	5.9	1	33.3
Middle-income	522	42.0	506	42.0	16	47.1	0	0.0
Upper-income	628	50.5	610	50.6	16	47.1	2	66.7
Unknown-income	1	0.1	1	0.1	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>1,243</b>	<b>100.0</b>	<b>1,206</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.0</b>		<b>2.7</b>		<b>.2</b>
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.</i>								

## Community Contact

Examiners conducted a community contact interview with a community organization that promoted economic development for LMI individuals and families in Baltimore County. This organization assists local businesses in finding site locations, provides solutions for workforce and permit issues that may arise, and helps local businesses operate the county grant and loan programs. According to the organization, local restaurants and the hospitality industry are still struggling to find employees and customers still do not patronize at prior pandemic levels. The organization identified funding and resources for small businesses as a community need. The contact believes banks are doing their fair share but would like local banks to refer their declined small business and start-ups to them because they have some loans and grants that can help.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 12580 (BALTIMORE-COLUMBIA-TOWNSON, MD)

### LENDING TEST

M&T's performance was excellent in the lending test for this assessment area. The bank's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of HMDA-related and small business loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### Lending Activity

M&T's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. M&T had a large portion of the market share of deposits in this assessment area during the evaluation period. However, the bank's HMDA market share slightly decreased, but remained in the top 20. Additionally, small business lending market share remained strong throughout the evaluation period.

In 2021, the bank ranked 2<sup>nd</sup> out of 44 institutions with a deposit market share of 21.1%. In total HMDA lending, the bank ranked 19<sup>th</sup> out of 694 reporters with a market share of 1.2%, including market shares of 0.7% in home purchase lending, 1.0% in refinance, 14.9% in home improvement, and 1.5% in multifamily loans. M&T ranked 4<sup>th</sup> out of 227 reporters with a market share of 6.9% in small business lending.

In 2020, the bank ranked 2<sup>nd</sup> out of 47 institutions with a deposit market share of 21.2%. In total HMDA lending, the bank ranked 19<sup>th</sup> out of 679 reporters with a market share of 1.2%, including market shares of 1.0% in home purchase lending, 0.9% in refinance, 14.9% home improvement, and 3.4% in multifamily loans. M&T ranked 3<sup>rd</sup> out of 234 reporters with a market share of 9.7% in small business lending.

In 2019, the bank ranked 2<sup>nd</sup> out of 50 institutions with a deposit market share of 19.3%. In total HMDA lending, the bank ranked 11<sup>th</sup> out of 645 reporters with a market share of 2.0%, including market shares of 1.0% in home purchase lending, 2.3% in refinance, 12.4% home improvement, and 2.7% in multifamily loans. M&T ranked 8<sup>th</sup> out of 174 reporters with a market share of 3.2% in small business lending.

M&T's lending in this assessment area is summarized in the table below.

<b>MSA 12580 (Baltimore-Columbia-Towson, MD)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	1,639	24.2%	138,669	7.3%
Home Purchase	1,583	23.4%	433,348	22.8%
Loan Purpose Not Applicable	524	7.7%	95,083	5.0%
Multi-Family	30	0.4%	539,095	28.4%
Refinancing	2,998	44.3%	690,713	36.4%
<b>Total HMDA</b>	<b>6,774</b>	<b>31.3%</b>	<b>1,896,908</b>	<b>57.6%</b>
<b>Total Small Business</b>	<b>14,887</b>	<b>68.7%</b>	<b>1,397,632</b>	<b>42.4%</b>
<b>Total Small Farm</b>	<b>2</b>	<b>0.0</b>	<b>650</b>	<b>0.0</b>
<b>TOTAL LOANS</b>	<b>21,663</b>	<b>100.0%</b>	<b>3,295,190</b>	<b>100.0%</b>

### **Geographic Distribution**

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout this assessment area. Lending penetration in LMI tracts was excellent for home purchase, good for refinance, good for home improvement, adequate for multifamily, and good for small business loans.

### **Gap Analysis**

M&T demonstrated a good level of dispersion in LMI census tracts in this assessment area. In 2019, the bank's performance was at 71.9% and 90.9%, in LMI census tracts, respectively, and showed an increase



in 2020, while maintaining the same level in 2021. Overall, performance in this assessment area showed improvement when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 12580 (Baltimore-Columbia-Towson, MD)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	89	25	71.9%
Moderate	154	14	90.9%
Middle	228	6	97.4%
Upper	196	2	99.0%
Income Unknown	16	9	43.8%
<b>2020</b>			
Low	89	10	88.8%
Moderate	154	7	95.5%
Middle	228	1	99.6%
Upper	196	1	99.5%
Income Unknown	16	7	56.3%
<b>2021</b>			
Low	89	10	88.8%
Moderate	154	7	95.5%
Middle	228	0	100.0%
Upper	196	1	99.5%
Income Unknown	16	6	62.5%

### ***Home Purchase Loans***

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 6.3% by number and 3.1% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 4.9% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 4.7% by number and 2.5% by dollar in low-income census tracts. In 2021, the bank made 25.0% of home purchase loans by number and 15.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 17.3% of owner-occupied housing units located in moderate-income census tracts and was above the aggregate, which made 17.7% by number and 12.4% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 7.8% by number and 3.9% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 4.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.9% by number and 2.2% by dollar in low-income census tracts. In 2020, the bank made 26.1% of home purchase loans by number and 17.5% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 17.3% of owner-occupied housing

units located in moderate-income census tracts and was significantly above the aggregate, which made 17.0% by number and 11.9% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 8.0% by number and 4.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 4.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.6% by number and 1.9% by dollar in low-income census tracts. In 2019, the bank made 23.8% of home purchase loans by number and 14.5% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 17.3% of owner-occupied housing units located in moderate-income census tracts and was above the aggregate, which made 17.4% by number and 12.0% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 2.6% by number and 1.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 4.9% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 1.9% by number and 1.0% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 17.1% by number and 11.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 17.3% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 11.9% by number and 8.2% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 2.1% by number and 1.1% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 4.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.2% by number and 0.7% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 13.6% by number and 7.1% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 17.3% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 9.2% by number and 6.4% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 3.1% by number and 1.7% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 4.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.8% by number and 0.9% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 15.5% by number and 8.4% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 17.3% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 11.5% by number and 7.8% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area.

In 2021, the bank made 1.3% by number and 0.6% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 4.9% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 1.9% by number and 1.4% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 12.1% by number and 8.2% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 17.3% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 8.6% by number and 6.2% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 1.4% by number and 0.9% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 4.9% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 1.5% by number and 1.1% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 13.0% by number and 9.6% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was slightly below the 17.3% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 8.6% by number and 7.1% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 2.8% by number and 2.0% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 4.9% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 2.2% by number and 2.0% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 15.1% by number and 10.5% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was slightly below the 17.3% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 9.7% by number and 7.6% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 25.0% by number and 0.6% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 9.5% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 15.8% by number and 4.3% by dollar of multifamily loans in low-income census tracts. In 2021, the bank did not make any multifamily loans in moderate-income census tracts.

In 2020, the bank made 7.7% by number and 2.4% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was below the 9.5% of multifamily housing units located in low-income census tracts and significantly below the aggregate, which made 20.1% by number and 7.7% by dollar of multifamily loans in low-income census tracts. In 2020, the bank made 23.1% by number and 1.5% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was below the 30.7% of

multifamily housing units located in moderate-income census tracts and similar to the aggregate, which made 24.7% by number and 22.8% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank made 11.1% by number and 0.5% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was above the 9.5% of multifamily housing units located in low-income census tracts and below the aggregate, which made 15.8% by number and 4.9% by dollar of multifamily loans in low-income census tracts. In 2019, the bank made 22.2% by number and 2.2% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was below the 30.7% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 32.0% by number and 35.4% by dollar of multi-family loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 4.6% by number and 4.8% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 5.0% of businesses located in low-income census tracts and similar to the aggregate, which made 4.7% by number and 5.1% by dollar of small business loans in low-income census tracts. In 2021, the bank made 14.9% by number and 13.5% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 15.7% of businesses located in moderate-income census tracts and similar to the aggregate, which made 15.2% by number and 13.0% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 4.2% by number and 5.3% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 5.0% of businesses located in low-income census tracts and similar to the aggregate, which made 4.1% by number and 4.4% by dollar of small business loans in low-income census tracts. In 2020, the bank made 14.1% by number and 13.3% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 15.7% of businesses located in moderate-income census tracts and similar to the aggregate, which made 13.8% by number and 12.4% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 4.2% by number and 6.6% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 4.9% of businesses located in low-income census tracts and similar to the aggregate, which made 4.1% by number and 4.6% by dollar of small business loans in low-income census tracts. In 2019, the bank made 14.4% by number and 13.0% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 15.4% of businesses located in moderate-income census tracts and similar to the aggregate, which made 13.9% by number and 12.4% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 17.6% by number and 9.9% by dollar to low-income borrowers and was slightly below the 22.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 9.9% by number and 5.5% by dollar to low-income families. The bank's lending to moderate-income borrowers was 23.9% by number and 19.7% by dollar, which was similar to the aggregate performance of 22.8% by number, similar to 17.9% by dollar, and above the 17.0% moderate-income families in the assessment area.

In 2020, the bank made 16.7% by number and 9.8% by dollar to low-income borrowers and was below the 22.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 10.4% by number and 5.8% by dollar to low-income families. The bank's lending to moderate-income borrowers was 27.3% by number and 20.3% by dollar, which was slightly above the aggregate performance of 24.6% by number, similar to 19.5% by dollar, and significantly above the 17.0% moderate-income families in the assessment area.

In 2019, the bank made 20.5% by number and 11.5% by dollar to low-income borrowers and was similar to the 22.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 10.3% by number and 5.6% by dollar to low-income families. The bank's lending to moderate-income borrowers was 22.7% by number and 19.0% by dollar, which was similar to the aggregate performance of 22.5% by number, similar to 17.5% by dollar, and above the 17.0% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 13.9% by number and 6.8% by dollar and was significantly above the aggregate lending data, at 6.3% by number and 3.5% by dollar. The bank's performance was below the 22.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 24.7% by number and 17.0% by dollar, was significantly above the aggregate lending data at 16.4% by number, above 12.0% by dollar, and above the 17.0% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 13.8% by number and 5.8% by dollar and was significantly above the aggregate lending data, at 4.5% by number and 2.4% by dollar. The bank's performance was below the 22.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.9% by number and 12.8% by dollar, was above the aggregate lending

data at 14.2% by number, slightly above 10.3% by dollar, and slightly above the 17.0% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 17.2% by number and 8.3% by dollar and was significantly above the aggregate lending data, at 7.3% by number and 3.7% by dollar. The bank's performance was slightly below the 22.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 23.7% by number and 14.7% by dollar, was significantly above the aggregate lending data at 15.0% by number, above 10.4% by dollar, and above the 17.0% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution of borrowers reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 12.6% by number and 7.2% by dollar and was significantly above the aggregate lending data, at 5.9% by number and 3.4% by dollar. The bank's performance was below the 22.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.4% by number and 11.9% by dollar, was slightly above the aggregate lending data at 14.1% by number, similar to 11.0% by dollar, and similar to the moderate-income families in the assessment area at 17.0%.

In 2020, the bank's lending to low-income borrowers was 14.0% by number and 10.7% by dollar and was significantly above the aggregate lending data, at 7.2% by number and 4.4% by dollar. The bank's performance was below the 22.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.2% by number and 13.5% by dollar, was above the aggregate lending data at 15.0% by number, slightly above 11.3% by dollar, and slightly above the moderate-income families in the assessment area at 17.0%.

In 2019, the bank's lending to low-income borrowers was 15.7% by number and 12.0% by dollar and was significantly above the aggregate lending data, at 8.7% by number and 6.0% by dollar. The bank's performance was below the 22.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 27.1% by number and 22.7% by dollar, was significantly above the aggregate lending data at 17.1% by number, significantly above 13.8% by dollar, and significantly above the moderate-income families in the assessment area at 17.0%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 31.9% of loans by number and 19.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 46.3% by number and 28.8% by dollar, in addition to being significantly below the 91.4% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 80.1% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 41.0% of loans by number and 20.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 43.1% by number and 26.7% by dollar, in addition to being significantly below the 91.4% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 74.4% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 63.1% of loans by number and 31.1% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 47.4% by number and 30.7% by dollar, in addition to being below the 91.2% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 78.1% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 66 loans for approximately \$396.0 million. The community development lending in this assessment area represented 10.0% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance of approximately \$198.0 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$72.7 million, this represented a significant improvement in performance. Additionally, based on annualized community development loans to deposits, the bank ranked 2<sup>nd</sup> out of four compared to similarly situated banks that primarily served this assessment area.

The institution's community development loans by year and purpose are summarized in the table below.

<b>MSA 12580 (Baltimore-Columbia-Towson, MD)</b>										
<b>Community Development Lending</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	7	80,851	7	144,811	2	9,084	31	70,112	<b>47</b>	<b>304,858</b>
2021	3	43,888	3	13,150	1	14,750	12	19,344	<b>19</b>	<b>91,132</b>
<b>Total</b>	<b>10</b>	<b>124,739</b>	<b>10</b>	<b>157,961</b>	<b>3</b>	<b>23,834</b>	<b>43</b>	<b>89,456</b>	<b>66</b>	<b>395,990</b>

The following are examples of community development lending which benefited the assessment area:

- In 2020 and 2021, the bank made 4 loans totaling \$64.2 million for working capital needs towards affordable housing projects. These loans support affordable housing for LMI families in the assessment area.
- In 2021, the bank made 2 loans totaling \$17.9 million for the construction of two medical buildings that will house a health center. The health center is located in an Opportunity Zone. With these loans, the bank supported economic development for LMI families in the assessment area.
- In 2020 and 2021, the bank originated 43 PPP loans in amounts greater than \$1 million, totaling approximately \$89.5 million cumulatively, to organizations in LMI census tracts, which helped to revitalize and stabilize these communities.

### **Innovative and/or Flexible Lending Practices**

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank's products and services in this assessment area were consistent with those discussed at the institution level.

Additionally, in this assessment area, the bank offered a loan program with Healthy Neighborhoods, Inc. This program provided borrowers with below-market permanent financing if they are purchasing, refinancing, or renovating in a targeted neighborhood in the city of Baltimore.

### **INVESTMENT TEST**

M&T's performance was excellent in the investment test for this assessment area. The bank made an excellent level of qualified community development investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited excellent responsiveness to credit and community economic development needs. The bank made significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank made an excellent level of qualified community development investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 202 qualified investments and grants totaling \$241.7 million in this assessment area, which included 13 new investments totaling \$110.9 million, 46 prior period investments with a current balance of \$128.2 million, and 143 grants totaling \$2.6 million. The community development activity in this assessment area represented 18.6% by dollar volume of the bank's total community development investments and grants across all assessment areas. On an annualized basis, qualified investments significantly increased since prior evaluation, with \$120.8 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$25.1 million in annualized qualified investments and grants at the previous evaluation. Additionally, based on annualized investments and grants to deposits, the bank ranked 1<sup>st</sup> out of four compared to similarly situated banks that primarily served this assessment area.

The bank's qualified investments and grants by year and purpose are summarized in the table below.



<b>MSA 12580 (Baltimore-Columbia-Towson, MD)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	41	87,634	2	11,551	1	1,003	2	27,994	<b>46</b>	<b>128,182</b>
2020	7	26,281	0	0	0	0	1	35,000	<b>8</b>	<b>61,281</b>
2021	3	26,119	2	23,500	0	0	0	0	<b>5</b>	<b>49,619</b>
<b>Total Investments</b>	<b>51</b>	<b>140,034</b>	<b>4</b>	<b>35,051</b>	<b>1</b>	<b>1,003</b>	<b>3</b>	<b>62,994</b>	<b>59</b>	<b>239,082</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>143</b>	<b>2,607</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>143</b>	<b>2,607</b>
<b>Grand Total</b>	<b>51</b>	<b>140,034</b>	<b>147</b>	<b>37,658</b>	<b>1</b>	<b>1,003</b>	<b>3</b>	<b>62,994</b>	<b>202</b>	<b>241,689</b>

The following are examples of community development investments and grants that benefited this assessment area:

- In 2020, the bank invested a total of \$3.2 million in four CRA qualified investment funds. The fund contained a mix of high credit quality bonds across multiple sectors of the bond market, while still meeting community development objectives. The investments had a qualified purpose of affordable housing for LMI communities.
- In 2021, the bank made 3 investments totaling \$26.1 million, that were used to build properties that qualified for LIHTC. LIHTC is a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments, the bank supported affordable housing for LMI individuals.
- In 2020 and 2021, the bank provided 2 grants totaling \$161,300 to an organization that delivers community programs to students. The majority of the students served come from underserved schools and LMI communities.

### **Responsiveness to Credit and Community Development Needs**

The bank exhibited excellent responsiveness to credit and community economic development needs. Of the bank's new qualified investments, 76.9% primarily promoted affordable housing efforts, and 15.4% provided community services, which are community development needs within this assessment area. Qualified grants promoted community services towards LMI individuals.

### **Community Development Initiatives**

The bank made significant use of innovative and/or complex investments to support community development initiatives. The bank's new investments, consisted of LIHTC, CRA qualified investment funds, new market tax credits, and an investment pool. Prior period investments consisted primarily of LIHTC and mortgage-backed securities.

### **SERVICE TEST**

M&T's performance was good in the service test for this assessment area. Delivery systems were reasonably accessible to essentially all portions of the institution's assessment area, including LMI areas. To the extent changes were made, the institution's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. The bank was a leader in providing community development services.

## **Retail Services**

### ***Accessibility of Delivery Systems***

Delivery systems were reasonably accessible to essentially all portions of the institution's assessment area, including LMI areas. M&T operated 89 full-service branches in this assessment area, of which 21 (23.6%) were in LMI census tracts. The bank maintained a total of 365 ATMs, 1 cash-only ATM at one branch location, 1 full-service ATM at 16 branch locations, 2 full-service ATMs at 45 branch locations, 3 full-service ATMs at 26 branch locations, 7 full-service ATMs at one branch location, and 173 offsite ATMs, of which 108 (29.6%) were in LMI census tracts. The bank's branch percentage was lower than both the percentage of LMI census tracts in this MSA (35.6%) and the percentage of the population residing in LMI census tracts (31.0%). The bank's ATM percentage was lower than the percentage of LMI census tracts in this MSA and similar to the percentage of the population residing in LMI census tracts.

### ***Changes in Branch Locations***

To the extent changes were made, the institution's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Although there was one closed branch and one relocated branch during the evaluation period, both branches were located in middle-income census tracts.

### ***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. Extended hours were offered in 79 (88.8%) branches, including 21 (100.0%) in LMI census tracts; 71 (79.8%) branches offered weekend hours, including 21 (100.0%) in LMI census tracts; and 61 (68.5%) branches, including 17 (80.9%) branches in LMI census tracts, offered drive-thru hours.

The bank's products and services in this assessment area were consistent with those discussed at the state level.

## **Community Development Services**

M&T was a leader in providing community development services. The bank conducted 322 services during the evaluation period that primarily addressed community services and economic development. This activity accounted for 20.3% of the bank's total number of community development services activity. On an annualized basis over 24 months, this represented a decrease as the bank conducted 161.0 community development services, compared to the previous evaluation's annualized performance of 274.8 community development services. The bank had 1,039 hours during the evaluation period, which on an annualized basis was 519.5 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 12580 (Baltimore-Columbia-Towson, MD)</b>					
<b>Community Development Services</b>					
<b>January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	5	51	19	0	<b>75</b>
2021	9	170	68	0	<b>247</b>
<b>Total</b>	<b>14</b>	<b>221</b>	<b>87</b>	<b>0</b>	<b>322</b>

The following are examples of community development services that benefited this assessment area:

- In 2020 and 2021, 19 bank employees served on the board of organizations dedicated to providing various services to LMI individuals. The organizations provided health care, community improvement, youth development, education and human services to underprivileged populations within the assessment area.
- In 2020 and 2021, two bank employees sponsored or presented at several workshops and seminars held by organizations that provide financial literacy, home lending education, and home counseling services to LMI individuals.

## METROPOLITAN AREA

### MSA 15680 (CALIFORNIA-LEXINGTON PARK, MD)-- LIMITED REVIEW

#### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 1 of its 664 locations and 1 of its 1,882 ATMs in this assessment area. These branches generated \$55.8 million in deposits which accounted for 0.04% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.07% by number and 0.04% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southern Maryland, the assessment area consisted of the entire MSA, comprises of St. Mary's County. The principal city in the assessment area was Charlotte, MD.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 15680 (California-Lexington Park, MD) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	#	%		
Low Income	1	5.6%	2.7%	20.1%
Moderate Income	3	16.7%	8.6%	16.9%
Middle Income	10	55.6%	67.7%	24.6%
Upper Income	3	16.7%	21.0%	38.3%
Unknown	1	5.6%	0.0%	0.0%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 15680 (California-Lexington Park, MD)	Below	Consistent	Below

M&T's lending test performance in this assessment area was below the state of Maryland performance, as lending activity was adequate, borrower distribution was adequate, and geographic distribution was poor. There were no community development loans during the evaluation period.

Investment test performance was consistent with the state of Maryland performance. The bank had a total of one investment totaling \$1.8 million, which was a prior period investment. The bank did not have any grants or donations in this assessment area.

Service test performance was below the state of Maryland performance. The bank's one branch and ATM were not located in LMI tracts. There were no community development services during the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA

### MSA 25180 (HAGERSTOWN-MARTINSBURG, MD)-- LIMITED REVIEW

#### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 8 of its 664 locations and 15 of its 1,882 ATMs in this assessment area. These branches generated \$581.0 million in deposits which accounted for 0.4% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.7% by number and 0.4% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in western Maryland, the assessment area consisted of part of the MSA, including all of Washington County and excluded Berkeley and Morgan Counties. The principal cities in the assessment area were Hagerstown and Boonsboro, MD, both of which were located in Washington County.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 25180 (Hagerstown-Martinsburg, MD) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	2	6.3%	1.6%	20.1%
Moderate Income	7	21.9%	12.9%	16.1%
Middle Income	15	46.9%	50.7%	22.0%
Upper Income	7	21.9%	34.8%	41.8%
Unknown	1	3.1%	0.0%	0.0%
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 25180 (Hagerstown-Martinsburg, MD)	Consistent	Consistent	Below

M&T's lending test performance in this assessment area was consistent with the state of Maryland performance, as lending activity, borrower distribution, and geographic distribution were good. The bank made 5 qualified community development loans totaling \$21.2 million in this assessment area.

Investment test performance was consistent with the state of Maryland performance. The bank had a total of 3 investments totaling \$1.1 million, which consisted of prior period investments. The bank also made 12 grants and donations totaling \$48,000.

Service test performance was below the state of Maryland performance. The bank operated 3 (37.5%) of its branches and 7 (46.7%) ATMs in the assessment area in LMI census tracts. The bank closed one branch location in a moderate-income tract. In addition, the bank had one instance, totaling six hours of community development service in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## NON-METROPOLITAN GROUP A, MARYLAND-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 3 of its 664 locations and 9 of its 1,882 ATMs in this assessment area. These branches generated \$172.5 million in deposits which accounted for 0.1% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.3% by number and 0.2% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southeast Maryland, the assessment area consisted of all of Caroline, Dorchester, and Talbot Counties. The principal cities in the assessment area were Cambridge, Easton and Denton, MD, which were located in Dorchester, Caroline, and Talbot Counties, respectively.

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group A, Maryland Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	1	3.3%	1.6%	21.7%
Moderate Income	5	16.7%	13.9%	16.0%
Middle Income	17	56.7%	65.9%	21.3%
Upper Income	5	16.7%	18.7%	41.0%
Unknown	2	6.7%	0.0%	0.0%
<b>Total</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group A, Maryland	Consistent	Consistent	Below

M&T's lending test performance in the assessment area was consistent with the state of Maryland performance, as lending activity was adequate, borrower distribution was good, and geographic distribution was adequate. The bank made 2 community development loans totaling \$5.8 million in this assessment area during the evaluation period.

Investment test performance was consistent with the state of Maryland performance. The bank had a total of 4 investments totaling \$1.7 million which consisted of prior period investments. The bank also made 2 grants and donations totaling \$10,000.

Service test performance was below the state of Maryland performance. The bank operated two (66.7%) of its branches and three (33.3%) ATMs in the assessment area in LMI census tracts. The bank did not have any community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## NON-METROPOLITAN GROUP B, MARYLAND-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T operated 2 of its 664 locations and 4 of its 1,882 ATMs in this assessment area. These branches generated \$111.2 million in deposits which accounted for 0.1% of the bank's total branch deposits as of June 30, 2021. This assessment area generated approximately 0.2% by number and 0.1% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in northwest Maryland, this assessment area consisted of the entire Garrett County. The principal cities in this assessment area were Grantsville and Oakland, MD.

Key demographics for this assessment area are listed on the chart below:

<b>Non-MSA Group B, MD Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0.0%	0.0%	21.5%
Moderate Income	1	14.3%	12.1%	24.0%
Middle Income	6	85.7%	87.9%	20.3%
Upper Income	0	0.0%	0.0%	34.2%
Unknown	0	0.0%	0.0%	0.0%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Non-MSA Group B, MD	Below	Below	Below

M&T's lending test performance in this assessment area was below the state of Maryland performance, as lending activity, borrower distribution, and geographic distribution were adequate. There were no community development loans for the evaluation period.

Investment test performance was below the state of Maryland performance. The bank had a total of two investments totaling \$139,000, which consisted of prior period investments. M&T did not have any grants or donations in this assessment area.

Service test performance was below the state of Maryland performance. There were no branches or ATMs located in LMI census tracts. The bank did not have any community development services in this assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.



## STATE OF FLORIDA

### CRA RATING FOR FLORIDA: SATISFACTORY

*The Lending Test is rated: Low Satisfactory*

*The Investment Test is rated: High Satisfactory*

*The Service Test is rated: Needs to Improve*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses.
- Made an adequate level of community development loans.
- Used innovative and/or flexible lending practices in serving assessment area credit needs.

#### INVESTMENT TEST

- Made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Occasionally used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were accessible to limited portions of the bank's assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services varied in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided a limited level of community development services.

## SCOPE OF EXAMINATION

Examiners conducted a full-scope review of the following assessment area in the state of Florida:

1. MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)

In order to derive the state rating, the full-scope assessment areas were weighted based on the proportion of loan originations, deposits, and branches in each area. M&T's full-scope area made up 86.7% by number and 94.5% by dollar volume of the total lending activity; 100.0% of the deposits; and 33.3% of the ATMs in the state of Florida.

Additionally, limited-scope reviews were conducted in the remaining Florida assessment areas:

1. MSA 38940 (Port St. Lucie, FL)
2. MSA 42680 (Sebastian-Vero Beach, FL)

## DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T did not operate any of its 664 branch locations and operated 6 of its 1,882 ATMs in the state of Florida. This rated area generated approximately 0.2% by number and 1.3% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. According to the June 30, 2021 FDIC Summary of Deposit Report, M&T held approximately \$145.5 million in deposits in the state of Florida rated area, which accounted for 0.1% of the bank's total deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF FLORIDA

### LENDING TEST

M&T's Lending Test performance in the state of Florida is rated Low Satisfactory. Lending levels reflected adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflected adequate penetration throughout the assessment area. The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes. The bank exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses. The bank made an adequate level of community development loans. The bank used innovative and/or flexible lending practices in serving assessment area credit needs.

### Lending Activity

M&T's lending activity demonstrated adequate responsiveness to the retail credit needs of the assessment areas in this state. This conclusion was primarily based on the bank being adequately responsive in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area.

The bank's lending in this state is summarized in the table below.

<b>Summary of Lending Activity in State of Florida January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	20	6.8%	9,981	2.6%
Home Purchase	100	34.1%	57,783	14.8%

Loan Purpose Not Applicable	68	23.2%	15,075	3.9%
Multi-Family	6	2.0%	240,287	61.4%
Refinancing	99	33.8%	68,020	17.4%
<b>Total HMDA</b>	<b>293</b>	<b>80.9%</b>	<b>391,146</b>	<b>94.8%</b>
<b>Total Small Business</b>	<b>69</b>	<b>19.1%</b>	<b>21,611</b>	<b>5.2%</b>
<b>TOTAL LOANS</b>	<b>362</b>	<b>100.0%</b>	<b>412,757</b>	<b>100.0%</b>

### Geographic Distribution

The geographic distribution of loans reflected adequate penetration within the state of Florida. Examiners based this conclusion on the distribution of loans in the LMI census tracts. The performance under the Geographic Distribution criterion was generally consistent for the assessment areas within the rated area. For details, please refer to the Geographic Distribution of Loans section for each full-scope assessment area.

### Borrower Distribution

The distribution of borrowers reflected, given the product lines offered by the institution, poor penetration among retail customers of different income levels and among business customers of different sizes throughout the state of Florida. Examiners based this conclusion on the percentage of loans to LMI borrowers. The performance under the Borrower Distribution criterion was generally consistent for the assessment areas within the rated area. For details, please refer to the Borrower Distribution section for each full-scope assessment area.

### Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment areas in this state, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T made an adequate level of community development loans in the state of Florida. This conclusion was primarily based on the bank making an adequate level of community development loans in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area. The community development lending in this rated area represented 2.4% of the bank's total dollar volume of community development lending.

The bank originated 6 qualified community development loans totaling approximately \$95.1 million, across the state of Florida. This lending level represented an annualized performance over 24 months of approximately \$47.6 million.

The community development lending activity by assessment area for each community development purpose is summarized in the table below.

State of Florida Rated Area Community Development Lending January 1, 2020 to December 31, 2021										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	0	0	0	0	0	0	1	3,466	1	3,466
MSA 38940 (Port St. Lucie, FL)	0	0	0	0	0	0	0	0	0	0
MSA 42680 (Sebastian-Vero Beach, FL)	0	0	0	0	0	0	0	0	0	0
BSRA	5	91,655	0	0	0	0	0	0	5	91,655
<b>Total</b>	<b>5</b>	<b>91,655</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>3,466</b>	<b>6</b>	<b>95,121</b>

### Innovative and/or Flexible Lending Practices

The bank used innovative and/or flexible lending practices in order to serve assessment area credit needs in this state. The bank’s products and services in the state of Florida were consistent with those discussed at the institution level.

### INVESTMENT TEST

M&T’s performance under the investment test in the state Florida is rated High Satisfactory. The bank had a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors. The bank exhibited adequate responsiveness to credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

During the evaluation period, M&T made 57 qualified community development investments and grants totaling approximately \$15.8 million, which included three investments totaling \$15.4 million and 44 grants totaling \$371,000. For investments, this activity represented an overall annualized performance over 24 months of 1.5 investments totaling \$7.7 million. The annualized performance for grants included 22 grants totaling \$185,500.

The institution’s qualified investments and grants by assessment area and community development purpose are summarized in the table below.

State of Florida Rated Area Community Development Investments and Grants January 1, 2020 to December 31, 2021										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)

MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	1	13,266	0	0	1	2,005	0	0	2	15,271
MSA 38940 (Port St. Lucie, FL)	0	0	0	0	0	0	0	0	0	0
MSA 42680 (Sebastian-Vero Beach, FL)	0	0	0	0	0	0	0	0	0	0
BSRA	0	0	0	0	1	173	0	0	1	173
<b>Investments Total</b>	<b>1</b>	<b>13,266</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2,178</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>15,444</b>
<b>Grants Total</b>	<b>0</b>	<b>0</b>	<b>44</b>	<b>371</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>44</b>	<b>371</b>
<b>Grand Total</b>	<b>1</b>	<b>13,266</b>	<b>44</b>	<b>371</b>	<b>2</b>	<b>2,178</b>	<b>0</b>	<b>0</b>	<b>47</b>	<b>15,815</b>

### Responsiveness to Credit and Community Development Needs

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank's qualified investments primarily promoted affordable housing and economic development efforts, which were community development needs within these assessment areas. Qualified grants primarily promoted community services towards LMI individuals, which was also an identified community development need within the assessment areas.

### Community Development Initiatives

The bank occasionally used innovative and/or complex investments to support community development initiatives.

### SERVICE TEST

M&T's performance under the Service Test in the state of Florida is rated Needs to Improve. Delivery systems were accessible to limited portions of the assessment area. The bank's record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services varied in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals. The bank provided a limited level of community development services.

### Retail Services

#### *Accessibility of Delivery Systems*

Delivery systems were accessible to limited portions of the bank's assessment areas in Florida. Since the bank did not have any branches in Florida, examiners based this conclusion primarily on the bank's ATM performance within MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL), MSA 38940 (Port St. Lucie, FL), and MSA 42680 (Sebastian-Vero Beach, FL) assessment areas, where all of the bank's ATMs in this state were located.

#### *Changes in Branch Locations*

To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect its accessibility of delivery systems, particularly in LMI areas. No branches were opened, closed, or relocated in any of the state of Florida assessment areas.

***Reasonableness of Business Hours and Services***

M&T’s business hours and services varied in a way that inconvenienced certain portions of the assessment area, particularly LMI tracts and/or individuals.

Overall, the bank’s products in the Florida assessment areas were consistent with those discussed at the institution level.

**Community Development Services**

M&T provided a limited level of community development services in its assessment areas in the state of Florida. The bank conducted 3 qualified community service events, representing an overall annualized performance over 24 months of 1.5 services. The bank’s qualified community development services consisted of events related to financial education. This decrease can be partially attributed to the limitations for outreach and engagement presented by the COVID-19 pandemic.

The institution’s community development services by assessment area and community development purpose are summarized in the table below.

State of Florida Rated Area Community Development Services January 1, 2020 to December 31, 2021					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	0	1	0	0	<b>1</b>
MSA 38940 (Port St. Lucie, FL)	0	0	0	0	<b>0</b>
MSA 42680 (Sebastian-Vero Beach, FL)	0	2	0	0	<b>2</b>
<b>Total</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>3</b>

## METROPOLITAN AREA MD 48424 (WEST PALM BEACH-BOCA RATON- BOYNTON BEACH, FL)-- FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank's performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T did not have any branches operating and had 2 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 49 institutions operated 409 offices within this assessment area. M&T ranked 30<sup>th</sup> with approximately \$145.5 million in deposits, which represented 0.2% of the deposit market share and accounted for 0.1% of the bank's total branch deposits. This assessment area generated approximately 0.2% by number and 1.2% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large institutions, such as Wells Fargo and Bank of America, as well as regional banks, such as Truist Bank and First Republic Bank.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area was comprised of Palm Beach County. According to the 2015 ACS, the population of this assessment area was 1,378,806. The assessment area consisted of 338 census tracts, of which 26 or 7.7% were low-income, 94 or 27.8% were moderate-income, 92 or 27.2% were middle-income, 115 or 34.0% were upper-income, and 11 or 3.3% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area had 332,725 families, of which 22.8% were low-income (10.5% of which were below the poverty level), 17.3% were moderate-income, 17.8% were middle-income, and 42.1% were upper-income.

The FFIEC median family incomes for the counties comprising the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) as of the 2015 ACS were as follows:

<b>MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$72,016	\$79,785	10.8%
Palm Beach County, FL	\$72,016	\$79,785	10.8%
State of Florida	\$62,828	\$69,670	10.9%

Source: 2011 - 2015 U.S. Census Bureau American Community Survey  
2016 - 2020 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

### Housing Characteristics

Based on the 2015 ACS, the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area had 671,317 housing units, of which 55.0% were owner-occupied, 24.6% were rental, and 20.4% were vacant. Of the total housing units, 6.0% were located in low-income census tracts, 27.5% in moderate-income census tracts, 30.4% in middle-income census tracts, 35.8% in upper-income census tracts, and 0.3% in unknown-income census tracts. In low-income census tracts, 29.0% of housing units were owner-occupied, 50.6% were rental units, and 20.4% were vacant. In moderate-income census tracts, 46.7% of housing units were owner-occupied, 32.0% were rental units, and 21.3% were vacant.

The median age of housing stock in this assessment area was 31 years old, with 3.1% of the stock built before 1950. The median age of housing stock was 43 years in low-income tracts and 42 years in moderate-income tracts. According to the 2015 ACS, the median housing value in this assessment area was \$204,663 with an affordability ratio of 26.1. The median gross rent in the assessment area was \$1,169 per month.

MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) Housing Characteristics			
Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$204,663	26.1	\$1,169
Palm Beach County, FL	\$204,663	26.1	\$1,169
State of Florida	\$159,000	29.9	\$1,002

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

### Housing Cost Burden

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 54.1% of all rental households had rental costs that exceeded 30% of their incomes, 83.5% of low-income rental households had rental costs that exceeded 30% of their income, and 65.3% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 28.4% of homeowners had housing costs that exceeded 30% of their incomes, 68.5% of low-income homeowners had housing costs that exceeded 30% of their income, and 40.6% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) Housing Cost Burden*						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	83.5%	65.3%	54.1%	68.5%	40.6%	28.4%
Palm Beach County, FL	83.5%	65.3%	54.1%	68.5%	40.6%	28.4%
State of Florida	80.5%	60.2%	50.5%	61.8%	36.3%	24.1%

\*Cost Burden is housing cost that equals 30% or more of household income



Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 136,267 businesses operating in this assessment area in 2021, of which 5.5% were located in low-income census tracts and 21.2% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 94.0% were small businesses with a GAR of \$1 million or less, of which 5.3% were located in low-income census tracts and 21.2% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.4% in 2019, increased to 8.2% in 2020, and decreased to 4.3% in 2021. The state of Florida had an unemployment rate of 3.2% in 2019, increased to 8.2% in 2020, and decreased to 4.6% in 2021.

<b>MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.4%	8.2%	4.3%
Palm Beach County, FL	3.4%	8.2%	4.3%
State of Florida	3.2%	8.2%	4.6%

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

Additional performance context data for this assessment area is provided in the following MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) Assessment Area Demographics Table:

<b>MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)</b>								
<b>Assessment Area Demographics</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Low-income</b>	26	7.7	19,292	5.8	7,117	36.9	75,778	22.8
<b>Moderate-income</b>	94	27.8	82,482	24.8	14,460	17.5	57,664	17.3
<b>Middle-income</b>	92	27.2	104,384	31.4	7,979	7.6	59,302	17.8
<b>Upper-income</b>	115	34.0	125,809	37.8	5,343	4.2	139,981	42.1
<b>Unknown-income</b>	11	3.3	758	0.2	99	13.1	0	0.0
<b>Total Assessment Area</b>	338	100.0	332,725	100.0	34,998	10.5	332,725	100.0
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		<b>#</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Low-income</b>	40,022	11,598	3.1	29.0	20,247	50.6	8,177	20.4
<b>Moderate-income</b>	184,776	86,275	23.3	46.7	59,215	32.0	39,286	21.3
<b>Middle-income</b>	204,366	120,910	32.7	59.2	49,258	24.1	34,198	16.7
<b>Upper-income</b>	240,165	149,887	40.6	62.4	35,765	14.9	54,513	22.7
<b>Unknown-income</b>	1,988	851	0.2	42.8	599	30.1	538	27.1
<b>Total Assessment Area</b>	671,317	369,521	100.0	55.0	165,084	24.6	136,712	20.4

	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
	<b>Low-income</b>	7,463	5.5	6,835	5.3	551	8.4	77
<b>Moderate-income</b>	28,890	21.2	27,211	21.2	1,459	22.3	220	13.8
<b>Middle-income</b>	41,171	30.2	39,099	30.5	1,670	25.6	402	25.3
<b>Upper-income</b>	57,850	42.5	54,215	42.3	2,757	42.2	878	55.2
<b>Unknown-income</b>	893	0.7	781	0.6	98	1.5	14	0.9
<b>Total Assessment Area</b>	136,267	100.0	128,141	100.0	6,535	100.0	1,591	100.0
	Percentage of Total Businesses:		94.0		4.8		1.2	
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
	<b>Low-income</b>	33	3.7	27	3.2	6	15.4	0
<b>Moderate-income</b>	110	12.3	102	11.9	8	20.5	0	0.0
<b>Middle-income</b>	301	33.6	294	34.3	7	17.9	0	0.0
<b>Upper-income</b>	447	49.9	429	50.1	18	46.2	0	0.0
<b>Unknown-income</b>	5	0.6	5	0.6	0	0.0	0	0.0
<b>Total Assessment Area</b>	896	100.0	857	100.0	39	100.0	0	.0
	Percentage of Total Farms:		95.6		4.4		.0	

2021 FFIEC Census Data and 2021 Dun and Bradstreet Information

### Community Contact

Examiners conducted a community contact interview with one community organization that served this assessment area. The contact was held with one of the largest non-profit service providers in South Florida that helped over 35,000 individuals a year through its multi-service programs. The organization had seen a significant increase in demand in hunger relief services, especially from the working poor because they were living in an area with a high cost of living. The contact believed inflation had a bigger impact on driving requests for assistance than COVID-19. The reduction in pandemic support had a compounding effect on food and living expenses, and local food pantries saw a surge in demand last year. South Florida had a lot of service workers in supermarkets, gas stations, hospitality, etc. but wages have not kept up with living expenses, and the discrepancy has only been exacerbated by the pandemic and inflation. The organization explained there is not enough affordable housing for people in the service industry and housing costs continued to increase. The organization explained that their clients were underserved in part due to the lack of products and services to meet their needs, familiarity with what banks could offer, and bad perception of banks. According to the organization, it seemed like banks are much more focused on high-end clients than serve the underserved communities.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD 48424 (WEST PALM BEACH-BOCA RATON-BOYNTON BEACH, FL)

### LENDING TEST

M&T's performance was adequate in the lending test for this assessment area. The bank's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected adequate penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes. The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank made an adequate level of community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### Lending Activity

M&T's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. M&T's market share of deposits was generally stable during the evaluation period. The bank's HMDA market share remained the same each year; however, small business market share fluctuated, and the bank's rank decreased each year as noted below.

In 2021, the bank ranked 30<sup>th</sup> out of 49 institutions with a deposit market share of 0.2%. In total HMDA lending, the bank ranked 112<sup>th</sup> out of 950 reporters with a market share of 0.1%, including market shares of 0.1% in home purchase lending, 0.1% in refinance, 0.3% in home improvement, and 0.0% in multifamily loans. M&T ranked 74<sup>th</sup> out of 263 reporters with a market share of 0.02% in small business lending.

In 2020, the bank ranked 30<sup>th</sup> out of 50 institutions with a deposit market share of 0.2%. In total HMDA lending, the bank ranked 112<sup>th</sup> out of 923 reporters with a market share of 0.1%, including market shares of 0.1% in home purchase lending, 0.1% in refinance, 0.1% home improvement, and 0.0% in multifamily loans. M&T ranked 67<sup>th</sup> out of 299 reporters with a market share of 0.05% in small business lending.

In 2019, the bank ranked 35<sup>th</sup> out of 52 institutions with a deposit market share of 0.2%. In total HMDA lending, the bank ranked 105<sup>th</sup> out of 829 reporters with a market share of 0.1%, including market shares of 0.1% in home purchase lending, 0.1% in refinance, 0.2% home improvement, and 2.9% in multifamily loans. M&T ranked 64<sup>th</sup> out of 157 reporters with a market share of 0.02% in small business lending.

M&T's lending in this assessment area is summarized in the following table:

<b>MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	15	6.0%	7,781	2.1%
Home Purchase	80	32.0%	50,631	13.6%
Loan Purpose Not Applicable	66	26.4%	14,700	4.0%
Multi-Family	6	2.4%	240,287	64.7%
Refinancing	83	33.2%	57,896	15.6%
<b>Total HMDA</b>	<b>250</b>	<b>79.6%</b>	<b>371,295</b>	<b>95.1%</b>
<b>Total Small Business</b>	<b>64</b>	<b>20.4%</b>	<b>18,966</b>	<b>4.9%</b>
<b>TOTAL LOANS</b>	<b>314</b>	<b>100.0%</b>	<b>390,261</b>	<b>100.0%</b>

### Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout the MSA 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) assessment area. Lending penetration in LMI tracts was poor for home purchase, adequate for refinance, very poor for home improvement, good for multifamily, and good for small business loans.

**Gap Analysis**

M&T demonstrated a poor level of dispersion in LMI census tracts in this assessment area. In 2019, the bank's performance was at 3.8% and 9.6%, in low-income and moderate-income census tracts, respectively, and increased in 2020, while experiencing a slight decline in 2021. Overall, performance in this assessment area showed improvement when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	26	25	3.8%
Moderate	94	85	9.6%
Middle	92	78	15.2%
Upper	115	91	20.9%
Income Unknown	11	11	0.0%
<b>2020</b>			
Low	26	21	19.2%
Moderate	94	75	20.2%
Middle	92	62	32.6%
Upper	115	70	39.1%
Income Unknown	11	9	18.2%
<b>2021</b>			
Low	26	22	15.4%
Moderate	94	82	12.8%
Middle	92	63	31.5%
Upper	115	77	33.0%
Income Unknown	11	10	9.1%

**Home Purchase Loans**

The geographic distribution of home purchase loans reflected poor penetration throughout the assessment area.

In 2021, the bank did not make any home purchase loans in low-income census tracts. The bank made 3.7% of home purchase loans by number and 0.4% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly below the 23.3% of owner-occupied housing units located in moderate-income census tracts and was significantly below the aggregate, which made 23.7% by number and 14.4% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank did not make any home purchase loans in low-income census tracts. The bank made 19.4% of home purchase loans by number and 13.4% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly below the 23.3% of owner-occupied housing units located in moderate-income census tracts and was slightly below the aggregate, which made 22.5% by number and 14.8% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank did not make any home purchase loans in low-income census tracts. The bank made 17.6% of home purchase loans by number and 5.9% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly below the 23.3% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 23.7% by number and 15.8% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 2.7% by number and 0.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was slightly below the 3.1% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 1.7% by number and 1.0% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 10.8% by number and 3.8% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 23.3% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 16.6% by number and 11.3% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 3.6% by number and 0.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was slightly above the 3.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.4% by number and 0.9% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 3.6% by number and 0.6% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 23.3% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 14.8% by number and 10.7% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank did not make any refinance loans in low-income census tracts. The bank made 5.6% by number and 1.0% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 23.3% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 17.2% by number and 11.1% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected very poor penetration throughout the assessment area. The bank made no loans in LMI census tracts in 2021, 2020 or 2019.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected good penetration throughout the assessment area.

In 2021, the bank made 50.0% by number and 60.8% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 6.5% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 20.2% by number and 10.2% by dollar of multifamily loans in low-income census tracts. In 2021, the bank made 50.0% by number and 39.2% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 35.2% of multifamily housing units located in moderate-income census tracts and slightly above the aggregate, which made 44.0% by number and 31.5% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank did not make any multifamily loans in LMI census tracts.

In 2019, the bank made 25.0% by number and 11.8% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 6.5% of multifamily housing units located in low-income census tracts and slightly above the aggregate, which made 20.2% by number and 11.1% by dollar of multifamily loans in low-income census tracts. In 2019, the bank made 25.0% by number and 7.8% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was below the 35.2% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 46.2% by number and 40.2% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 5.0% by number and 11.7% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 5.5% of businesses located in low-income census tracts and slightly below the aggregate, which made 5.8% by number and 7.4% by dollar of small business loans in low-income census tracts. In 2021, the bank made 35.0% by number and 34.4% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly above the 21.2% of businesses located in moderate-income census tracts and significantly above the aggregate, which made 23.3% by number and 23.6% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 6.1% by number and 5.9% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly above the 5.5% of businesses located in low-income census tracts and similar to the aggregate, which made 5.9% by number and 7.8% by dollar of small business loans in low-income census tracts. In 2020, the bank made 48.5% by number and 49.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly above the 21.2% of businesses located in moderate-income census tracts and significantly above the aggregate, which made 21.7% by number and 22.7% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank did not make any small business loans in low-income census tracts. The bank made 72.7% by number and 80.5% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly above the 20.9% of businesses located in moderate-income census tracts and significantly above the aggregate, which made 21.9% by number and 21.3% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was poor and lending to businesses with gross annual revenues of \$1 million or less was adequate.

### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, poor penetration among low-income customers and poor penetration among moderate-income customers for home purchase lending.

In 2021, the bank did not make any loans to low-income borrowers. The bank's lending to moderate-income borrowers was 3.7% by number and 0.7% by dollar, which was significantly below the aggregate performance of 14.3% by number, significantly below 7.5% by dollar, and significantly below the 17.3% moderate-income families in the assessment area.

In 2020, the bank did not make any loans to LMI borrowers.

In 2019, the bank made 5.9% by number and 2.5% by dollar to low-income borrowers and was significantly below the 22.8% of low-income families in the assessment area. Performance was above aggregate lending, which made 4.0% by number and 1.8% by dollar to low-income families. The bank did not make any loans to moderate-income borrowers.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, poor penetration among low-income customers and adequate penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 5.4% by number and 1.5% by dollar and was above the aggregate lending data, at 3.9% by number and 1.9% by dollar. The bank's performance was significantly below the 22.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 13.5% by number and 4.3% by dollar, was similar to the aggregate lending data at 13.4% by number, and below 7.7% by dollar, and slightly below the 17.3% moderate-income families in the assessment area.

In 2020, the bank did not make any loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 7.1% by number and 2.2% by dollar, was below the aggregate lending data at 11.8% by number, significantly below 6.9% by dollar, and significantly below the 17.3% moderate-income families in the assessment area.

In 2019, the bank did not make any loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 16.7% by number and 2.6% by dollar, was above the aggregate lending data at 13.0% by number, significantly below 7.1% by dollar, and similar to the 17.3% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, poor penetration among low-income customers and poor penetration among moderate-income customers for home improvement lending.

In 2021, the bank made no loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 12.5% by number and 3.8% by dollar, was above the aggregate lending data at 9.3% by number, slightly below 4.9% by dollar, and below the moderate-income families in the assessment area at 17.3%.

In 2020 and 2019, the bank made no loans to LMI borrowers.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among customers for small business lending.

In 2021, the bank originated 15.0% of loans by number and 3.1% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the aggregate lending data, at 43.6% by number and 25.0% by dollar, in addition to being significantly below the 94.0% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 40.0% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 33.3% of loans by number and 25.0% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 41.9% by number and 25.4% by dollar, in addition to being significantly below the 94.0% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 45.5% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 54.5% of loans by number and 59.2% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly above the aggregate lending data, at 47.1% by number and 31.3% by dollar, in addition to being below the 93.6% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 18.2% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment areas, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T made an adequate level of community development loans. During the evaluation period, community development lending totaled 1 loan for approximately \$3.5 million. The community development lending in this assessment area represented 0.1% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance of approximately \$1.7 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$12.1 million, this represented a significant decline in performance. However, based on annualized community development loans to deposits, the bank ranked 1<sup>st</sup> out of five when compared to similarly situated banks that primarily served this assessment area.



M&T’s community development lending was primarily in revitalization and stabilization as noted in the table.

<b>MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) Community Development Lending January 1, 2020 to December 31, 2021</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	0	0	0	0	0	0	1	3,466	<b>1</b>	<b>3,466</b>
2021	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>3,466</b>	<b>1</b>	<b>3,466</b>

The following is an example of community development lending which benefited the assessment area:

- In 2020, the bank provided a \$3.5 million PPP loan to a business in a low-income census tract. This loan supported revitalization and stabilization efforts during the COVID-19 pandemic in the assessment area.

**Innovative and/or Flexible Lending Practices**

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

**INVESTMENT TEST**

M&T’s performance was good in the investment test for this assessment area. The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

**Investment and Grant Activity**

The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. During the evaluation period, the bank reported 23 qualified investments and grants totaling approximately \$15.5 million in this assessment area, which included 2 prior period investments totaling \$15.3 million and 21 grants totaling \$242,000. The community development activity in this assessment area represented 1.2% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments increased since prior evaluation, with \$7.8 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$1.6 million in annualized qualified investments and grants at the previous evaluation. Although the bank ranked 2<sup>nd</sup> out of five in annualized community development investments and grants to deposits, compared to similarly

situated banks that primarily served this assessment area, performance was driven by prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	1	13,266	0	0	1	2,005	0	0	2	15,271
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0
<b>Total Investments</b>	<b>1</b>	<b>13,266</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2,005</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>15,271</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>242</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>242</b>
<b>Grand Total</b>	<b>1</b>	<b>13,266</b>	<b>21</b>	<b>242</b>	<b>1</b>	<b>2,005</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>15,513</b>

The following are examples of community development investments and grants that benefited the assessment area:

- One of the prior period investments included an investment used to build a development that qualified for LIHTC. LIHTC is a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. With these investments the bank supported affordable housing for LMI individuals.
- The bank’s \$242,000 in grants or donations were entirely comprised of funds to organizations that provide community services for LMI geographies or individuals.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank’s qualified investments primarily promoted affordable housing and economic development, which are community development needs within this assessment area. Qualified grants primarily promoted community services towards LMI individuals.

### **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives. The bank’s prior period investments consisted of 50% LIHTC and 50% SBA loan funds.

### **SERVICE TEST**

M&T’s performance was poor in the service test for this assessment area. Delivery systems were accessible to limited portions of the assessment area, particularly LMI geographies and/or LMI individuals. To the

extent changes were made, the institution’s record of opening and closing branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services varied in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or individuals. The bank provided a limited level of community development services in this assessment area.

**Retail Services**

***Accessibility of Delivery Systems***

Delivery systems were accessible to limited portions of the assessment area. M&T did not operate any branches in this assessment area. The bank maintained a total of two ATMs, neither of which were in LMI census tracts. The percentage of ATMs was lower than both the percentage of LMI census tracts in this MSA (35.5%) and the percentage of the population residing in LMI census tracts (34.8%).

***Changes in Branch Locations***

M&T had no branches in this geography and did not open, close, or relocate any branches during the evaluation period. As such, the institution’s record of opening and closing branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

***Reasonableness of Business Hours and Services***

Services varied in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or individuals. There were no branches in this assessment area and both offsite ATMs were located in upper-income census tracts.

The bank’s products and services in this assessment area were consistent with those discussed at the state level.

**Community Development Services**

M&T provided a limited level of community development services in this assessment area. The bank conducted one service during the evaluation period that primarily addressed community services. This activity accounted for 0.1% of the bank’s total community development services activity. On an annualized basis, this represented a decrease as the bank made 0.5 community development services, compared to the previous exam’s annualized performance of 1.5 community development services. However, this decrease can be attributed to the restrictions imposed due to COVID-19. The bank had 10 community development service hours during the evaluation period, which on an annualized basis was five hours per year.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)</b>					
<b>Community Development Services</b>					
<b>January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>

2020	0	0	0	0	<b>0</b>
2021	0	1	0	0	<b>1</b>
<b>Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>

The following is an example of a community development service that benefited this assessment area:

- In 2021, the bank had one instance of an employee serving on the board of an organization dedicated to providing community services to LMI individuals.

## METROPOLITAN AREA MSA 38940 (PORT ST. LUCIE, FL)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T did not have any branches operating and had 2 of its 1,882 ATMs in this assessment area. As of June 30, 2021, the bank did not have any deposits in this assessment area. This assessment area generated approximately 0.02% by number and 0.03% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southeast Florida, the assessment area consisted of a partial MSA, including all of Martin County, while excluding all of St. Lucie County. The principal city in the assessment area was Stuart, FL.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 38940 (Port St. Lucie, FL) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0.0%	0.0%	14.3%
Moderate Income	5	13.9%	7.0%	17.1%
Middle Income	12	33.3%	36.2%	17.5%
Upper Income	17	47.2%	56.8%	51.1%
Unknown	2	5.6%	0.0%	0.0%
<b>Total</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 38940 (Port St. Lucie, FL)	Below	Below	Below

M&T's lending test performance in the assessment area was below the state of Florida performance, as lending activity was poor, borrower distribution was poor, and geographic distribution was very poor. There were no community development loans during the evaluation period.

Investment test performance was below the state of Florida performance. M&T did not have any investments in this assessment area. The bank made 9 grants and donations totaling \$49,000.

Service test performance was below the state of Florida performance. The bank did not operate any branches in the assessment area and none of the two ATMs were in LMI census tracts. In addition, the bank did not have any community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 42680 (SEBASTIAN-VERO BEACH, FL)-- LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of M&T's performance in this assessment area was conducted. As of December 31, 2021, M&T did not have any branches operating and had 2 of its 1,882 ATMs in this assessment area. As of June 30, 2021, the bank did not have any deposits in this assessment area. This assessment area generated approximately 0.01% by number and 0.04% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021.

Located in southeast Florida, this assessment area consisted of the entire MSA, comprised of Indian River County. The principal cities in the assessment area were Sebastian and Vero Beach, FL.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 42680 (Sebastian-Vero Beach, FL) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	<b>#</b>	<b>%</b>		
Low Income	1	3.2%	1.4%	20.6%
Moderate Income	5	16.1%	13.4%	18.6%
Middle Income	15	48.4%	54.1%	18.6%
Upper Income	8	25.8%	31.1%	42.2%
Unknown	2	6.5%	0.0%	0.0%
<b>Total</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 42680 (Sebastian-Vero Beach, FL)	Below	Below	Consistent

M&T's lending test performance in the assessment area was below the state of Florida performance, as lending activity, borrower distribution, and geographic distribution were poor. There were no community development loans during the evaluation period.

Investment test performance was below the state of Florida performance. M&T did not have any investments in this assessment area. The bank made 12 grants and donations totaling \$71,000.

Service test performance was consistent with the state of Florida performance. The bank did not operate any branches in the assessment area and none of the two ATMs were in LMI census tracts. The bank had 2 instances, totaling 11 hours of community development services in this assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.



## STATE OF CONNECTICUT

### CRA RATING FOR CONNECTICUT: **SATISFACTORY**

*The Lending Test is rated: **Outstanding***

*The Investment Test is rated: **High Satisfactory***

*The Service Test is rated: **Low Satisfactory***

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout this assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made extensive use of innovative and/or flexible lending practices in serving credit needs.

#### INVESTMENT TEST

- Made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Occasionally used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were accessible to limited portions of the assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of this assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.



## **SCOPE OF EXAMINATION**

The evaluation of M&T's activities in the state of Connecticut consisted of a full-scope review of the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area. This assessment area was evaluated under full-scope procedures as it is the only assessment area in the state of Connecticut.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS**

M&T's Connecticut operations were entirely within the MSA 14860 (Bridgeport-Stamford-Norwalk, CT). Please refer to the Description of Institution's Operations under MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Full Review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF CONNECTICUT**

Conclusions regarding M&T's performance in the state of Connecticut were solely based on the performance in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area. Specific comments regarding the lending, investment, and service tests were discussed under the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Full Review.

## **METROPOLITAN AREA MSA 14860 (Bridgeport-Stamford-Norwalk, CT)-- FULL REVIEW**

### **SCOPE OF EXAMINATION**

Examiners used full-scope examination procedures to evaluate the bank’s performance in this assessment area as detailed in Appendix A.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

M&T operated 9 of its 664 locations and 13 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 28 institutions operated 333 offices within this assessment area. M&T ranked 23<sup>rd</sup> with approximately \$289.2 million in deposits, which represented 0.5% of the deposit market share and accounted for 0.2% of the bank’s total branch deposits. This assessment area generated approximately 1.1% by number and 1.8% by dollar of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions such as Bank of America, JP Morgan Chase, Citibank, and Wells Fargo.

### **PERFORMANCE CONTEXT**

#### *Demographic Characteristics*

The MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area was comprised of Fairfield County. According to the 2015 ACS, the population of this assessment area was 939,983. The assessment area consisted of 211 census tracts, of which 31 or 14.7% were low-income, 40 or 19.0% were moderate-income, 57 or 27.0% were middle-income, 81 or 38.4% were upper-income, and 2 or 0.9% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area had 232,921 families, of which 24.6% were low-income (6.4% of which were below the poverty level), 15.6% were moderate-income, 17.8% were middle-income, and 42.0% were upper-income.

The FFIEC median family incomes for the county comprising the MSA as of the 2015 ACS was as follows:

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$115,407	\$120,156	4.1%
Fairfield County, CT	\$115,407	\$120,156	4.1%
State of Connecticut	\$97,273	\$102,061	4.9%

*Source: 2011 - 2015 U.S. Census Bureau American Community Survey.  
2016 - 2020 U.S. Census Bureau American Community Survey.  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

### **Housing Characteristics**

Based on the 2015 ACS data, the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area had 363,556 housing units, of which 62.8% were owner-occupied, 29.1% were rental, and 8.0% were vacant. Of the total housing units, 12.6% were located in low-income census tracts, 21.4% in moderate-income census tracts, 31.7% in middle-income census tracts, and 34.2% in upper-income census tracts. In low-income census tracts, 25.5% of housing units were owner-occupied, 61.0% were rental units, and 13.5% were vacant. In moderate-income census tracts, 47.2% of housing units were owner-occupied, 43.9% were rental units, and 8.9% were vacant.

The median age of housing stock in this assessment area was 52 years old, with 29.0% of the stock built before 1950. The median age of housing stock was 61 years in both low-income and moderate-income census tracts. According to the 2015 ACS, the median housing value in this assessment area was \$416,024 with an affordability ratio of 20.2. The median gross rent in the assessment area was \$1,348 per month.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>			
<b>Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$416,024	20.2	\$1,348
Fairfield County, CT	\$416,024	20.2	\$1,348
State of Connecticut	\$270,500	26.0	\$1,075

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

### **Housing Cost Burden**

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 49.4% of all rental households had rental costs that exceeded 30% of their incomes, 77.2% of low-income rental households had rental costs that exceeded 30% of their income, and 42.1% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 30.7% of homeowners had housing costs that exceeded 30% of their incomes, 81.5% of low-income homeowners had housing costs that exceeded 30% of their income, and 57.5% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>						
<b>Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	77.2%	42.1%	49.4%	81.5%	57.5%	30.7%
Fairfield County, CT	77.2%	42.1%	49.4%	81.5%	57.5%	30.7%
State of Connecticut	74.6%	33.5%	46.4%	78.9%	46.4%	26.3%

*\*Cost Burden is housing cost that equals 30% or more of household income*

*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*

***Labor, Employment and Economic Characteristics***

According to D&B data, there were 68,130 businesses operating in this assessment area in 2021, of which 9.3% were located in low-income census tracts and 16.1% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.7% were small businesses with a GAR of \$1 million or less, of which 9.1% were located in low-income census tracts and 15.9% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.4% in 2019, increased to 7.8% in 2020, and decreased to 6.1% in 2021. The state of Connecticut had an unemployment rate of 3.5% in 2019, increased to 7.8% in 2020, and decreased to 6.3% in 2021.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.4%	7.8%	6.1%
Fairfield County, CT	3.4%	7.8%	6.1%
State of Connecticut	3.5%	7.8%	6.3%

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

Additional performance context data for this assessment area is provided in the following MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area Demographics Table:

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>									
<b>Assessment Area Demographics</b>									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	31	14.7	25,980	11.2	5,928	22.8	57,209	24.6	
Moderate-income	40	19.0	43,817	18.8	4,671	10.7	36,377	15.6	
Middle-income	57	27.0	71,494	30.7	2,459	3.4	41,431	17.8	
Upper-income	81	38.4	91,619	39.3	1,896	2.1	97,904	42.0	
Unknown-income	2	0.9	11	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>211</b>	<b>100.0</b>	<b>232,921</b>	<b>100.0</b>	<b>14,954</b>	<b>6.4</b>	<b>232,921</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%	
Low-income	45,976	11,714	5.1	25.5	28,050	61.0	6,212	13.5	
Moderate-income	77,904	36,769	16.1	47.2	34,166	43.9	6,969	8.9	
Middle-income	115,194	79,024	34.6	68.6	27,900	24.2	8,270	7.2	
Upper-income	124,471	100,874	44.2	81.0	15,812	12.7	7,785	6.3	
Unknown-income	11	0	0.0	0.0	11	100.0	0	0.0	
<b>Total Assessment Area</b>	<b>363,556</b>	<b>228,381</b>	<b>100.0</b>	<b>62.8</b>	<b>105,939</b>	<b>29.1</b>	<b>29,236</b>	<b>8.0</b>	
	Total Businesses by	Businesses by Tract & Revenue Size							
		Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	6,367	9.3	5,688	9.1	634	12.8	45	6.3	
Moderate-income	10,939	16.1	9,922	15.9	944	19.0	73	10.2	
Middle-income	20,698	30.4	18,997	30.4	1,523	30.7	178	24.9	
Upper-income	30,125	44.2	27,843	44.6	1,862	37.5	420	58.7	
Unknown-income	1	0.0	1	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>68,130</b>	<b>100.0</b>	<b>62,451</b>	<b>100.0</b>	<b>4,963</b>	<b>100.0</b>	<b>716</b>	<b>100.0</b>	
	<b>Percentage of Total Businesses:</b>			<b>91.7</b>		<b>7.3</b>		<b>1.1</b>	
	Total Farms by	Farms by Tract & Revenue Size							
		Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	13	3.7	13	3.8	0	0.0	0	0.0	
Moderate-income	21	5.9	21	6.1	0	0.0	0	0.0	
Middle-income	100	28.3	99	28.6	1	16.7	0	0.0	
Upper-income	219	62.0	213	61.6	5	83.3	1	100.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>353</b>	<b>100.0</b>	<b>346</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	
	<b>Percentage of Total Farms:</b>			<b>98.0</b>		<b>1.7</b>		<b>.3</b>	

2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.

## **Community Contact**

Examiners conducted community contact interviews with two community organizations that served this assessment area. The first contact was held with a community foundation that provides grants and support to non-profits across Fairfield County with a focus on Bridgeport. The contact stated that Fairfield County has a high concentration of poverty in pockets of its cities and that COVID-19 was difficult. However, inflation for some is worse, specifically, because many LMI individuals are just one paycheck away from homelessness. Additionally, the cost of energy prices spiked; as a result, the organization experienced a 100% increase from the prior year of people that needed additional support. The contact also noted that college education is too expensive and not necessarily the best path for many people due to the high cost. Although there are available jobs in Connecticut, a lot are in advance manufacturing, with very specific skill sets. Thus, the state is investing in a lot on work force development to train for these jobs.

A second community contact was made with an organization that provided energy assistance to families experiencing financial stress but were not eligible for government assistance. The contact noted that Connecticut ranked the fourth highest for energy costs in the country. Additionally, the contact stated that banks have an opportunity to improve their community involvement by collaborating with community leaders to develop specific goals supported by money and talent contributed by each party. There is also an opportunity for banks to support a better understanding of energy needs in urban areas, the impact of climate change, and the alternative sources of heat.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

M&T's performance was excellent in the lending test for this assessment area. The bank's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank made extensive use innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### **Lending Activity**

M&T's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. M&T's market share of deposits decreased slightly during the evaluation period; however, the bank's HMDA and small business market share remained steady throughout the evaluation period as noted below.

In 2021, the bank ranked 23<sup>rd</sup> out of 28 institutions with a deposit market share of 0.5%. In total HMDA lending, the bank ranked 38<sup>th</sup> out of 537 reporters with a market share of 0.7%, including market shares of 0.4% in home purchase lending, 0.5% in refinance, 6.1% in home improvement, and 0.9% in multifamily loans. M&T ranked 22<sup>nd</sup> out of 195 reporters with a market share of 0.8% in small business lending.

In 2020, the bank ranked 23<sup>rd</sup> out of 29 institutions with a deposit market share of 0.5%. In total HMDA lending, the bank ranked 35<sup>th</sup> out of 504 reporters with a market share of 0.7%, including market shares of

0.5% in home purchase lending, 0.7% in refinance, 5.3% home improvement, and 1.2% in multifamily loans. M&T ranked 22<sup>nd</sup> out of 218 reporters with a market share of 0.8% in small business lending.

In 2019, the bank ranked 20<sup>th</sup> out of 30 institutions with a deposit market share of 0.6%. In total HMDA lending, the bank ranked 29<sup>th</sup> out of 449 reporters with a market share of 0.9%, including market shares of 0.7% in home purchase lending, 1.0% in refinance, 2.3% home improvement, and 0.9% in multifamily loans. M&T ranked 23<sup>rd</sup> out of 141 reporters with a market share of 0.4% in small business lending.

M&T's lending in this assessment area is summarized in the following table:

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	180	17.9%	25,537	5.2%
Home Purchase	252	25.1%	106,292	21.7%
Loan Purpose Not Applicable	144	14.3%	38,179	7.8%
Multi-Family	6	0.6%	105,670	21.6%
Refinancing	423	42.1%	213,474	43.6%
<b>Total HMDA</b>	<b>1,005</b>	<b>56.0%</b>	<b>489,152</b>	<b>84.9%</b>
<b>Total Small Business</b>	<b>791</b>	<b>44.0%</b>	<b>87,324</b>	<b>15.1%</b>
<b>TOTAL LOANS</b>	<b>1,796</b>	<b>100.0%</b>	<b>576,476</b>	<b>100.0%</b>

### Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area. Lending penetration in LMI tracts was good for home purchase, adequate for refinance, adequate for home improvement, excellent for multifamily, and good for small business loans.

### Gap Analysis

M&T demonstrated a good level of dispersion in LMI census tracts in this assessment area. The bank's performance in LMI census tracts fluctuated throughout the years but generally improved when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	31	15	51.6%
Moderate	40	16	60.0%
Middle	57	11	80.7%
Upper	81	12	85.2%
Income Unknown	2	2	0.0%
<b>2020</b>			
Low	31	9	71.0%

Moderate	40	7	82.5%
Middle	57	3	94.7%
Upper	81	4	95.1%
Income Unknown	2	2	0.0%
<b>2021</b>			
Low	31	10	67.7%
Moderate	40	9	77.5%
Middle	57	2	96.5%
Upper	81	5	93.8%
Income Unknown	2	2	0.0%

### ***Home Purchase Loans***

The geographic distribution of home purchase loans reflected good penetration throughout this assessment area.

In 2021, the bank made 11.8% of home purchase loans by number and 5.7% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 5.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 6.0% by number and 2.9% by dollar in low-income census tracts. In 2021, the bank made 14.5% of home purchase loans by number and 7.6% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly below the 16.1% of owner-occupied housing units located in moderate-income census tracts and was slightly below the aggregate, which made 19.2% by number and 10.2% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 15.7% of home purchase loans by number and 8.3% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 5.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.7% by number and 2.3% by dollar in low-income census tracts. In 2020, the bank made 21.7% of home purchase loans by number and 15.2% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 16.1% of owner-occupied housing units located in moderate-income census tracts and was above the aggregate, which made 16.0% by number and 8.7% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 15.1% of home purchase loans by number and 8.5% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 5.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 6.4% by number and 3.3% by dollar in low-income census tracts. In 2019, the bank made 16.1% of home purchase loans by number and 11.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was similar to the 16.1% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 17.7% by number and 10.8% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected adequate penetration throughout this assessment area.

In 2021, the bank made 2.7% by number and 1.3% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 5.1% of owner-



occupied housing units located in low-income census tracts and similar to the aggregate, which made 2.9% by number and 1.4% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 9.3% by number and 5.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 16.1% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 12.2% by number and 6.7% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank did not make any refinance loans in low-income census tracts. The bank made 10.3% by number and 6.9% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 16.1% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 10.1% by number and 5.9% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 1.9% by number and 0.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 5.1% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 3.1% by number and 1.3% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 7.4% by number and 2.5% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 16.1% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 10.9% by number and 5.3% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected adequate penetration throughout this assessment area.

In 2021, the bank made 4.0% by number and 1.6% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was slightly below the 5.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.5% by number and 0.9% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 4.0% by number and 1.7% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 16.1% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 6.5% by number and 3.8% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 1.9% by number and 1.1% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly below the 5.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.1% by number and 0.5% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 3.7% by number and 1.2% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 16.1% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 8.4% by number and 5.2% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank did not make any home improvement loans in low-income census tracts. The bank made 11.1% by number and 5.2% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 16.1% of owner-

occupied housing units located in moderate-income census tracts and above the aggregate, which made 8.8% by number and 6.4% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected excellent penetration throughout this assessment area.

In 2021, the bank made 33.3% by number and 1.3% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was above the 24.0% of multifamily housing units located in low-income census tracts and similar to the aggregate, which made 32.1% by number and 30.1% by dollar of multifamily loans in low-income census tracts. In 2021, the bank made 33.3% by number and 5.1% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was similar to the 33.3% of multifamily housing units located in moderate-income census tracts and similar to the aggregate, which made 34.8% by number and 24.4% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank made 50.0% by number and 70.0% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 24.0% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 30.1% by number and 18.2% by dollar of multifamily loans in low-income census tracts. In 2020, the bank made 50.0% by number and 30.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 33.3% of multifamily housing units located in moderate-income census tracts and slightly above the aggregate, which made 42.2% by number and 33.5% by dollar of multifamily loans in moderate-income census tracts.

In 2019, the bank did not make any multifamily loans in low-income census tracts. The bank made 100.0% by number and 100.0% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 33.3% of multifamily housing units located in moderate-income census tracts and significantly above the aggregate, which made 41.8% by number and 22.0% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 9.9% by number and 11.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 9.3% of businesses located in low-income census tracts and similar to the aggregate, which made 9.8% by number and 11.8% by dollar of small business loans in low-income census tracts. In 2021, the bank made 15.5% by number and 21.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 16.1% of businesses located in moderate-income census tracts and similar to the aggregate, which made 17.0% by number and 17.2% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 11.5% by number and 14.7% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was above the 9.3% of businesses located in low-income census tracts and slightly above the aggregate, which made 9.6% by number and 11.8% by dollar of small business loans in low-income census tracts. In 2020, the bank

made 14.8% by number and 22.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 16.1% of businesses located in moderate-income census tracts and similar to the aggregate, which made 15.5% by number and 17.6% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 13.6% by number and 28.9% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was significantly above the 8.9% of businesses located in low-income census tracts and above the aggregate, which made 9.4% by number and 11.7% by dollar of small business loans in low-income census tracts. In 2019, the bank made 16.8% by number and 8.4% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was similar to the 15.7% of businesses located in moderate-income census tracts and similar to the aggregate, which made 16.3% by number and 18.3% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 3.9% by number and 1.6% by dollar to low-income borrowers and was significantly below the 24.6% of low-income families in the assessment area. Performance was below aggregate lending, which made 7.4% by number and 2.8% by dollar to low-income families. The bank's lending to moderate-income borrowers was 23.7% by number and 12.9% by dollar, which was similar to the aggregate performance of 22.0% by number, similar to 11.9% by dollar, and significantly above the 15.6% moderate-income families in the assessment area.

In 2020, the bank made 12.0% by number and 5.2% by dollar to low-income borrowers and was significantly below the 24.6% of low-income families in the assessment area. Performance was above aggregate lending, which made 8.6% by number and 3.4% by dollar to low-income families. The bank's lending to moderate-income borrowers was 22.9% by number and 14.3% by dollar, which was similar to the aggregate performance of 21.5% by number, slightly above 12.3% by dollar, and above the 15.6% moderate-income families in the assessment area.

In 2019, the bank made 18.3% by number and 10.2% by dollar to low-income borrowers and was below the 24.6% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 10.2% by number and 4.4% by dollar to low-income families. The bank's lending to moderate-income borrowers was 28.0% by number and 19.3% by dollar, which was slightly above the aggregate performance of 23.3% by number, above 14.4% by dollar, and significantly above the 15.6% moderate-income families in the assessment area.

#### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 6.0% by number and 2.2% by dollar and was slightly above the aggregate lending data, at 5.4% by number and 2.3% by dollar. The bank's performance was significantly below the 24.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.3% by number and 9.8% by dollar, was slightly above the aggregate lending data at 15.6% by number, slightly above 8.5% by dollar, and slightly above the 15.6% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 3.6% by number and 1.0% by dollar and was slightly below the aggregate lending data, at 4.1% by number and 1.7% by dollar. The bank's performance was significantly below the 24.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 11.5% by number and 4.8% by dollar, was slightly below the aggregate lending data at 13.8% by number, below 7.8% by dollar, and below the 15.6% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 6.5% by number and 2.4% by dollar and was similar to the aggregate lending data, at 6.3% by number and 2.3% by dollar. The bank's performance was significantly below the 24.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 14.8% by number and 6.3% by dollar, was similar to the aggregate lending data at 14.7% by number, similar to 6.8% by dollar, and similar to the 15.6% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among low-income customers and good penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 2.0% by number and 0.6% by dollar and was below the aggregate lending data, at 3.5% by number and 1.6% by dollar. The bank's performance was significantly below the 24.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 12.1% by number and 7.0% by dollar, was slightly above the aggregate lending data at 9.7% by number, slightly above 5.7% by dollar, and slightly below the moderate-income families in the assessment area at 15.6%.

In 2020, the bank's lending to low-income borrowers was 5.6% by number and 3.4% by dollar and was slightly below the aggregate lending data, at 6.4% by number and 3.6% by dollar. The bank's performance was significantly below the 24.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 13.0% by number and 5.4% by dollar, was similar to the aggregate lending data at 13.3% by number, below 8.5% by dollar, and slightly below the moderate-income families in the assessment area at 15.6%.

In 2019, the bank made no loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 14.8% by number and 7.5% by dollar, was similar to the aggregate lending data at 13.5% by number, slightly below 8.5% by dollar, and similar to the moderate-income families in the assessment area at 15.6%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 39.5% of loans by number and 26.1% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly below the aggregate lending data, at 45.1% by number and 25.0% by dollar, in addition to being significantly below the 91.7% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 74.3% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 45.4% of loans by number and 26.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was slightly above the aggregate lending data, at 38.5% by number and 23.7% by dollar, in addition to being significantly below the 91.7% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 73.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 64.8% of loans by number and 48.1% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 46.8% by number and 33.8% by dollar, in addition to being below the 91.3% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 78.4% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

**Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

**Community Development Lending**

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 21 loans for approximately \$75.8 million, including seven loans for \$30.2 million that benefited the broader statewide regional area (“BSRA”). The community development lending in this assessment area represented 1.9% by dollar volume of the bank’s total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$37.9 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$30.1 million, this represented an increase 25.9% by dollar volume. Based on annualized community development loans to deposits the bank ranked 1<sup>st</sup> out of four when compared to similarly situated banks that primarily served this assessment area.

The institution’s community development loans by year and purpose are summarized in the table below.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>										
<b>Community Development Lending</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020	3	25,712	3	5,500	0	0	2	4,398	8	35,610

2021	4	6,900	1	2,000	0	0	1	1,101	6	10,001
BSRA	2	5,927	2	4,000	0	0	3	20,285	7	30,212
<b>Total</b>	<b>9</b>	<b>38,539</b>	<b>6</b>	<b>11,500</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>25,784</b>	<b>21</b>	<b>75,823</b>

Examples of community development lending which benefited this assessment area included the following:

- In 2020 and 2021, the bank made three term loans totaling \$5.2 million to help fund low-interest mortgages to LMI borrowers. With these loans, the bank supported affordable housing.
- In 2020 and 2021, the bank originated 3 PPP loans in amounts greater than \$1 million, totaling approximately \$5.5 million cumulatively, to organizations in LMI census tracts, which helped to revitalize and stabilize these communities.

### **Innovative and/or Flexible Lending Practices**

The institution made extensive use of innovative and/or flexible lending practices in order to serve this assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

Additionally, the bank offered these programs in the state of Connecticut:

- Connecticut Housing Finance Authority (CHFA) Financing: A below market rate program designed for first-time homebuyers who met CHFA purchase price and income limits and were purchasing an existing property in the state of Connecticut.
- CHFA Down-Payment Assistance: A second mortgage program designed to assist first-time homebuyers with down-payment assistance and settlement expenses who met CHFA purchase price and income limits and were purchasing an existing property.

### **INVESTMENT TEST**

M&T’s performance was good in the investment test for this assessment area. The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 47 qualified investments and grants totaling \$80.1 million in this assessment area, which included 1 new investment totaling \$14.1 million, 25 prior period investments with a current balance of \$4.2 million, 8 investments for \$61.5 million that benefited the BSRA, and 13 grants totaling \$294,000. The community development activity in this assessment area represented 6.2% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance increased since prior evaluation, with \$40.0 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$7.1 million at the previous evaluation. However, this performance was primarily driven by the dollar amount of BSRA investments. Based on annualized investments and grants to deposits,

the bank ranked 1<sup>st</sup> out of four, compared to similarly situated banks that primarily served this assessment area.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>										
<b>Qualified Investments and Grants</b>										
<b>January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	25	4,197	0	0	0	0	0	0	25	4,197
2020	0	0	1	14,125	0	0	0	0	1	14,125
2021	0	0	0	0	0	0	0	0	0	0
BSRA	6	8,447	2	53,015	0	0	0	0	8	61,462
<b>Total Investments</b>	<b>31</b>	<b>12,644</b>	<b>3</b>	<b>67,140</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>34</b>	<b>79,784</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>294</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>294</b>
<b>Grand Total</b>	<b>31</b>	<b>12,644</b>	<b>16</b>	<b>67,434</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>47</b>	<b>80,078</b>

The following are examples of community development investments and grants that benefited this assessment area:

- In 2021, the bank made a \$14.1 million new market tax credit investment that was used to support the rehab and reuse of a nursing home located in a low-income tract. With this investment, the bank helped to support medical community services for LMI individuals.
- The bank’s grants or donations were entirely comprised of funds to organizations that provided community services for LMI geographies or individuals.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank’s new qualified investment promoted community service efforts, which was a community development need within this assessment area. Qualified grants also promoted community services towards LMI individuals.

### **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives. The new investment consisted of a New Market Tax Credit. The prior period investments consisted of mortgage-backed securities and LIHTC.

### **SERVICE TEST**

M&T’s performance was adequate in the service test for this assessment area. Delivery systems were accessible to limited portions of the assessment area. To the extent changes were made, the bank’s opening

and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced certain portions of this assessment area, particularly in LMI census tracts or to LMI individuals. The bank provided an adequate level of community development services in this assessment area.

**Retail Services**

***Accessibility of Delivery Systems***

Delivery systems were accessible to limited portions of the institution’s assessment area, including LMI areas. M&T operated 9 full-service branches in this assessment area, of which only 1 branch (11.1%) was in a moderate-income census tract. The bank maintained a total of 13 ATMs, 1 full-service ATM at each branch location and 4 offsite full-service ATMs, of which only 1 ATM (7.7%) was in a moderate-income census tract. As a result, the bank’s percentage of branch and ATMs were below both the percentage of LMI census tracts in this assessment area (33.6%) and the percentage of the population residing in LMI census tracts (33.2%).

***Changes in Branch Locations***

To the extent changes were made, the institution’s opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened, closed, or relocated during the evaluation period.

***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced certain portions of this assessment area, particularly LMI census tracts or to LMI individuals. None of the branches in this assessment area offered extended hours or weekend hours; however, 3 (33.3%) branches offered drive-thru hours, including the LMI branch.

The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

**Community Development Services**

M&T provided an adequate level of community development services in this assessment area. The bank conducted eight services during the evaluation period that primarily addressed community services. This activity accounted for 0.5% of the bank’s total number of community development services. On an annualized basis over 24 months, the bank conducted 4 community development services, which was much lower than the previous evaluation’s annualized performance of 88 community development services. The bank had 93 community development service hours during the evaluation period, which on an annualized basis was 46.5 hours.

The bank’s community development services by year and purpose are summarized in the table below.

MSA 14860 (Bridgeport-Stamford-Norwalk, CT)					
Community Development Services					
January 1, 2020 to December 31, 2021					
	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals



<b>Year</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	1	4	0	0	5
2021	0	3	0	0	3
<b>Total</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>8</b>

The following are examples of community development services that benefited this assessment area:

- Three bank employees served on the board of directors for organizations dedicated to providing various services to LMI individuals. These organizations provided financial literacy, job development, and entrepreneurship services to LMI populations within the assessment area.
- One bank employee served on the board of directors of a nonprofit organization that promoted affordable housing services. The organizations provided various services including home lending education, financial literacy, and home counseling services to disadvantaged LMI individuals.

## STATE OF DELAWARE

### CRA RATING FOR DELAWARE: SATISFACTORY

*The Lending Test is rated: High Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: High Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout this assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- Made a relatively high level of community development loans.
- Made use of innovative and/or flexible lending practices in serving credit needs.

#### INVESTMENT TEST

- Made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Occasionally used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were readily accessible to all portions of the assessment area.
- Record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

## **SCOPE OF EXAMINATION**

The evaluation of M&T's activities in the state of Delaware consisted of a full-scope review of the MSA 20100 (Dover, DE) assessment area. The assessment area was evaluated under the full-scope procedures as it is the only assessment area in the state of Delaware.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS**

M&T's state of Delaware operations are entirely within the MSA 20100 (Dover, DE). Please refer to the Description of Institution's Operations under the MSA 20100 (Dover, DE) Full Review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF DELAWARE**

Conclusions regarding M&T's performance in the state of Delaware were solely based on the performance in the MSA 20100 (Dover, DE) assessment area. Specific comments regarding the lending, investment, and service tests were discussed under the MSA 20100 (Dover, DE) Full Review.

## METROPOLITAN AREA MSA 20100 (Dover, DE)-- FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank's performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 5 of its 664 locations and 22 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 11 institutions operated 30 offices within this assessment area. M&T ranked 1<sup>st</sup> with approximately \$1.5 billion in deposits, which represented 39.0% of the deposit market share and accounted for 1.2% of the bank's total branch deposits. This assessment area generated approximately 0.8% by number and 0.6% by dollar of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large institutions such as PNC Bank and Citizens Bank, as well as regional banks such as Shore United Bank and Artisans' Bank.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The MSA 20100 (Dover, DE) assessment area included Kent County. According to the 2015 ACS, the population of this assessment area was 169,509. The assessment area consisted of 33 census tracts, of which 1 or 3.0% were low-income, 6 or 18.2% were moderate-income, 21 or 63.6% were middle-income, 4 or 12.1% were upper-income, and 1 or 3.0% was of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 20100 (Dover, DE) assessment area had 42,277 families, of which 21.6% were low-income (9.9% of which were below the poverty level), 16.6% were moderate-income, 21.7% were middle-income, and 40.1% were upper-income.

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

<b>MSA 20100 (Dover, DE)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$70,200	\$70,383	0.3%
Kent County, DE	\$70,200	\$70,383	0.3%
State of Delaware	\$79,750	\$84,825	6.4%
<small>Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</small>			

***Housing Characteristics***

Based on the 2015 ACS data, the MSA 20100 (Dover, DE) assessment area had 67,315 housing units, of which 62.7% were owner-occupied, 27.3% were rental, and 10.0% were vacant. Of the total housing units, 1.6% were located in low-income census tracts, 15.9% in moderate-income census tracts, 68.7% in middle-income census tracts, and 13.8% in upper-income census tracts. In low-income census tracts, 30.0% of housing units were owner-occupied, 60.4% were rental units, and 9.6% were vacant. In moderate-income census tracts, 45.2% of housing units were owner-occupied, 45.6% were rental units, and 9.2% were vacant.

The median age of housing stock in this assessment area was 25 years old, with 9.2% of the stock built before 1950. The median age of housing stock was 61 years in low-income tracts and 32 years in moderate-income tracts. According to the 2015 ACS, the median housing value in this assessment area was \$200,465 with an affordability ratio of 27.4. The median gross rent in the assessment area was \$984 per month.

<b>MSA 20100 (Dover, DE) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$200,465	27.4	\$984
Kent County, DE	\$200,465	27.4	\$984
State of Delaware	\$231,500	26.1	\$1,018
<i>Source: 2011 – 2015 U.S. Census Bureau American Community Survey</i>			

***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 49.3% of all rental households had rental costs that exceeded 30% of their incomes, 77.3% of low-income rental households had rental costs that exceeded 30% of their income, and 64.5% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 21.7% of homeowners had housing costs that exceeded 30% of their incomes, 69.9% of low-income homeowners had housing costs that exceeded 30% of their income, and 36.9% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 20100 (Dover, DE) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	77.3%	64.5%	49.3%	69.9%	36.9%	21.7%
Kent County, DE	77.3%	64.5%	49.3%	69.9%	36.9%	21.7%
State of Delaware	75.8%	42.8%	43.4%	64.0%	35.2%	21.2%
<i>*Cost Burden is housing cost that equals 30% or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy</i>						

***Labor, Employment and Economic Characteristics***

According to D&B data, there were 8,801 businesses operating in this assessment area in 2021, of which 18.3% were located in low-income census tracts and 12.5% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 93.1% were small businesses with a GAR of \$1 million or less, of which 18.1% were located in low-income census tracts and 12.1% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.1% in 2019, increased to 8.3% in 2020, and decreased to 6.2% in 2021. The state of Delaware had an unemployment rate of 3.7% in 2019, increased to 7.6% in 2020, and decreased to 5.3% in 2021.

<b>MSA 20100 (Dover, DE)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.1%	8.3%	6.2%
Kent County, DE	4.1%	8.3%	6.2%
State of Delaware	3.7%	7.6%	5.3%

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

Additional performance context data for this assessment area is provided in the following MSA 20100 (Dover, DE) Assessment Area Demographics Table:

<b>MSA 20100 (Dover, DE)</b>								
<b>Assessment Area Demographics</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.0	489	1.2	189	38.7	9,119	21.6
Moderate-income	6	18.2	6,314	14.9	839	13.3	7,026	16.6
Middle-income	21	63.6	29,632	70.1	2,812	9.5	9,181	21.7
Upper-income	4	12.1	5,842	13.8	360	6.2	16,951	40.1
Unknown-income	1	3.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>33</b>	<b>100.0</b>	<b>42,277</b>	<b>100.0</b>	<b>4,200</b>	<b>9.9</b>	<b>42,277</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	1,051	315	0.7	30.0	635	60.4	101	9.6
Moderate-income	10,742	4,854	11.5	45.2	4,902	45.6	986	9.2
Middle-income	46,230	30,616	72.6	66.2	10,880	23.5	4,734	10.2
Upper-income	9,292	6,400	15.2	68.9	1,969	21.2	923	9.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>67,315</b>	<b>42,185</b>	<b>100.0</b>	<b>62.7</b>	<b>18,386</b>	<b>27.3</b>	<b>6,744</b>	<b>10.0</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%

Low-income	1,607	18.3	1,481	18.1	71	15.7	55	34.8
Moderate-income	1,097	12.5	988	12.1	87	19.2	22	13.9
Middle-income	5,102	58.0	4,781	58.4	250	55.2	71	44.9
Upper-income	995	11.3	940	11.5	45	9.9	10	6.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>8,801</b>	<b>100.0</b>	<b>8,190</b>	<b>100.0</b>	<b>453</b>	<b>100.0</b>	<b>158</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>		<b>93.1</b>			<b>5.1</b>		<b>1.8</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	4	1.5	4	1.5	0	0.0	0	0.0
Moderate-income	25	9.2	22	8.3	3	42.9	0	0.0
Middle-income	236	86.8	231	87.5	4	57.1	1	100.0
Upper-income	7	2.6	7	2.7	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>272</b>	<b>100.0</b>	<b>264</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	<b>Percentage of Total Farms:</b>		<b>97.1</b>			<b>2.6</b>		<b>.4</b>
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information</i>								

## Community Contact

Examiners conducted a community contact interview with a community organization that served this assessment area. The community contact was held with an organization that specializes in affordable housing counseling and development, financial education, and lending. The organization identified cost of living, inflation, and affordable housing as the biggest challenges in this assessment area. There has been a recent increase in evictions and foreclosures as the court system recovers from the pandemic. There was very little zoning for multifamily housing in the area. The contact also noted a mismatch of jobs and skills available to fill those jobs coupled with hourly wage rates that have not kept up with the rise in prices for housing, food, and medicine. The organization would like a simpler approach for borrowers to get funding when needed, and suggested banks provide larger grants or donations and offer lower-rate interest loans for LMI individuals.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

M&T's performance was good in the lending test for this assessment area. The bank's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected good penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of this assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank made a relatively high level of community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

## Lending Activity

M&T's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. M&T had a large portion of the market share of deposits, which increased during the evaluation period. However, the bank's HMDA market share slightly decreased, but remained in the top 20 lenders in the assessment area. The bank's small business lending market share remained strong throughout the evaluation period.

In 2021, the bank ranked 1<sup>st</sup> out of 11 institutions with a deposit market share of 39.0%. In total HMDA lending, the bank ranked 18<sup>th</sup> out of 300 reporters with a market share of 1.6%, including market shares of 0.6 % in home purchase lending, 1.5% in refinance, and 18.3% in home improvement, and 0.0% in multifamily loans. M&T ranked 5<sup>th</sup> out of 109 reporters with a market share of 6.2% in small business lending.

In 2020, the bank ranked 2<sup>nd</sup> out of 11 institutions with a deposit market share of 23.9%. In total HMDA lending, the bank ranked 16<sup>th</sup> out of 290 reporters with a market share of 1.8%, including market shares of 1.3% in home purchase lending, 1.3% in refinance, 19.0% home improvement, and 0.0% in multifamily loans. M&T ranked 3<sup>rd</sup> out of 108 reporters with a market share of 9.0% in small business lending.

In 2019, the bank ranked 1<sup>st</sup> out of 11 institutions with a deposit market share of 26.1%. In total HMDA lending, the bank ranked 12<sup>th</sup> out of 285 reporters with a market share of 2.3%, including market shares of 1.4% in home purchase lending, 2.2% in refinance, 13.0% home improvement, and 0.0% in multifamily loans. M&T ranked 9<sup>th</sup> out of 76 reporters with a market share of 4.3% in small business lending.

M&T's lending in this assessment area is summarized in the following table:

<b>MSA 20100 (Dover, DE) Summary of Lending Activity January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	166	29.4%	11,156	9.7%
Home Purchase	150	26.6%	35,384	30.7%
Home Purpose Not Applicable	25	4.4%	4,118	3.6%
Multi-Family	2	0.4%	25,525	22.2%
Refinancing	221	39.2%	38,968	33.8%
<b>Total HMDA</b>	<b>564</b>	<b>43.1%</b>	<b>115,151</b>	<b>64.1%</b>
<b>Total Small Business</b>	<b>744</b>	<b>56.8%</b>	<b>63,907</b>	<b>35.6%</b>
<b>Total Small Farm</b>	<b>2</b>	<b>0.1%</b>	<b>456</b>	<b>0.3%</b>
<b>TOTAL LOANS</b>	<b>1,310</b>	<b>100.0%</b>	<b>179,514</b>	<b>100.0%</b>

## Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 20100 (Dover, DE) assessment area. Lending penetration in LMI tracts was good for home purchase, good for refinance, adequate for home improvement, poor for multifamily, and good for small business loans.



**Gap Analysis**

M&T demonstrated an excellent level of dispersion in LMI census tracts in this assessment area. In 2019, the bank’s performance was at 100.0% and 66.7%, in low-income and moderate-income census tracts, respectively, and showed an increase in 2020, with another increase in 2021. Overall, performance in this assessment area showed improvement when compared to the previous evaluation period. The bank’s lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 20100 (Dover, DE)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	1	0	100.0%
Moderate	6	2	66.7%
Middle	21	0	100.0%
Upper	4	0	100.0%
Income Unknown	1	1	0.0%
<b>2020</b>			
Low	1	0	100.0%
Moderate	6	1	83.3%
Middle	21	0	100.0%
Upper	4	0	100.0%
Income Unknown	1	1	0.0%
<b>2021</b>			
Low	1	0	100.0%
Moderate	6	0	100.0%
Middle	21	0	100.0%
Upper	4	0	100.0%
Income Unknown	1	1	0.0%

**Home Purchase Loans**

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area.

In 2021, the bank made did not make any home purchase loans in low-income census tracts. The bank made 11.8% of home purchase loans by number and 13.4% by dollar in moderate-income census tracts. The bank’s home purchase lending performance was similar to the 11.5% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 11.3% by number and 9.5% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank 3.5% of home purchase loans by number and 2.0% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 0.7% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate,

which made 0.7% by number and 0.6% by dollar in low-income census tracts. In 2020, the bank made 8.8% of home purchase loans by number and 9.5% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly below the 11.5% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 8.7% by number and 7.3% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 1.7% of home purchase loans by number and 0.7% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 0.7% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 0.9% by number and 0.7% by dollar in low-income census tracts. In 2019, the bank made 8.5% of home purchase loans by number and 4.9% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the 11.5% of owner-occupied housing units located in moderate-income census tracts and was slightly below the aggregate, which made 9.5% by number and 8.4% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 2.1% by number and 1.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly above the 0.7% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 0.5% by number and 0.3% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 7.3% by number and 7.4% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was below the 11.5% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 8.7% by number and 7.6% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank did not make any refinance loans in low-income census tracts. The bank made 10.3% by number and 10.3% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 11.5% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 7.8% by number and 7.1% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank did not make any refinance loans in low-income census tracts. The bank made 12.3% by number and 10.8% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 11.5% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 8.2% by number and 7.3% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 3.1% by number and 1.3% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly above the 0.7% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 0.6% by number and 0.2% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 4.7% by number and 4.2% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in

moderate-income census tracts was significantly below the 11.5% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 8.3% by number and 7.7% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank did not make any home improvement loans in low-income census tracts. The bank made 15.3% by number and 10.5% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was above the 11.5% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 9.4% by number and 8.5% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 2.3% by number and 2.8% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly above the 0.7% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.2% by number and 1.4% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 7.0% by number and 3.7% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 11.5% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 7.6% by number and 8.9% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected poor penetration throughout the assessment area. In 2021 and 2020, the bank did not make any multifamily loans in LMI census tracts.

In 2019, the bank did not make any multifamily loans in low-income census tracts. In 2019, the bank made one multifamily loan which was 100% by number and 100% by dollar in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was above the 30.6% of multifamily housing units located in moderate-income census tracts and above the aggregate, which made 41.7% by number and 40.5% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

The geographic distribution of small business loans reflected good penetration throughout this assessment area.

In 2021, the bank made 10.1% by number and 13.5% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was below the 18.3% of businesses located in low-income census tracts and significantly below the aggregate, which made 22.5% by number and 20.0% by dollar of small business loans in low-income census tracts. In 2021, the bank made 17.9% by number and 11.3% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was above the 12.5% of businesses located in moderate-income census tracts and above the aggregate, which made 12.2% by number and 11.9% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 7.1% by number and 10.3% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was significantly below the 14.3% of businesses located in low-income census tracts and significantly below the aggregate, which made 16.3% by number and 13.0% by dollar of small business loans in low-income census tracts. In 2020, the bank made 24.2% by number and 21.8% by dollar of small business loans in moderate-income census

tracts. M&T's small business lending performance in moderate-income census tracts was significantly above the 12.5% of businesses located in moderate-income census tracts and significantly above the aggregate, which made 12.7% by number and 14.1% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 4.4% by number and 9.6% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was significantly below the 11.9% of businesses located in low-income census tracts and significantly below the aggregate, which made 14.9% by number and 10.5% by dollar of small business loans in low-income census tracts. In 2019, the bank made 20.4% by number and 20.6% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly above the 13.5% of businesses located in moderate-income census tracts and above the aggregate, which made 14.6% by number and 17.2% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was adequate and lending to businesses with gross annual revenues of \$1 million or less was good.

#### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 5.9% by number and 3.5% by dollar to low-income borrowers and was significantly below the 21.6% of low-income families in this assessment area. Performance was significantly above aggregate lending, which made 3.0% by number and 1.7% by dollar to low-income families. The bank's lending to moderate-income borrowers was 17.6% by number and 13.5% by dollar, which was similar to the aggregate performance of 18.7% by number, slightly below 15.1% by dollar, and similar to the 16.6% moderate-income families in this assessment area.

In 2020, the bank made 1.8% by number and 1.0% by dollar to low-income borrowers and was significantly below the 21.6% of low-income families in the assessment area. Performance was below aggregate lending, which made 5.3% by number and 3.2% by dollar to low-income families. The bank's lending to moderate-income borrowers was 29.8% by number and 25.4% by dollar, which was above the aggregate performance of 22.1% by number, above 18.1% by dollar, and significantly above the 16.6% moderate-income families in the assessment area.

In 2019, the bank made 3.4% by number and 1.4% by dollar to low-income borrowers and was significantly below the 21.6% of low-income families in the assessment area. Performance was similar to aggregate lending, which made 3.1% by number and 1.6% by dollar to low-income families. The bank's lending to moderate-income borrowers was 16.9% by number and 12.9% by dollar, which was slightly below the aggregate performance of 18.9% by number, slightly below 15.1% by dollar, and similar to the 16.6% moderate-income families in the assessment area.

#### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and good penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 10.4% by number and 5.9% by dollar and was significantly above the aggregate lending data, at 3.8% by number and 2.2% by dollar. The bank's performance was significantly below the 21.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 13.5% by number and 10.4% by dollar, was slightly above the aggregate lending data at 12.2% by number, similar to 9.7% by dollar, and slightly below the 16.6% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 7.4% by number and 3.9% by dollar and was significantly above the aggregate lending data, at 2.5% by number and 1.4% by dollar. The bank's performance was significantly below the 21.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 22.1% by number and 14.9% by dollar, was significantly above the aggregate lending data at 9.6% by number, significantly above 7.1% by dollar, and above the 16.6% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 1.8% by number and 0.5% by dollar and was below the aggregate lending data, at 3.8% by number and 2.2% by dollar. The bank's performance was significantly below the 21.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 12.3% by number and 10.2% by dollar, was slightly above the aggregate lending data at 11.2% by number, slightly above 8.4% by dollar, and below the 16.6% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 6.3% by number and 4.5% by dollar and was similar to the aggregate lending data, at 6.6% by number and 6.1% by dollar. The bank's performance was significantly below the 21.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.2% by number and 22.9% by dollar, was similar to the aggregate lending data at 16.3% by number, above 17.0% by dollar, and similar to the moderate-income families in the assessment area at 16.6%.

In 2020, the bank's lending to low-income borrowers was 13.6% by number and 7.7% by dollar and was significantly above the aggregate lending data, at 5.2% by number and 4.3% by dollar. The bank's performance was below the 21.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 16.9% by number and 15.5% by dollar, was above the aggregate lending data at 13.2% by number, above 11.9% by dollar, and similar to the moderate-income families in the assessment area at 16.6%.

In 2019, the bank's lending to low-income borrowers was 4.7% by number and 3.3% by dollar and was below the aggregate lending data, at 6.4% by number and 5.6% by dollar. The bank's performance was significantly below the 21.6% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 20.9% by number and 17.3% by dollar, was similar to the aggregate lending data at 19.4% by number, similar to 19.1% by dollar, and above the moderate-income families in the assessment area at 16.6%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 45.1% of loans by number and 29.1% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 47.2% by number and 30.8% by dollar, in addition to being significantly below the 93.1% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 81.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 51.0% of loans by number and 36.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 34.2% by number and 25.9% by dollar, in addition to being below the 93.1% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 76.1% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 69.3% of loans by number and 45.9% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly above the aggregate lending data, at 44.9% by number and 39.2% by dollar, in addition to being slightly below the 92.4% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 86.9% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T made a relatively high level of community development loans. During the evaluation period, community development lending totaled three loans for approximately \$12.5 million. The community development lending in this assessment area represented 0.3% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$6.3 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$4.1 million, this represented a 53.7% increase by dollar volume. Based on annualized community development loans to deposits, the bank ranked 3<sup>rd</sup> out of four compared to similarly situated banks that primarily served this assessment area.

The institution's community development loans by year and purpose are summarized in the table below.

<b>MSA 20100 (Dover, DE) Community Development Lending January 1, 2020 to December 31, 2021</b>
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Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	0	0	1	10,320	0	0	2	2,195	3	12,515
2021	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>10,320</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2,195</b>	<b>3</b>	<b>12,515</b>

The following are examples of community development lending which benefited this assessment area:

- In 2020, the bank provided a \$10.3 million construction loan to finance the new construction of a state police station in a moderate-income census tract.
- In 2020, the bank originated 2 PPP loans in amounts greater than \$1 million, totaling approximately \$2.2 million cumulatively, to organizations in LMI census tracts, which helped to revitalize and stabilize these communities.

### **Innovative and/or Flexible Lending Practices**

The bank used innovative and/or flexible lending practices in order to serve this assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### **INVESTMENT TEST**

M&T’s performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank made an adequate level of qualified community development investments and grants. During the evaluation period, the bank reported 30 qualified investments and grants totaling \$4.6 million in this assessment area, which included 5 prior investments with a current balance of \$4.0 million, and 25 grants totaling \$588,000 (including one grant totaling \$9,500 that benefited the BSRA). The bank did not have any new qualified investments. The community development activity in this assessment area represented 0.4% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants slightly decreased since prior evaluation, with \$2.3 million in annualized qualified investments and grants at this evaluation compared to \$2.6 million in annualized qualified investments and grants at the previous evaluation. However, this performance was primarily driven by the dollar amount of prior period investments. Additionally, based on annualized investments and grants to deposits, the bank ranked 3<sup>rd</sup> out of four, compared to similarly situated banks that primarily served this assessment area.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 20100 (Dover, DE) Qualified Investments and Grants</b>
---

January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	5	4,011	0	0	0	0	0	0	5	4,011
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0
<b>Total Investments</b>	5	4,011	0	0	0	0	0	0	5	4,011
<b>Total Grants</b>	0	0	25	588	0	0	0	0	25	588
<b>Grand Total</b>	5	4,011	25	588	0	0	0	0	30	4,599

The following are examples of community development grants that benefited this assessment area:

- In 2020 and 2021, the bank provided two grants totaling \$125,000 to an organization that provided programs, services, support, and advocacy to help resolve complex social challenges. These programs include, but are not limited to, agriculture-focused training, emergency financial and food support, job training, entrepreneurship, youth development, and financial literacy. This program provided community services geared towards LMI families.
- In 2020 and 2021, the bank provided two grants totaling \$40,000 to an organization that sought to eliminate poverty housing and worked to revitalize communities by building and restoring houses for families in need. This program provided community services geared towards affordable housing for LMI families.

### Responsiveness to Credit and Community Development Needs

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank did not make any new investments. Prior period investments primarily promoted affordable housing efforts, which is a community development need within this assessment area. Qualified grants primarily promoted community services towards LMI individuals within the assessment area.

### Community Development Initiatives

The bank occasionally used innovative and/or complex investments to support community development initiatives. The bank's investments, all from the prior period, consisted of mortgage-backed securities and LIHTC.

### SERVICE TEST

M&T's performance was good in the service test for this assessment area. Delivery systems were readily accessible to all portions of the assessment area, including LMI areas. To the extent changes were made, the institution's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or individuals. The bank provided an adequate level of community development services.

### Retail Services



***Accessibility of Delivery Systems***

Delivery systems were readily accessible to all portions of the assessment area. M&T operated 5 full-service branches in this assessment area, of which 3 (60.0%) were in LMI census tracts. The bank maintained a total of 22 ATMs, 1 full-service ATM at one branch location, 2 full-service ATMs at 4 branch locations and 13 offsite cash-only ATMs, of which 8 (36.4%) were in LMI census tracts. As a result, the bank’s percentage of branch and ATM locations were above both the percentage of LMI census tracts in this MSA (21.2%) and the percentage of the population residing in LMI census tracts (16.7%).

***Changes in Branch Locations***

To the extent changes were made, the institution’s opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened, closed, or relocated during the evaluation period.

***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or individuals. All of the branches offered extended hours, weekend hours, and drive-thru hours, including the locations in LMI census tracts.

The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

**Community Development Services**

M&T provided an adequate level of services in this assessment area. The bank conducted three services during the evaluation period that primarily addressed affordable housing and community services. This activity accounted for 0.2% of the bank’s total community development services activity. On an annualized basis, this represented a significant decrease as the bank made 1.5 community development services, compared to the previous exam’s annualized performance of 24.2 community development services. The bank had 32.0 hours during the evaluation period, which on an annualized basis was 16.0 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 20100 (Dover, DE)</b>					
<b>Community Development Services</b>					
<b>January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	2	1	0	0	<b>3</b>
2021	0	0	0	0	<b>0</b>
<b>Total</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>3</b>

The following are examples of community development services that benefited this assessment area:

- In 2020, three bank employees served on the board of organizations dedicated to providing various services to LMI individuals. The organizations provided housing and shelter and food services to LMI populations within the assessment area.



## COMMONWEALTH OF MASSACHUSETTS

### CRA RATING FOR MASSACHUSETTS: NEEDS TO IMPROVE

*The Lending Test is rated: Low Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: Needs to Improve*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, very poor penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving credit needs.

#### INVESTMENT TEST

- Made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Rarely used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were accessible to limited portions of the assessment area.
- Record of opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services varied in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided a limited level of community development services.

## **SCOPE OF EXAMINATION**

The evaluation of M&T's activities in the Commonwealth of Massachusetts consisted of a full-scope review of the MD 14454 (Boston, MA) assessment area. This assessment area was evaluated under full-scope procedures as it is the only assessment area in Massachusetts.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS**

M&T's Massachusetts operations were entirely within the MD 14454 (Boston, MA) assessment area. Please refer to the Description of Institution's Operations under the MD 14454 (Boston, MA) Full Review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS**

Conclusions regarding M&T's performance in Massachusetts were solely based on the performance in the MD 14454 (Boston, MA) assessment area. Specific comments regarding the lending, investment, and service tests were discussed under the MD 14454 (Boston, MA) Full Review.

## METROPOLITAN AREA MD 14454 (Boston, MA)-- FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 1 of its 664 locations and 1 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 43 institutions operated 235 offices within this assessment area. M&T ranked 40<sup>th</sup> with no deposit market share. This assessment area generated approximately 0.1% by number and 0.3% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions such as State Street, Bank of America, Citizens Bank, and Santander.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

MD 14454 (Boston, MA) is a part of the MSA 14460 (Boston-Cambridge-Newton, MA-NJ). The MD 14454 (Boston, MA) assessment area included Suffolk County. According to the 2015 ACS the population of this assessment area was 758,919. The assessment area consisted of 204 census tracts, of which 47 or 23.0% were low-income, 64 or 31.4% were moderate-income, 45 or 22.1% were middle-income, 35 or 17.2% were upper-income, and 13 or 6.4% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MD 14454 (Boston, MA) assessment area had 147,054 families, of which 38.1% were low-income (16.3% of which were below the poverty level), 17.6% were moderate-income, 15.9% were middle-income, and 28.4% were upper-income.

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

<b>MD 14454 (Boston, MA)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$67,794	\$86,980	28.3%
MD 14454 (Boston, MA)	\$99,096	\$112,607	13.6%
Commonwealth of Massachusetts	\$95,147	\$106,526	12.0%

*Source: 2011 - 2015 U.S. Census Bureau American Community Survey.  
2016 - 2020 U.S. Census Bureau American Community Survey.  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

### *Housing Characteristics*

Based on the 2015 ACS data, the MD 14454 (Boston, MA) assessment area had 321,386 housing units, of which 32.9% were owner-occupied, 59.4% were rental, and 7.7% were vacant. Of the total housing units, 9.8% were located in low-income census tracts, 33.6% in moderate-income census tracts, 32.6% in middle-income census tracts, 23.0% in upper-income census tracts, and 1.0% in unknown-income census tracts. In low-income census tracts, 16.6% of housing units were owner-occupied, 75.2% were rental units, and 8.2% were vacant. In moderate-income census tracts, 30.7% of housing units were owner-occupied, 61.8% were rental units, and 7.5% were vacant.

The median age of housing stock in this assessment area was 61 years old, with 58.3% 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 2015 ACS, the median housing value in this assessment area was \$377,069 with an affordability ratio of 14.6. The median gross rent in the assessment area was \$1,298 per month.

<b>MD 14454 (Boston, MA) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$377,100	14.6	\$1,298
Suffolk County, MA	\$377,100	14.6	\$1,298
MD 14454 (Boston, MA)	\$370,715	19.1	\$1,279
Commonwealth of Massachusetts	\$333,100	20.6	\$1,102

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

### *Housing Cost Burden*

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 45.8% of all rental households had rental costs that exceeded 30% of their incomes, 68.3% of low-income rental households had rental costs that exceeded 30% of their income, and 47.8% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 28.8% of homeowners had housing costs that exceeded 30% of their incomes, 73.4% of low-income homeowners had housing costs that exceeded 30% of their income, and 47.9% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MD 14454 (Boston, MA) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	68.3%	47.8%	45.8%	73.4%	47.9%	28.8%
MD 14454 (Boston, MA)	69.1%	46.5%	45.2%	75.1%	46.8%	26.7%
Commonwealth of Massachusetts	70.4%	40.3%	44.3%	73.8%	45.0%	25.0%

*\*Cost Burden is housing cost that equals 30% or more of household income.*

*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.*

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 38,705 businesses operating in this assessment area in 2021, of which 13.5% were located in low-income census tracts and 23.1% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 87.8% were small businesses with a GAR of \$1 million or less, of which 13.8% were located in low-income census tracts and 24.5% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 2.8% in 2019, increased to 10.3% in 2020, and decreased to 6.0% in 2021. Massachusetts had an unemployment rate of 3.1% in 2019, increased to 9.4% in 2020, and decreased to 5.7% in 2021.

<b>MD 14454 (Boston, MA) Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	2.8%	10.3%	6.0%
MD 14454 (Boston, MA)	2.8%	9.7%	5.7%
Commonwealth of Massachusetts	3.1%	9.4%	5.7%

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

Additional performance context data for this assessment area is provided in the following MD 14454 (Boston, MA) Assessment Area Demographics Table:

<b>MD 14454 (Boston, MA) Assessment Area Demographics Table</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	47	23.0	33,171	22.6	10,112	30.5	56,067	38.1
Moderate-income	64	31.4	56,119	38.2	9,417	16.8	25,949	17.6
Middle-income	45	22.1	35,885	24.4	2,920	8.1	23,340	15.9
Upper-income	35	17.2	20,836	14.2	1,332	6.4	41,698	28.4
Unknown-income	13	6.4	1,043	0.7	163	15.6	0	0.0
<b>Total Assessment Area</b>	<b>204</b>	<b>100.0</b>	<b>147,054</b>	<b>100.0</b>	<b>23,944</b>	<b>16.3</b>	<b>147,054</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	62,424	10,375	9.8	16.6	46,957	75.2	5,092	8.2
Moderate-income	115,753	35,488	33.6	30.7	71,526	61.8	8,739	7.5
Middle-income	77,467	34,467	32.6	44.5	38,300	49.4	4,700	6.1
Upper-income	61,679	24,255	23.0	39.3	31,663	51.3	5,761	9.3
Unknown-income	4,063	1,086	1.0	26.7	2,555	62.9	422	10.4
<b>Total Assessment Area</b>	<b>321,386</b>	<b>105,671</b>	<b>100.0</b>	<b>32.9</b>	<b>191,001</b>	<b>59.4</b>	<b>24,714</b>	<b>7.7</b>
	Total Businesses by	Businesses by Tract & Revenue Size						
	<b>Tract</b>	<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		

	#	%	#	%	#	%	#	%
Low-income	5,229	13.5	4,704	13.8	489	11.2	36	10.3
Moderate-income	8,925	23.1	8,323	24.5	556	12.7	46	13.2
Middle-income	6,492	16.8	6,051	17.8	405	9.3	36	10.3
Upper-income	17,305	44.7	14,283	42.0	2,797	64.1	225	64.7
Unknown-income	754	1.9	632	1.9	117	2.7	5	1.4
<b>Total Assessment Area</b>	<b>38,705</b>	<b>100.0</b>	<b>33,993</b>	<b>100.0</b>	<b>4,364</b>	<b>100.0</b>	<b>348</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>87.8</b>		<b>11.3</b>		<b>.9</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	13	12.7	12	12.2	1	25.0	0	0.0
Moderate-income	21	20.6	21	21.4	0	0.0	0	0.0
Middle-income	23	22.5	22	22.4	1	25.0	0	0.0
Upper-income	44	43.1	42	42.9	2	50.0	0	0.0
Unknown-income	1	1.0	1	1.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>102</b>	<b>100.0</b>	<b>98</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>96.1</b>		<b>3.9</b>		<b>.0</b>

*2021 FFIEC Census Data and 2021 Dun and Bradstreet Information*

## Community Contact

Examiners conducted community contact interviews with two community organizations that served this assessment area. The first contact was held with a non-profit organization which provided community services to people in need. The contact stated that affordable housing was the largest challenge within the area. Additionally, there had been an increase in food pantry usage since COVID-19. The organization expressed a need for financial literacy classes for people to understand homeownership and credit. The contact also stated that there was a need for continued service or mentors to teach financial literacy in a less formal setting.

A second community contact interview was conducted with an organization dedicated to fighting poverty within the assessment area. The contact stated that the area had relatively low unemployment and rising wages, but not at the same pace as housing and food. The contact mentioned that there was a need for affordable housing and affordable childcare, in particular early education childcare. The organization would like to see more flexible bank products including alternative credit building loans, more flexible car loans, small dollar loans, better explanations of product/services to clients, reduced or no fee products, as well as more donations or grants.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST



M&T's performance was adequate in the lending test for this assessment area. The bank's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected adequate penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, very poor penetration among customers of different income levels and businesses of different sizes. The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the credit needs of this assessment area.

### Lending Activity

M&T lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. M&T had no reportable market share for deposits throughout the evaluation period, which helps to explain the low market share performance. Despite not having reported deposits in its assessment area, the bank's HMDA and small business market share ranking increased each year.

In 2021, the bank's total HMDA lending ranked 102<sup>nd</sup> out of 473 reporters with a market share of 0.1%, including market shares of 0.04% in home purchase lending, 0.1% in refinance, 0.0% in home improvement, and 0.0% in multifamily loans. M&T ranked 80<sup>th</sup> out of 158 reporters with a market share of 0.03% in small business lending.

In 2020, the bank's total HMDA lending ranked 110<sup>th</sup> out of 457 reporters with a market share of 0.1%, including market shares of 0.1% in home purchase lending, 0.03% in refinance, 0.0% home improvement, and 0.0% in multifamily loans. M&T ranked 83<sup>rd</sup> out of 174 reporters with a market share of 0.04% in small business lending.

In 2019, the bank's total HMDA lending ranked 137<sup>th</sup> out of 541 reporters with a market share of 0.04%, including market shares of 0.05% in home purchase lending, 0.05% in refinance, 0.0% home improvement, and 0.0% in multifamily loans. M&T ranked 89<sup>th</sup> out of 144 reporters with a market share of 0.01% in small business lending.

M&T Bank's lending in this assessment area is summarized in the following table:

<b>MD 14454 (Boston, MA)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Purchase	25	29.4%	19,511	23.2%
Loan Purpose Not Applicable	25	29.4%	8,328	9.9%
Multi-Family	3	3.5%	34,578	41.2%
Refinancing	32	37.6%	21,571	25.7%
<b>Total HMDA</b>	<b>85</b>	<b>81.7%</b>	<b>83,988</b>	<b>92.3%</b>
<b>Total Small Business</b>	<b>19</b>	<b>18.3%</b>	<b>6,982</b>	<b>7.7%</b>
<b>TOTAL LOANS</b>	<b>104</b>	<b>100.0%</b>	<b>90,970</b>	<b>100.0%</b>

### Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout the MD 14454 (Boston, MA) assessment area. Lending penetration in LMI tracts

was good for home purchase, excellent for refinance, very poor for home improvement, poor for multifamily, and adequate for small business loans.

**Gap Analysis**

M&T demonstrated an adequate level of dispersion in LMI census tracts in this assessment area. The bank’s performance in low-income census tracts slightly increased throughout the years. Performance in moderate-income census tracts increased from 2019 to 2020 and decreased in 2021. Overall, performance was generally consistent when compared to the previous evaluation period. The bank’s lending gap analysis in this assessment area is summarized in the table below.

<b>MD 14454 (Boston, MA)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	48	47	2.1%
Moderate	76	69	9.2%
Middle	94	83	11.7%
Upper	103	91	11.7%
Income Unknown	13	13	0.0%
<b>2020</b>			
Low	47	41	12.8%
Moderate	64	52	18.8%
Middle	45	38	15.6%
Upper	35	28	20.0%
Income Unknown	13	13	0.0%
<b>2021</b>			
Low	47	41	12.8%
Moderate	64	57	10.9%
Middle	45	39	13.3%
Upper	35	27	22.9%
Income Unknown	13	12	7.7%

**Home Purchase Loans**

The geographic distribution of home purchase loans reflected good penetration throughout this assessment area.

In 2021, the bank made 25.0% of home purchase loans by number and 37.1% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 9.8% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 10.9% by number and 10.2% by dollar in low-income census tracts. In 2021, the bank made 25.0% of home purchase loans by number and 13.8% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the 33.6% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 35.3% by number and 30.0% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made did not make any home purchase loans in low-income census tracts. The bank made 45.5% of home purchase loans by number and 43.9% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 33.6% of owner-occupied housing units located in moderate-income census tracts and was above the aggregate, which made 33.9% by number and 24.9% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made did not make any home purchase loans in low-income census tracts. The bank made 20.0% of home purchase loans by number and 11.1% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly above the 16.9% of owner-occupied housing units located in moderate-income census tracts and was similar to the aggregate, which made 19.7% by number and 17.2% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 14.3% by number and 10.1% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was above the 9.8% of owner-occupied housing units located in low-income census tracts and above the aggregate, which made 10.4% by number and 10.0% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 28.6% by number and 15.8% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 33.6% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 34.4% by number and 30.3% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank did not make any refinance loans in low-income census tracts. The bank made 50.0% by number and 16.0% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was above the 33.6% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 32.3% by number and 28.0% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank made 8.3% by number and 15.0% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly above the 3.8% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.3% by number and 4.3% by dollar of refinance loans in low-income census tracts. In 2019, the bank made 25.0% by number and 20.0% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was above the 16.9% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 17.1% by number and 14.9% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected very poor penetration throughout the assessment area. From 2019-2021, the bank did not make any home improvement loans in LMI census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected poor penetration throughout the assessment area.

In 2021, the bank made 66.7% by number and 49.2% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the 19.9% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 21.9% by number and 18.2% by dollar of multifamily loans in low-income census tracts. In 2021, the bank made 33.3% by number and 50.8% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was similar to the 30.6% of multifamily housing units located in moderate-income census tracts and slightly below the aggregate, which made 40.2% by number and 37.9% by dollar of multifamily loans in moderate-income census tracts.

In 2020 and 2019, the bank did not make any multifamily loans in LMI census tracts.

### ***Small Business Loans***

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

In 2021, the bank did not make any small business loans in low-income census tracts. The bank made 14.3% by number and 6.2% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was below the 23.1% of businesses located in moderate-income census tracts and below the aggregate, which made 28.1% by number and 19.2% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank did not make any small business loans in low-income census tracts. The bank made 33.3% by number and 58.6% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was above the 23.1% of businesses located in moderate-income census tracts and above the aggregate, which made 25.2% by number and 16.8% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank did not make any small business loans in low-income census tracts. The bank made 33.3% by number and 41.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly above the 15.2% of businesses located in moderate-income census tracts and significantly above the aggregate, which made 16.9% by number and 14.3% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, very poor penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to low- and moderate-income borrowers was very poor and lending to businesses with gross annual revenues of \$1 million or less was poor.

### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, very poor penetration among low-income customers and poor penetration among moderate-income customers for home purchase lending.

In 2020 and 2021, the bank did not make any loans to LMI borrowers.

In 2019, the bank did not make any loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 10.0% by number and 5.1% by dollar, was below the aggregate lending data at 15.2% by number and below the 9.0% by dollar, and below the 15.4% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, poor penetration among low-income customers and adequate penetration among moderate-income customers for refinance lending.

In 2021, the bank did not make any loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 14.3% by number and 6.8% by dollar, was similar to the aggregate lending data at 16.4% by number and below the 11.3% by dollar, and slightly below the 17.6% moderate-income families in the assessment area.

In 2020, the bank did not make any loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 16.7% by number and 4.3% by dollar, was above the aggregate lending data at 14.7% by number, below the 9.8% by dollar, and similar to the 17.6% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 8.3% by number and 4.2% by dollar and was above the aggregate lending data, at 3.7% by number and 1.7% by dollar. The bank's performance was below the 25.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 8.3% by number and 4.7% by dollar, was below the aggregate lending data at 13.7% by number and 8.7% by dollar, and below the 15.4% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, very poor penetration among low-income customers and very poor penetration among moderate-income customers for home improvement lending.

From 2019 to 2021, the bank did not make any loans to LMI borrowers.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, poor penetration among customers for small business lending.

In 2021, the bank originated 14.3% of loans by number and 42.8% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 40.8% by number and 42.8% by dollar, in addition to being significantly below the 87.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 14.3% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 11.1% of loans by number and 1.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 34.8% by number and 18.7% by dollar, in addition to being significantly below the 87.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated

33.3% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 33.3% of loans by number and 8.2% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 40.0% by number and 28.8% by dollar, in addition to being significantly below the 89.0% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank did not originate loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T was a leader in making community development loans in this assessment area. During the evaluation period, community development lending totaled 10 loans for approximately \$63.6 million, including 5 loans for \$25.2 million that benefited the BSRA. The community development lending in this assessment area represented 1.6% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance over 24 months of approximately \$31.8 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$24.4 million, this represented a 30.3% increase by dollar volume in performance. Additionally, based on annualized community development loans to deposits, the bank ranked 1<sup>st</sup> out of four compared to similarly situated banks that primarily served this assessment area.

The institution's community development loans by year and purpose are summarized in the table below.

MD 14454 (Boston, MA) Community Development Lending January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	2	16,950	0	0	0	0	1	1,808	3	18,758
2021	1	15,700	1	4,000	0	0	0	0	2	19,700
BSRA	2	10,497	2	10,708	0	0	1	3,981	5	25,186
<b>Total</b>	<b>5</b>	<b>43,147</b>	<b>3</b>	<b>14,708</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>5,789</b>	<b>10</b>	<b>63,644</b>

The following are examples of community development lending which benefited the assessment area:

- In 2021, the bank provided a \$15.7 million loan to finance the acquisition of 9 buildings with 73 residential units. All of the units were reserved for LMI families. Additionally, the buildings are located in a low-income census tract. This loan supported affordable housing for LMI families in this assessment area.

- In 2020, the bank originated one PPP loan in an amount greater than \$1 million, totaling approximately \$1.8 million, to an organization in a moderate-income census tract which helped to revitalize and stabilize this community.

### Innovative and/or Flexible Lending Practices

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### INVESTMENT TEST

M&T’s performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank rarely used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 59 qualified investments and grants totaling \$10.4 million in this assessment area, which included 1 prior period investment with a current balance of \$10.0 million and 58 grants totaling \$414,000. The bank did not have any new investments during the evaluation period. The community development activity in this assessment area represented 0.8% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance increased by 147.7%, with \$5.2 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$2.1 million at the previous evaluation. Based on annualized investments and grants to deposits, the bank ranked 1<sup>st</sup> out of four, compared to similarly situated banks that primarily served this assessment area. However, this performance was driven by the dollar amount of the prior period investment.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

MD 14454 (Boston, MA) Qualified Investments and Grants January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	1	10,000	0	0	0	0	1	10,000
<b>Total Investments</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>10,000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>10,000</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>58</b>	<b>414</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>58</b>	<b>414</b>
<b>Grand Total</b>	<b>0</b>	<b>0</b>	<b>59</b>	<b>10,414</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>59</b>	<b>10,414</b>

The following are examples of community development investments and grants that benefited this assessment area:

- The bank has one outstanding investment totaling \$10.0 million, which was a municipal bond made to a school in a low-income census tract.
- The bank's grants or donations were entirely comprised of funds to organizations that provided community services to LMI geographies or individuals.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited adequate responsiveness to assessment area credit and community development needs. Although the bank did not have any new qualified investments, the prior period investment promoted community services, which was a community development need within this assessment area. Additionally, qualified grants promoted community services towards LMI individuals, which was also an identified community development need within this assessment area.

### **Community Development Initiatives**

The bank rarely used innovative and/or complex investments to support community development initiatives.

### **SERVICE TEST**

M&T's performance was poor in the service test for this assessment area. Delivery systems were accessible to limited portions of the assessment area. To the extent changes were made, the bank's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services varied in a way that inconvenienced certain portions of this assessment area, particularly LMI census tracts or individuals. The bank provided a limited level of community development services in this assessment area.

### **Retail Services**

#### ***Accessibility of Delivery Systems***

Delivery systems were accessible to limited portions of the institution's assessment area. M&T operated one full-service branch in this assessment area, which was located in an upper-income tract. Although the bank maintained one offsite ATM in a moderate-income census tract, the ATM was cash-only.

#### ***Changes in Branch Locations***

To the extent changes were made, the institution's opening and closing of branches did not generally adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened, closed, or relocated during the evaluation period.

#### ***Reasonableness of Business Hours and Services***

Services varied in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. The one branch did not offer extended, weekend, or drive-thru hours and the ATM was cash-only.



The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### Community Development Services

M&T provided a limited level of community development services in this assessment area. The bank conducted two services during the evaluation period that addressed community services. This activity accounted for 0.1% of the bank’s total number of community development services activity. On an annualized basis over 24 months, the bank made 1.0 community development service, which was an improvement from the previous evaluation when the bank did not have any community development services.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MD 14454 (Boston, MA)</b>					
<b>Community Development Services</b>					
<b>January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	0	0	0	0	<b>0</b>
2021	0	2	0	0	<b>2</b>
<b>Total</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>

The following is an example of a community development service that benefited this assessment area:

- In 2021, one bank employee provided in-person financial literacy training to LMI individuals by hosting seminars in LMI geographies.

## STATE OF NEW JERSEY

### CRA RATING FOR NEW JERSEY: SATISFACTORY

*The Lending Test is rated: Low Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: Low Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout this assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses.
- Made a low level of community development loans.
- Made use of innovative and/or flexible lending practices in serving credit needs.

#### INVESTMENT TEST

- Made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Rarely used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were readily accessible to all portions of this assessment area.
- Record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

## **SCOPE OF EXAMINATION**

The evaluation of M&T's activities in the state of New Jersey consisted of a full-scope review of the MSA 45940 (Trenton-Princeton, NJ) assessment area. This assessment area was evaluated under full-scope procedures as it is the only assessment area in the state of New Jersey.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS**

M&T's state of New Jersey operations are entirely within the MSA 45940 (Trenton-Princeton, NJ). Please refer to the Description of Institution's Operations under MSA 45940 (Trenton-Princeton, NJ) Full Review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW JERSEY STATE**

Conclusions regarding M&T's performance in the state of New Jersey were solely based on the performance in MSA 45940 (Trenton-Princeton, NJ). Specific comments regarding the lending, investment, and service tests were discussed under the MSA 45940 (Trenton-Princeton, NJ) Full Review.

## METROPOLITAN AREA MSA 45940 (Trenton-Princeton, NJ) – FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank’s performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 1 of its 664 locations and 2 of its 1,882 ATMs in this assessment area.

According to the June 30, 2021 FDIC Summary of Deposit Report, 23 institutions operated 128 offices within this assessment area during the evaluation period. M&T ranked 21<sup>st</sup> with approximately \$48.6 million in deposits, which represented 0.2% of the deposit market share and accounted for 0.03% of the bank’s total branch deposits. This assessment area generated approximately 0.2% by number and 0.2% by dollar volume of the bank’s combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large financial institutions such as Bank of America, Wells Fargo, and PNC Bank.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The MSA 45940 (Trenton-Princeton, NJ) assessment area was comprised of Mercer County. According to the 2015 ACS, the population of this assessment area was 370,212. The assessment area consisted of 77 census tracts, of which 18 or 23.4% were low-income, 15 or 19.5% were moderate-income, 19 or 24.7% were middle-income, 24 or 31.2% were upper-income, and 1 or 1.3% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 45940 (Trenton-Princeton, NJ) assessment area had 88,299 families, of which 23.9% were low-income (8.0% of which were below the poverty level), 16.6% were moderate-income, 18.5% were middle-income, and 41.1% were upper-income.

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

<b>MSA 45940 (Trenton-Princeton, NJ)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$103,694	\$108,756	4.9%
Mercer County, NJ	\$103,694	\$108,756	4.9%
State of New Jersey	\$96,513	\$104,804	8.6%

Source: 2011 - 2015 U.S. Census Bureau American Community Survey.  
2016 - 2020 U.S. Census Bureau American Community Survey.  
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

***Housing Characteristics***

Based on the 2015 ACS data, the MSA 45940 (Trenton-Princeton, NJ) assessment area had 143,833 housing units, of which 58.4% were owner-occupied, 32.3% were rental, and 9.2% were vacant. Of the total housing units, 16.9% were located in low-income census tracts, 19.8% in moderate-income census tracts, 28.8% in middle-income census tracts, and 32.4% in upper-income census tracts. In low-income census tracts, 25.3% of housing units were owner-occupied, 54.5% were rental units, and 20.2% were vacant. In moderate-income census tracts, 50.0% of housing units were owner-occupied, 38.2% were rental units, and 11.8% were vacant.

The median age of housing stock in this assessment area was 52 years old, with 29.4% 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 2015 ACS, the median housing value in this assessment area was \$276,506 with an affordability ratio of 26.3. The median gross rent in the assessment area was \$1,132 per month.

<b>MSA 45940 (Trenton-Princeton, NJ) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$276,506	26.3	\$1,132
Mercer County, NJ	\$276,506	26.3	\$1,132
State of New Jersey	\$315,900	22.8	\$1,192

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

***Housing Cost Burden***

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 46.9% of all rental households had rental costs that exceeded 30% of their incomes, 74.2% of low-income rental households had rental costs that exceeded 30% of their income, and 39.6% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 25.6% of homeowners had housing costs that exceeded 30% of their incomes, 79.9% of low-income homeowners had housing costs that exceeded 30% of their income, and 41.9% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 45940 (Trenton-Princeton, NJ) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	74.2%	39.6%	46.9%	79.9%	41.9%	25.6%
Mercer County, NJ	74.2%	39.6%	46.9%	79.9%	41.9%	25.6%
State of New Jersey	78.0%	43.2%	46.7%	81.6%	55.1%	30.0%

*\*Cost Burden is housing cost that equals 30% or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.*

***Labor, Employment and Economic Characteristics***

According to D&B data, there were 17,495 businesses operating in this assessment area in 2021, of which 8.7% were located in low-income census tracts and 16.0% were located in moderate-income tracts. Of the total businesses operating in this assessment area, 89.3% were small businesses with a GAR of \$1 million or less, of which 8.6% were located in low-income census tracts and 16.1% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in this assessment area was 3.0% in 2019, increased to 7.2% in 2020, and decreased to 5.2% in 2021. The state of New Jersey had an unemployment rate of 3.4% in 2019, increased to 9.5% in 2020, and decreased to 6.3% in 2021.

<b>MSA 45940 (Trenton-Princeton, NJ)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.0%	7.2%	5.2%
Mercer County, NJ	3.0%	7.2%	5.2%
State of New Jersey	3.4%	9.5%	6.3%

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

Additional performance context data for this assessment area is provided in the following MSA 45940 (Trenton-Princeton, NJ) Assessment Area Demographics Table:

<b>MSA 45940 (Trenton-Princeton, NJ)</b>								
<b>Assessment Area Demographics Table</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	18	23.4	11,991	13.6	3,219	26.8	21,071	23.9
Moderate-income	15	19.5	16,032	18.2	1,938	12.1	14,681	16.6
Middle-income	19	24.7	25,702	29.1	1,159	4.5	16,294	18.5
Upper-income	24	31.2	34,574	39.2	721	2.1	36,253	41.1
Unknown-income	1	1.3	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>77</b>	<b>100.0</b>	<b>88,299</b>	<b>100.0</b>	<b>7,037</b>	<b>8.0</b>	<b>88,299</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	24,294	6,141	7.3	25.3	13,237	54.5	4,916	20.2
Moderate-income	28,499	14,236	16.9	50.0	10,888	38.2	3,375	11.8
Middle-income	41,392	27,113	32.3	65.5	11,581	28.0	2,698	6.5
Upper-income	49,648	36,555	43.5	73.6	10,795	21.7	2,298	4.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>143,833</b>	<b>84,045</b>	<b>100.0</b>	<b>58.4</b>	<b>46,501</b>	<b>32.3</b>	<b>13,287</b>	<b>9.2</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%

Low-income	1,517	8.7	1,348	8.6	148	8.8	21	11.1
Moderate-income	2,804	16.0	2,521	16.1	235	14.0	48	25.3
Middle-income	5,566	31.8	4,976	31.8	536	31.9	54	28.4
Upper-income	7,608	43.5	6,779	43.4	762	45.3	67	35.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>17,495</b>	<b>100.0</b>	<b>15,624</b>	<b>100.0</b>	<b>1,681</b>	<b>100.0</b>	<b>190</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>89.3</b>		<b>9.6</b>		<b>1.1</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	2	1.9	2	1.9	0	0.0	0	0.0
Moderate-income	5	4.8	5	4.8	0	0.0	0	0.0
Middle-income	25	23.8	25	23.8	0	0.0	0	0.0
Upper-income	73	69.5	73	69.5	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>105</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>100.0</b>		<b>.0</b>		<b>.0</b>

2021 FFIEC Census Data and 2021 Dun and Bradstreet Information.

## Community Contact

Examiners conducted community contact interviews with two community organizations that served this assessment area. The first contact was held with a community development and environmental organization that provided GED education, job readiness training, financial literacy, and other community services targeting LMI individuals. The organization noted that since COVID-19, the local economy was not completely back to pre-COVID levels. Many restaurants were still closed and there were more people going for financial counseling because more people were in financial stress. The organization explained that the forbearances during the pandemic did not help much considering that nothing really changes when the loan payments resumed. The organization noted a lack of banks in the area and a population of people who were unbanked. There was a general lack of financial literacy in the community such as how to handle the basics of day-to-day cash, credit money management, or credit scores even though many have ‘cash apps’ on their phones.

A second community contact interview was conducted with an organization that served low-income families with a variety of services including food pantries, work with at-risk families to prevent homelessness, on-the-job training, and job search mentoring. The organization noted a dramatic increase in rents since the pandemic. They acknowledged that renters were particularly vulnerable as landlords had been aggressively increasing rents in recent years, forcing some to spend 30-70% of their income on housing. The organization also stated that there was a population of underbanked in the area and that banks could do more to provide better products and services, such as offering more no- or low-fee products and accounts with no minimum balance requirements.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## LENDING TEST

M&T's performance was adequate in the lending test for this assessment area. The bank's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected adequate penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank made a low level of community development loans in this assessment area. The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs.

### Lending Activity

M&T's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. M&T's market share of deposits was generally stable during the evaluation period. The bank's HMDA market share slightly decreased each year and its small business market share remained stable as noted below.

In 2021, the bank ranked 21<sup>st</sup> out of 23 institutions with a deposit market share of 0.2%. In total HMDA lending, the bank ranked 44<sup>th</sup> out of 450 reporters with a market share of 0.4%, including market shares of 0.6% in home purchase lending, 0.3% in refinance, 1.3% in home improvement, and 0.0% in multifamily loans. M&T ranked 39<sup>th</sup> out of 131 reporters with a market share of 0.2% in small business lending.

In 2020, the bank ranked 22<sup>nd</sup> out of 25 institutions with a deposit market share of 0.3%. In total HMDA lending, the bank ranked 39<sup>th</sup> out of 439 reporters with a market share of 0.5%, including market shares of 0.9% in home purchase lending, 0.3% in refinance, 0.7% home improvement, and 0.0% in multifamily loans. M&T ranked 35<sup>th</sup> out of 140 reporters with a market share of 0.3% in small business lending.

In 2019, the bank ranked 21<sup>st</sup> out of 26 institutions with a deposit market share of 0.3%. In total HMDA lending, the bank ranked 25<sup>th</sup> out of 400 reporters with a market share of 0.7%, including market shares of 0.7% in home purchase lending, 0.5% in refinance, 1.1% home improvement, and 0.0% in multifamily loans. M&T ranked 36<sup>th</sup> out of 96 reporters with a market share of 0.2% in small business lending.

M&T's lending in this assessment area is summarized in the following table:

<b>MSA 45940 (Trenton-Princeton, NJ)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	15	5.9%	1,497	2.5%
Home Purchase	117	46.2%	27,698	45.5%
Loan Purpose Not Applicable	53	20.9%	7,848	12.9%
Refinancing	68	26.9%	23,889	39.2%
<b>Total HMDA</b>	<b>253</b>	<b>76.9%</b>	<b>60,932</b>	<b>82.3%</b>
<b>Total Small Business</b>	<b>76</b>	<b>23.1%</b>	<b>13,131</b>	<b>17.7%</b>
<b>TOTAL LOANS</b>	<b>329</b>	<b>100.0%</b>	<b>74,063</b>	<b>100.0%</b>

### Geographic Distribution of Loans



M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout the MSA 45940 (Trenton-Princeton, NJ) assessment area. Lending penetration in LMI tracts was excellent for home purchase, good for refinance, very poor for home improvement, very poor for multifamily, and poor for small business loans. Greater weight was given to HMDA lending based on loan volume.

**Gap Analysis**

M&T demonstrated an adequate level of dispersion in LMI census tracts in this assessment area. The bank's performance in low-income census tracts fluctuated throughout the review period but showed a general increasing trend. Performance in moderate-income census tracts was consistent for all years. Overall, performance generally improved when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 45940 (Trenton-Princeton, NJ)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 - December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	18	15	16.7%
Moderate	15	3	80.0%
Middle	19	6	68.4%
Upper	24	5	79.2%
Income Unknown	1	1	0.0%
<b>2020</b>			
Low	18	11	38.9%
Moderate	15	4	73.3%
Middle	19	2	89.5%
Upper	24	6	75.0%
Income Unknown	1	1	0.0%
<b>2021</b>			
Low	18	13	27.8%
Moderate	15	3	80.0%
Middle	19	3	84.2%
Upper	24	10	58.3%
Income Unknown	1	1	0.0%

**Home Purchase Loans**

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area.

In 2021, the bank made 19.4% of home purchase loans by number and 14.0% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 7.3% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.8% by number and 1.7% by dollar in low-income census tracts. In 2021, the bank made 38.9% of home purchase loans by number and 32.1% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 16.9% of owner-occupied

housing units located in moderate-income census tracts and was significantly above the aggregate, which made 17.8% by number and 11.4% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank 11.1% of home purchase loans by number and 4.9% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 7.3% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.7% by number and 1.3% by dollar in low-income census tracts. In 2020, the bank made 35.6% of home purchase loans by number and 22.0% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 16.9% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 16.3% by number and 10.6% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank 8.3% of home purchase loans by number and 2.4% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was similar the 7.3% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.6% by number and 1.1% by dollar in low-income census tracts. In 2019, the bank made 50.0% of home purchase loans by number and 35.6% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 16.9% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 18.4% by number and 11.1% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 7.4% by number and 2.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was similar to the 7.3% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.5% by number and 1.0% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 14.8% by number and 7.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was slightly below the 16.9% of owner-occupied housing units located in moderate-income census tracts and above the aggregate, which made 11.8% by number and 7.2% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 8.3% by number and 2.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was slightly above the 7.3% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.1% by number and 0.4% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 8.3% by number and 5.7% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 16.9% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 9.3% by number and 5.6% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank did not make any refinance loans in low-income census tracts. The bank made 5.9% by number and 1.6% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 16.9% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 11.3% by number and 6.4% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected very poor penetration throughout the assessment area.

In 2020 and 2021, the bank did not make any home improvement loans in LMI census tracts.

In 2019, the bank did not make any home improvement loans in low-income census tracts. The bank made 33.3% by number and 22.2% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly above the 16.9% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 11.9% by number and 7.4% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected very poor penetration throughout the assessment area. From 2019-2021, the bank did not make any multifamily loans in LMI census tracts.

### ***Small Business Loans***

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

In 2021, the bank did not make any small business loans in low-income census tracts. In 2021, the bank made 13.0% by number and 4.2% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 16.0% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 17.3% by number and 17.3% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 3.1% by number and 9.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was significantly below the 8.7% of businesses located in low-income census tracts and below the aggregate, which made 6.0% by number and 5.4% by dollar of small business loans in low-income census tracts. In 2020, the bank made 3.1% by number and 0.1% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly below the 16.0% of businesses located in moderate-income census tracts and significantly below the aggregate, which made 15.3% by number and 15.0% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank did not make any small business loans in low-income census tracts. In 2019, the bank made 4.8% by number and 0.8% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly below the 15.8% of businesses located in moderate-income census tracts and significantly below the aggregate, which made 15.6% by number and 14.2% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, excellent penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 33.3% by number and 23.9% by dollar to low-income borrowers and was above the 23.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 10.5% by number and 5.3% by dollar to low-income families. The bank's lending to moderate-income borrowers was 33.3% by number and 31.0% by dollar, which was significantly above the aggregate performance of 21.2% by number, significantly above 15.3% by dollar, and significantly above the 16.6% moderate-income families in the assessment area.

In 2020, the bank made 20.0% by number and 10.6% by dollar to low-income borrowers and was slightly below the 23.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 12.3% by number and 6.6% by dollar to low-income families. The bank's lending to moderate-income borrowers was 31.1% by number and 27.6% by dollar, which was above the aggregate performance of 24.5% by number, significantly above 18.2% by dollar, and significantly above the 16.6% moderate-income families in the assessment area.

In 2019, the bank made 38.9% by number and 22.3% by dollar to low-income borrowers and was significantly above the 23.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 12.3% by number and 6.1% by dollar to low-income families. The bank's lending to moderate-income borrowers was 16.7% by number and 16.5% by dollar, which was below the aggregate performance of 22.4% by number, similar to 15.5% by dollar, and similar to the 16.6% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, poor penetration among low-income customers and adequate penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 14.8% by number and 6.2% by dollar and was significantly above the aggregate lending data, at 5.2% by number and 2.5% by dollar. The bank's performance was below the 23.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 22.2% by number and 11.0% by dollar, was above the aggregate lending data at 15.4% by number, slightly above 9.9% by dollar, and above the 16.6% moderate-income families in the assessment area.

In 2020, the bank did not make any loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 12.5% by number and 7.2% by dollar, was similar to the aggregate lending data at 12.8% by number, slightly below 8.3% by dollar, and slightly below the 16.6% moderate-income families in the assessment area.

In 2019, the bank did not make any loans to low-income borrowers. The bank's lending to moderate-income borrowers, at 11.8% by number and 8.8% by dollar, was slightly below the aggregate lending data at 14.7% by number, similar to 9.5% by dollar, and below the 16.6% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, very poor penetration among low-income customers and very poor penetration among moderate-income customers for home improvement lending. From 2019-2021, the bank made no loans to LMI borrowers.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 47.8% of loans by number and 68.2% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 43.8% by number and 24.4% by dollar, in addition to being below the 89.3% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 69.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 53.1% of loans by number and 16.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 38.1% by number and 23.2% by dollar, in addition to being below the 89.3% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 65.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 52.4% of loans by number and 5.2% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 43.5% by number and 26.1% by dollar, in addition to being below the 89.0% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 61.9% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses**

The bank exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### **Community Development Lending**

M&T made a low level of community development loans in this assessment area. During the evaluation period, the bank did not make any community development loans. This is a decrease from the prior evaluation when the bank made 1 community development loan for \$2.0 million.

### **Innovative and/or Flexible Lending Practices**

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank's products and services in this assessment area were consistent with those discussed at the institution level.

### **INVESTMENT TEST**

M&T’s performance was adequate in the investment test for this assessment area. The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank rarely used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 79 qualified investments and grants totaling \$13.4 million in this assessment area, which included 41 investments totaling \$8.6 million that benefited the BSRA, 20 prior period investments with a current balance of \$2.5 million, and 18 grants totaling \$2.3 million. The bank did not have any new investments during the evaluation period. The community development activity in this assessment area represented 1.0% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments and grants performance increased since prior evaluation, with \$6.7 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$689,000 at the previous evaluation. However, this performance increase was largely driven by the dollar amount of the BSRA investments and grants. Based on annualized investments and grants to deposits, the bank ranked 1<sup>st</sup> out of four compared to similarly situated banks that primarily served this assessment area.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 45940 (Trenton-Princeton, NJ) Qualified Investments and Grants January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	20	2,493	0	0	0	0	0	0	20	2,493
BSRA	41	8,627	0	0	0	0	0	0	41	8,627
<b>Total Investments</b>	<b>61</b>	<b>11,120</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>61</b>	<b>11,120</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>18</b>	<b>2,322</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>18</b>	<b>2,322</b>
<b>Grand Total</b>	<b>61</b>	<b>11,120</b>	<b>18</b>	<b>2,322</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>79</b>	<b>13,442</b>

The following are examples of community development investments and grants that benefited the assessment area:

- The bank had 20 outstanding investments totaling \$1.2 million that consisted of mortgage-backed securities secured by residential home mortgage loans to LMI borrowers.
- The bank’s grants or donations were entirely comprised of funds to organizations that provide community services for LMI geographies or individuals.

### Responsiveness to Credit and Community Development Needs

M&T exhibited adequate responsiveness to assessment area credit and community development needs. Although the bank did not have any new qualified investments, all of the prior period investments promoted

affordable housing efforts, which was a community development need within this assessment area. Additionally, qualified grants promoted community services targeted to LMI individuals, which was also an identified community development need within this assessment area.

### **Community Development Initiatives**

The bank rarely used innovative and/or complex investments to support community development initiatives. M&T did not have any new qualified investments and prior period investments consisted of mortgage-backed securities, which were not particularly innovative or complex.

### **SERVICE TEST**

M&T's performance was adequate in the service test for this assessment area. Delivery systems were readily accessible to all portions of this assessment area. To the extent changes were made, the bank's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI census tracts or individuals. The bank provided an adequate level of community development services in this assessment area.

#### **Retail Services**

##### *Accessibility of Delivery Systems*

Delivery systems were readily accessible to all portions of this assessment area. M&T operated one full-service branch and two full-service ATMs in this assessment area. The bank maintained the branch and one ATM in a moderate-income census tract. As a result, the bank's branch (100%) and ATM (50%) were above the percentage of LMI census tracts in this MSA (42.9%) and the percentage of the population residing in LMI census tracts (34.5%).

##### *Changes in Branch Locations*

To the extent changes were made, the bank's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened, closed, or relocated during the evaluation period.

##### *Reasonableness of Business Hours and Services*

Services did not vary in a way that inconvenienced portions of the assessment area, particularly LMI census tracts or individuals. Although the bank's only branch in the assessment area was in a moderate-income tract, the branch did not offer extended, weekend, or drive-thru hours.

The bank's products and services in this assessment area were consistent with those discussed at the institution level.

#### **Community Development Services**

M&T provided an adequate level of community development services in this assessment area. The bank conducted 25 services during the evaluation period that primarily addressed community services. This activity accounted for 1.6% of the bank's total number of community development services activity. On an annualized basis over 24 months, the bank made 12.5 community development services, which represented a decrease from the previous evaluation's annualized performance of 19.8 community development

services. Additionally, the bank had 88 hours during the evaluation period, which on an annualized basis was 44.0 hours.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 45940 (Trenton-Princeton, NJ) Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	1	2	1	0	<b>4</b>
2021	12	9	0	0	<b>21</b>
<b>Total</b>	<b>13</b>	<b>11</b>	<b>1</b>	<b>0</b>	<b>25</b>

The following are examples of community development services that benefited this assessment area:

- In 2020 and 2021, three bank employees served on the board of directors for organizations dedicated to providing various services to LMI individuals. These organizations provided financial education, work-readiness, and other services targeting LMI populations within this assessment area.
- In 2020 and 2021, an employee served on the board of directors for a non-profit organization that promoted affordable housing and other services. The organization works with a network of community development corporations to strengthen their capacity to create affordable housing and revitalize distressed neighborhoods in this assessment area and throughout New Jersey.



## COMMONWEALTH OF VIRGINIA

### CRA RATING FOR VIRGINIA: SATISFACTORY

*The Lending Test is rated: High Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: Low Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout this assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving credit needs.

#### INVESTMENT TEST

- Made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those not routinely provided by private investors.
- Exhibited adequate responsiveness to credit and community development needs.
- Occasionally used innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

- Delivery systems were reasonably accessible to essentially all portions of the assessment area.
- Record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

## **SCOPE OF EXAMINATION**

The evaluation of M&T's activities in the Commonwealth of Virginia consisted of a full-scope review of the MSA 40060 (Richmond, VA) assessment area. This assessment area was evaluated under full-scope procedures as it was the only assessment area in the state of Virginia.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS**

M&T's Virginia operations were entirely within MSA 40060 (Richmond, VA). Please refer to the Description of Institution's Operations under the MSA 40060 (Richmond, VA) Full Review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA**

Conclusions regarding M&T's performance in the Commonwealth of Virginia were solely based on the performance in MSA 40060 (Richmond, VA). Specific comments regarding the lending, investment, and service tests were discussed under the MSA 40060 (Richmond, VA) Full Review.

## METROPOLITAN AREA MSA 40060 (RICHMOND, VA) - FULL REVIEW

### SCOPE OF EXAMINATION

Examiners used full-scope examination procedures to evaluate the bank's performance in this assessment area as detailed in Appendix A.

### DESCRIPTION OF INSTITUTION'S OPERATIONS

M&T operated 4 of its 664 locations and 9 of its 1,882 ATMs in this assessment area during the evaluation period.

According to the June 30, 2021 FDIC Summary of Deposit Report, 24 institutions operated 151 offices within this assessment area. M&T ranked 15<sup>th</sup> with approximately \$102.0 million in deposits, which represented 0.1% of the deposit market share and accounted for 0.1% of the bank's total branch deposits. This assessment area generated approximately 0.3% by number and 0.6% by dollar volume of the bank's combined total lending activity from January 1, 2019, to December 31, 2021. Competitors included large institutions such as Capital One Bank and Bank of America, as well as regional banks, such as Truist Bank and Atlantic Union Bank.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The MSA 40060 (Richmond, VA) assessment area included Hanover County, Henrico County, and Richmond City. According to the 2015 ACS, the population of this assessment area was 633,939. The assessment area consisted of 153 census tracts, of which 24 or 15.7% were low-income, 39 or 25.5% were moderate-income, 44 or 28.8% were middle-income, 44 or 28.8% were upper-income, and 2 or 1.3% were of unknown-income.

#### *Income Characteristics*

Based on the 2015 ACS, the MSA 40060 (Richmond, VA) assessment area had 148,277 families, of which 23.3% were low-income (10.4% of which were below the poverty level), 17.6% were moderate-income, 18.9% were middle-income, and 40.2% were upper-income.

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

<b>MSA 40060 (Richmond, VA) Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$79,621	\$89,793	12.8%
Hanover County, VA	\$100,149	\$108,375	8.2%
Henrico County, VA	\$84,917	\$94,680	11.5%

Richmond City, VA	\$54,964	\$68,988	25.5%
MSA 40060 (Richmond, VA)	\$82,143	\$91,165	11.0%
Commonwealth of Virginia	\$85,647	\$93,284	8.9%
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### Housing Characteristics

Based on the 2015 ACS data, the MSA 40060 (Richmond, VA) assessment area had 273,186 housing units, of which 53.3% were owner-occupied, 38.0% were rental, and 8.8% were vacant. Of the total housing units, 12.7% were located in low-income census tracts, 26.7% in moderate-income census tracts, 29.8% in middle-income census tracts, and 30.6% in upper-income census tracts and 0.2% in unknown-income census tracts. In low-income census tracts, 27.9% of housing units were owner-occupied, 59.0% were rental units, and 13.1% were vacant. In moderate-income census tracts, 41.3% of housing units were owner-occupied, 48.2% were rental units, and 10.5% were vacant.

The median age of housing stock in this assessment area was 47 years old, with 19.9% of the stock built before 1950. The median age of housing stock was 59 years in low-income tracts and 54 years in moderate-income tracts. According to the 2015 ACS, the median housing value in this assessment area was \$221,875 with an affordability ratio of 25.1. The median gross rent in the assessment area was \$970 per month.

<b>MSA 40060 (Richmond, VA) Housing Characteristics</b>			
<b>Area</b>	<b>2015 Median Housing Value</b>	<b>2015 Affordability Ratio</b>	<b>2015 Median Gross Rent</b>
Assessment Area	\$221,875	25.1	\$970
Hanover County, VA	\$255,400	30.8	\$1,044
Henrico County, VA	\$216,300	28.6	\$1,035
Richmond County, VA	\$193,700	21.0	\$896
MSA 40060 (Richmond, VA)	\$213,479	28.0	\$985
Commonwealth of Virginia	\$245,000	26.5	\$1,116
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey</i>			

### Housing Cost Burden

According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 46.3% of all rental households had rental costs that exceeded 30% of their incomes, 78.5% of low-income rental households had rental costs that exceeded 30% of their income, and 42.9% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 20.4% of homeowners had housing costs that exceeded 30% of their incomes, 64.8% of low-income homeowners had housing costs that exceeded 30% of their income, and 38.1% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

<b>MSA 40060 (Richmond, VA) Housing Cost Burden*</b>		
<b>Area</b>	<b>Cost Burden - Renters</b>	<b>Cost Burden - Owners</b>

	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	78.5%	42.9%	46.3%	64.8%	38.1%	20.4%
Hanover County, VA	72.0%	38.1%	35.1%	52.0%	33.7%	15.6%
Henrico County, VA	82.9%	46.7%	43.7%	65.4%	38.4%	19.8%
Richmond City, VA	76.3%	39.2%	50.3%	69.8%	40.7%	25.7%
MSA 40060 (Richmond, VA)	77.9%	42.2%	45.3%	62.5%	35.2%	19.7%
Commonwealth of Virginia	76.7%	45.4%	42.5%	61.0%	34.9%	19.9%

*\*Cost Burden is housing cost that equals 30% or more of household income  
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 36,560 businesses operating in this assessment area in 2021, of which 7.6% were located in low-income census tracts and 26.6% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.4% were small businesses with a GAR of \$1 million or less, of which 7.4% were located in low-income census tracts and 26.2% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 2.9% in 2019, increased to 7.0% in 2020, and decreased to 4.3% in 2021. The Commonwealth of Virginia had an unemployment rate of 2.8% in 2019, increased to 6.2% in 2020, and decreased to 3.9% in 2021.

MSA 40060 (Richmond, VA) Unemployment Rates			
Area	2019	2020	2021
Assessment Area	2.9%	7.0%	4.3%
Hanover County, VA	2.4%	4.8%	3.0%
Henrico County, VA	2.8%	6.4%	4.0%
Richmond City, VA	3.3%	8.8%	5.5%
MSA 40060 (Richmond, VA)	2.9%	6.6%	4.2%
Commonwealth of Virginia	2.8%	6.2%	3.9%

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

Additional performance context data for this assessment area is provided in the following MSA 40060 (Richmond, VA) Assessment Area Demographics Table:

MSA 40060 (Richmond, VA) Assessment Area Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	15.7	16,442	11.1	5,871	35.7	34,510	23.3
Moderate-income	39	25.5	34,716	23.4	5,218	15.0	26,139	17.6
Middle-income	44	28.8	47,558	32.1	3,264	6.9	28,009	18.9
Upper-income	44	28.8	49,534	33.4	1,059	2.1	59,619	40.2
Unknown-income	2	1.3	27	0.0	9	33.3	0	0.0

<b>Total Assessment Area</b>	<b>153</b>	<b>100.0</b>	<b>148,277</b>	<b>100.0</b>	<b>15,421</b>	<b>10.4</b>	<b>148,277</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		<b>#</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	34,700	9,689	6.7	27.9	20,459	59.0	4,552	13.1
Moderate-income	72,960	30,115	20.7	41.3	35,180	48.2	7,665	10.5
Middle-income	81,381	50,402	34.6	61.9	25,231	31.0	5,748	7.1
Upper-income	83,671	55,307	38.0	66.1	22,538	26.9	5,826	7.0
Unknown-income	474	51	0.0	10.8	304	64.1	119	25.1
<b>Total Assessment Area</b>	<b>273,186</b>	<b>145,564</b>	<b>100.0</b>	<b>53.3</b>	<b>103,712</b>	<b>38.0</b>	<b>23,910</b>	<b>8.8</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	2,764	7.6	2,484	7.4	262	9.2	18	6.0
Moderate-income	9,727	26.6	8,740	26.2	871	30.6	116	38.8
Middle-income	10,394	28.4	9,542	28.6	795	27.9	57	19.1
Upper-income	13,523	37.0	12,521	37.5	896	31.5	106	35.5
Unknown-income	152	0.4	126	0.4	24	0.8	2	0.7
<b>Total Assessment Area</b>	<b>36,560</b>	<b>100.0</b>	<b>33,413</b>	<b>100.0</b>	<b>2,848</b>	<b>100.0</b>	<b>299</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.4</b>		<b>7.8</b>		<b>.8</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	10	3.3	10	3.4	0	0.0	0	0.0
Moderate-income	27	9.0	27	9.3	0	0.0	0	0.0
Middle-income	138	45.8	135	46.4	3	30.0	0	0.0
Upper-income	126	41.9	119	40.9	7	70.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>301</b>	<b>100.0</b>	<b>291</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>96.7</b>		<b>3.3</b>		<b>.0</b>
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information</i>								

## Community Contacts

Examiners conducted community contact interviews with two community organizations that served this assessment area. The first community contact was held with an affordable housing provider that managed over 4,000 units, supporting over 10,000 LMI individuals and 3,000 LMI families throughout the city of Richmond. The organization noted a scarcity of housing stock and a shortage of affordable housing throughout the city and surrounding areas. This was especially true for the elderly, individuals on special assistance, and the homeless. There was a waitlist of over 13,000 applicants for housing. The increase in rents and housing costs were demanding an unreasonable and unsustainable percentage of household incomes. The contact anticipated increasing challenges in providing affordable housing given the slow pace of affordable housing construction and aging housing stock.

A second community contact interview was conducted with a foundation that guided philanthropy in the city of Richmond and its surrounding localities, including this assessment area. This contact similarly stated that affordable housing was a major cause for concern in this assessment area. Both organizations emphasized a need for local financial institutions to increase participation in the development, construction, and rehabilitation of affordable housing in the area and to work with LMI families and individuals on ways to obtain stable, affordable housing.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 40060 (RICHMOND, VA)

### LENDING TEST

M&T's performance was good in the lending test for this assessment area. The bank's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. The geographic distribution of loans reflected adequate penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of this assessment area, low-income individuals, and/or to very small businesses, consistent with safe and sound banking practices. The bank was a leader in making community development loans in this assessment area and used innovative and/or flexible lending practices in order to serve this assessment area's credit needs.

#### Lending Activity

M&T's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. The bank's HMDA market share was adequate and improved in ranking each year of the evaluation period. Small business lending market share was adequate and remained consistent throughout the evaluation period.

In 2021, the bank ranked 15<sup>th</sup> out of 24 institutions with a deposit market share of 0.1%. In total HMDA lending, the bank ranked 74<sup>th</sup> out of 547 reporters with a market share of 0.2%, including market shares of 0.1% in home purchase lending, 0.1% in refinance, 1.8% in home improvement, and 0.0% in multifamily loans. M&T ranked 22<sup>nd</sup> out of 149 reporters with a market share of 0.5% in small business lending.

In 2020, the bank ranked 15<sup>th</sup> out of 21 institutions with a deposit market share of 0.1%. In total HMDA lending, the bank ranked 68<sup>th</sup> out of 516 reporters with a market share of 0.2%, including market shares of 0.2% in home purchase lending, 0.1% in refinance, 2.0% home improvement, and 0.0% in multifamily loans. M&T ranked 21<sup>st</sup> out of 150 reporters with a market share of 0.8% in small business lending.

In 2019, the bank ranked 18<sup>th</sup> out of 22 institutions with a deposit market share of 0.1%. In total HMDA lending, the bank ranked 48<sup>th</sup> out of 482 reporters with a market share of 0.3%, including market shares of 0.2% in home purchase lending, 0.3% in refinance, 1.0% home improvement, and 0.9% in multifamily loans. M&T ranked 22<sup>nd</sup> out of 111 reporters with a market share of 0.4% in small business lending.

<b>MSA 40060 (Richmond, VA)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2021</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	53	20.5%	5,583	3.5%
Home Purchase	63	24.4%	15,569	9.8%

Loan Purpose Not Applicable	46	17.8%	8,104	5.1%
Multi-Family	5	1.9%	109,101	68.4%
Refinancing	91	35.3%	21,200	13.3%
<b>Total HMDA</b>	<b>258</b>	<b>45.5%</b>	<b>159,557</b>	<b>84.3%</b>
<b>Total Small Business</b>	<b>309</b>	<b>54.5%</b>	<b>29,679</b>	<b>15.7%</b>
<b>TOTAL LOANS</b>	<b>567</b>	<b>100.0%</b>	<b>189,236</b>	<b>100.0%</b>

### Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout the MSA 40060 (Richmond, VA) assessment area. Lending penetration in LMI tracts was good for home purchase, good for refinance, good for home improvement, adequate for multifamily, and adequate for small business loans. Small business lending performance received greater weight.

### Gap Analysis

M&T demonstrated a good level of dispersion in LMI census tracts in this assessment area. In 2019, the bank's performance was at 25.0% and 51.3%, in low-income and moderate-income census tracts, respectively, and showed an increase in 2020, with a decline in 2021. Overall, performance in this assessment area showed improvement when compared to the previous evaluation period. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MSA 40060 (Richmond, VA)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 to December 31, 2021</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	24	18	25.0%
Moderate	39	19	51.3%
Middle	44	20	54.5%
Upper	44	19	56.8%
Income Unknown	2	2	0.0%
<b>2020</b>			
Low	24	14	41.7%
Moderate	39	16	59.0%
Middle	44	12	72.7%
Upper	44	16	63.6%
Income Unknown	2	2	0.0%
<b>2021</b>			
Low	24	17	29.2%
Moderate	39	19	51.3%
Middle	44	12	72.7%
Upper	44	18	59.1%
Income Unknown	2	2	0.0%



### ***Home Purchase Loans***

The geographic distribution of home purchase loans reflected good penetration throughout this assessment area.

In 2021, the bank made 9.1% of home purchase loans by number and 10.7% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 6.7% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 9.4% by number and 6.8% by dollar in low-income census tracts. In 2021, the bank made 18.2% of home purchase loans by number and 14.9% by dollar in moderate-income census tracts. The bank's home purchase lending performance was slightly below the 20.7% of owner-occupied housing units located in moderate-income census tracts and was slightly below the aggregate, which made 23.1% by number and 18.4% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 8.7% of home purchase loans by number and 10.4% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 6.7% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 9.2% by number and 6.5% by dollar in low-income census tracts. In 2020, the bank made 34.8% of home purchase loans by number and 25.0% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 20.7% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 21.5% by number and 15.9% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 6.9% of home purchase loans by number and 4.8% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was similar to the 6.7% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made 8.7% by number and 5.9% by dollar in low-income census tracts. In 2019, the bank made 41.4% of home purchase loans by number and 35.2% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 20.7% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 21.3% by number and 15.1% by dollar of home purchase loans in moderate-income census tracts.

### ***Refinance Loans***

The geographic distribution of refinance loans reflected good penetration throughout the assessment area.

In 2021, the bank made 8.1% by number and 4.7% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was slightly above the 6.7% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.9% by number and 3.5% by dollar of refinance loans in low-income census tracts. In 2021, the bank made 27.0% by number and 19.8% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was above the 20.7% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 16.7% by number and 12.2% by dollar of refinance loans in moderate-income census tracts.

In 2020, the bank made 4.5% by number and 2.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was below the 6.7% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 4.0% by number and 2.7% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 9.1% by number and 3.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was significantly below the 20.7% of owner-

occupied housing units located in moderate-income census tracts and below the aggregate, which made 14.1% by number and 10.4% by dollar of refinance loans in moderate-income census tracts.

In 2019, the bank did not make any refinance loans in low-income census tracts. The bank made 21.9% by number and 13.2% by dollar of refinance loans in moderate-income census tracts. M&T's refinance lending performance in moderate-income census tracts was similar to the 20.7% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 17.6% by number and 12.6% by dollar of refinance loans in moderate-income census tracts.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area.

In 2021, the bank made 4.8% by number and 7.0% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 6.7% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 4.1% by number and 3.3% by dollar of home improvement loans in low-income census tracts. In 2021, the bank made 9.5% by number and 2.0% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was significantly below the 20.7% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 14.2% by number and 9.6% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 10.5% by number and 3.6% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly above the 6.7% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 4.4% by number and 2.8% by dollar of home improvement loans in low-income census tracts. In 2020, the bank made 15.8% by number and 7.2% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 20.7% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 12.6% by number and 10.4% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 15.4% by number and 4.1% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly above the 6.7% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 5.3% by number and 3.9% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 15.4% by number and 11.0% by dollar of home improvement loans in moderate-income census tracts. M&T's home improvement lending performance in moderate-income census tracts was below the 20.7% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 15.0% by number and 11.8% by dollar of home improvement loans in moderate-income census tracts.

### ***Multifamily Loans***

The geographic distribution of multifamily loans reflected adequate penetration throughout the assessment area.

In 2021, the bank made 50.0% by number and 12.9% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was significantly above the

18.8% of multifamily housing units located in low-income census tracts and significantly above the aggregate, which made 28.5% by number and 26.4% by dollar of multifamily loans in low-income census tracts. In 2021, the bank made 50.0% by number and 87.1% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was significantly above the 31.1% of multifamily housing units located in moderate-income census tracts and above the aggregate, which made 37.4% by number and 29.6% by dollar of multifamily loans in moderate-income census tracts.

In 2020, the bank did not make any multifamily loans in LMI census tracts.

In 2019, the bank did not make any multifamily loans in low-income census tracts. The bank made 33.3% by number and 35.7% by dollar of multifamily loans in moderate-income census tracts. M&T's multifamily lending performance in moderate-income census tracts was above the 31.1% of multifamily housing units located in moderate-income census tracts and slightly below the aggregate, which made 40.9% by number and 46.6% by dollar of multifamily loans in moderate-income census tracts.

### ***Small Business Loans***

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

In 2021, the bank made 6.1% by number and 7.8% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 7.6% of businesses located in low-income census tracts and similar to the aggregate, which made 6.7% by number and 7.7% by dollar of small business loans in low-income census tracts. In 2021, the bank made 22.2% by number and 20.3% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was slightly below the 26.6% of businesses located in moderate-income census tracts and similar to the aggregate, which made 24.5% by number and 26.8% by dollar of small business loans in moderate-income census tracts.

In 2020, the bank made 7.4% by number and 5.0% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 7.6% of businesses located in low-income census tracts and slightly above the aggregate, which made 6.5% by number and 6.9% by dollar of small business loans in low-income census tracts. In 2020, the bank made 19.5% by number and 20.6% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was below the 26.0% of businesses located in moderate-income census tracts and slightly below the aggregate, which made 24.0% by number and 26.0% by dollar of small business loans in moderate-income census tracts.

In 2019, the bank made 6.6% by number and 2.1% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 7.2% of businesses located in low-income census tracts and similar to the aggregate, which made 6.9% by number and 8.9% by dollar of small business loans in low-income census tracts. In 2019, the bank made 14.8% by number and 6.7% by dollar of small business loans in moderate-income census tracts. M&T's small business lending performance in moderate-income census tracts was significantly below the 26.2% of businesses located in moderate-income census tracts and below the aggregate, which made 25.6% by number and 27.4% by dollar of small business loans in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was good.

### ***Home Purchase Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and adequate penetration among moderate-income customers for home purchase lending.

In 2021, the bank made 18.2% by number and 16.3% by dollar to low-income borrowers and was slightly below the 23.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 7.6% by number and 4.2% by dollar to low-income families. The bank's lending to moderate-income borrowers was 9.1% by number and 6.9% by dollar, which was significantly below the aggregate performance of 21.9% by number, significantly below 16.0% by dollar, and below the 17.6% moderate-income families in the assessment area.

In 2020, the bank made 13.0% by number and 8.0% by dollar to low-income borrowers and was below the 23.3% of low-income families in the assessment area. Performance was above aggregate lending, which made 9.2% by number and 5.1% by dollar to low-income families. The bank's lending to moderate-income borrowers was 21.7% by number and 17.4% by dollar, which was similar to the aggregate performance of 23.4% by number, similar to 17.5% by dollar, and slightly above the 17.6% moderate-income families in the assessment area.

In 2019, the bank made 13.8% by number and 9.4% by dollar to low-income borrowers and was below the 23.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 7.3% by number and 3.8% by dollar to low-income families. The bank's lending to moderate-income borrowers was 31.0% by number and 30.7% by dollar, which was above the aggregate performance of 22.5% by number, significantly above 15.6% by dollar, and significantly above the 17.6% moderate-income families in the assessment area.

### ***Refinance Loans***

M&T's borrower distribution reflected, given the product lines offered, adequate penetration among low-income customers and good penetration among moderate-income customers for refinance lending.

In 2021, the bank's lending to low-income borrowers was 16.2% by number and 10.9% by dollar and was significantly above the aggregate lending data, at 6.8% by number and 3.9% by dollar. The bank's performance was below the 23.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 21.6% by number and 17.9% by dollar, was slightly above the aggregate lending data at 17.6% by number, above 12.7% by dollar, and slightly above the 17.6% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 4.5% by number and 2.8% by dollar and was similar to the aggregate lending data, at 5.0% by number and 2.7% by dollar. The bank's performance was significantly below the 23.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 13.6% by number and 6.9% by dollar, was similar to the aggregate lending data at 15.0% by number, below 10.6% by dollar, and slightly below the 17.6% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 3.1% by number and 1.6% by dollar and was significantly below the aggregate lending data, at 7.1% by number and 3.8% by dollar. The bank's

performance was significantly below the 23.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 21.9% by number and 15.7% by dollar, was above the aggregate lending data at 17.2% by number, above 12.0% by dollar, and slightly above the 17.6% moderate-income families in the assessment area.

### ***Home Improvement Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among low-income customers and excellent penetration among moderate-income customers for home improvement lending.

In 2021, the bank's lending to low-income borrowers was 4.8% by number and 0.8% by dollar and was slightly below the aggregate lending data, at 5.8% by number and 3.0% by dollar. The bank's performance was significantly below the 23.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 33.3% by number and 11.7% by dollar, was significantly above the aggregate lending data at 14.7% by number, slightly above 10.0% by dollar, and significantly above the moderate-income families in the assessment area at 17.6%.

In 2020, the bank's lending to low-income borrowers was 10.5% by number and 7.9% by dollar and was significantly above the aggregate lending data, at 5.4% by number and 3.6% by dollar. The bank's performance was significantly below the 23.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 26.3% by number and 18.9% by dollar, was significantly above the aggregate lending data at 12.5% by number, significantly above 8.9% by dollar, and above the moderate-income families in the assessment area at 17.6%.

In 2019, the bank's lending to low-income borrowers was 15.4% by number and 11.4% by dollar and was significantly above the aggregate lending data, at 6.4% by number and 4.3% by dollar. The bank's performance was below the 23.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 15.4% by number and 25.9% by dollar, was slightly below the aggregate lending data at 17.1% by number, significantly above 11.2% by dollar, and slightly below the moderate-income families in the assessment area at 17.6%.

### ***Small Business Loans***

M&T's borrower distribution reflected, given the product lines offered, good penetration among customers for small business lending.

In 2021, the bank originated 33.3% of loans by number and 25.7% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 49.2% by number and 29.1% by dollar, in addition to being significantly below the 91.4% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 72.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 43.0% of loans by number and 21.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was similar to the aggregate lending data, at 45.5% by number and 26.6% by dollar, in addition to being significantly below the 91.4% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 75.2% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 68.9% of loans by number and 66.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data, at 48.8% by number and 38.9% by dollar, in addition to being below the 90.7% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 78.7% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

### Community Development Lending

M&T was a leader in making community development loans. During the evaluation period, community development lending totaled 11 loans for approximately \$138.8 million, including 8 loans for \$80.1 million in the assessment area and 3 loans for \$58.7 million that benefited the BSRA. The community development lending in this assessment area represented 3.5% by dollar volume of the bank's total community development lending across all assessment areas. This lending level represented an annualized performance of approximately \$69.4 million. Compared to the previous evaluation where the bank had an annualized performance totaling \$17.9 million, this represented a significant increase in performance. Additionally, based on annualized community development loans to deposits, the bank ranked 1<sup>st</sup> out of three compared to similarly situated banks that primarily served this assessment area.

The institution's community development loans by year and purpose are summarized in the table below.

MSA 40060 (Richmond, VA) Community Development Lending January 1, 2020 to December 31, 2021										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	0	0	0	0	0	0	3	4,156	3	4,156
2021	2	56,295	1	17,000	0	0	2	2,658	5	75,953
BSRA	2	32,544	1	26,160	0	0	0	0	3	58,704
<b>Total</b>	<b>4</b>	<b>88,839</b>	<b>2</b>	<b>43,160</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>6,814</b>	<b>11</b>	<b>138,813</b>

The following are examples of community development lending that benefited the assessment area:

- In 2021, the bank provided a loan totaling \$17 million to finance the construction of a building with 118 affordable units in a low-income census tract. This loan supported community services for LMI families in the assessment area.
- In 2021, the bank provided a loan for \$55.8 million to refinance a 327-unit project in a moderate-income census tract. The majority of the units in the property will qualify as affordable housing. This loan supported affordable housing for LMI families in the assessment area.

- In 2020 and 2021, the bank provided 5 PPP loans for a total of \$6.8 million to support small businesses in LMI tracts in the assessment area.

### Innovative and/or Flexible Lending Practices

The bank used innovative and/or flexible lending practices in order to serve the assessment area credit needs. The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

### INVESTMENT TEST

M&T’s performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The bank exhibited adequate responsiveness to assessment area credit and community development needs. The bank occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The bank made an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. During the evaluation period, the bank reported 23 qualified investments and grants totaling approximately \$5.5 million in this assessment area, which included 13 prior period investments totaling \$4.6 million, 1 investment that benefited the BSRA totaling \$822,000 and 9 grants totaling \$120,000. The bank did not have any new qualified investments. The community development activity in this assessment area represented 0.4% by dollar volume of the bank’s total community development investments and grants across all assessment areas. On an annualized basis, qualified investments decreased, with \$2.8 million in annualized qualified investments and grants over 24 months at this evaluation compared to \$3.4 million in annualized qualified investments and grants at the previous evaluation. Based on annualized investments and grants to deposits, the bank ranked 1<sup>st</sup> out of three, compared to similarly situated banks that primarily served this assessment area. Although the bank ranked first, this performance was primarily driven by the dollar amount of prior period investments.

The institution’s qualified investments and grants by year and purpose are summarized in the table below.

<b>MSA 40060 (Richmond, VA) Qualified Investments and Grants January 1, 2020 to December 31, 2021</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	13	4,559	0	0	0	0	0	0	13	4,559
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0
BSRA	1	822	0	0	0	0	0	0	1	822
<b>Total Investments</b>	<b>14</b>	<b>5,381</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>14</b>	<b>5,381</b>
<b>Total Grants</b>	<b>0</b>	<b>0</b>	<b>9</b>	<b>120</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9</b>	<b>120</b>
<b>Grand Total</b>	<b>14</b>	<b>5,381</b>	<b>9</b>	<b>120</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>5,501</b>

The following are examples of community development grants that benefited the assessment area:

- In 2020 and 2021, the bank provided 2 grants totaling \$50,000 to an organization that teaches work readiness, entrepreneurship, and financial literacy to children between the grades of K-12. This program provides community services based around education and economic development to LMI families.
- In 2020 and 2021, the bank provided two grants totaling \$30,000 to a non-profit farm that provides fresh produce at an affordable price for individuals of all income levels. The organization manages a network of distribution programs and partnerships focused on getting produce and educational resources into communities with limited options. This program provides community services to LMI families.

### **Responsiveness to Credit and Community Development Needs**

M&T exhibited adequate responsiveness to assessment area credit and community development needs. The bank did not make any new investments. Prior period investments primarily promoted affordable housing efforts, which is a community development need within this assessment area. Qualified grants primarily promoted community services towards LMI individuals within the assessment area.

### **Community Development Initiatives**

The bank occasionally used innovative and/or complex investments to support community development initiatives. The bank's investments, including prior period, consisted of mortgage-backed securities and low-income housing tax credits.

### **SERVICE TEST**

M&T's performance was adequate in the service test for this assessment area. Delivery systems were reasonably accessible to essentially all portions of the assessment area, including LMI areas. To the extent changes were made, the institution's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or individuals. The bank provided an adequate level of community development services.

### **Retail Services**

#### *Accessibility of Delivery Systems*

Delivery systems were reasonably accessible to essentially all portions of the assessment area. M&T operated 4 full-service branches in this assessment area, of which 1 (25.0%) was in a moderate-income census tract. The bank maintained a total of 9 ATMs, 1 full-service ATM at each branch location and 5 offsite cash-only ATMs, of which 6 (66.7%) ATMs were in LMI census tracts. Although the percentage of branches was below both the percentage of LMI census tracts in this MSA (41.2%) and the percentage of the population residing in LMI census tracts (38.4%), the bank's percentage of ATMs was higher than both.

#### *Changes in Branch Locations*



To the extent changes were made, the institution’s opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened, closed, or relocated during the evaluation period.

***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI geographies and/or individuals. None of the branches offered extended hours; three (75.0%) branches offered weekend hours, including the branch in a moderate-income census tract; and all of the branches offered drive-thru hours.

The bank’s products and services in this assessment area were consistent with those discussed at the institution level.

**Community Development Services**

M&T provided an adequate level of services in this assessment area. The bank conducted seven services during the evaluation period that primarily addressed community services. This activity accounted for 0.4% of the bank’s total community development services activity. On an annualized basis, this represented a significant decrease as the bank made 3.5 community development services, compared to the previous exam’s annualized performance of 29.1 community development services.

The bank’s community development services by year and purpose are summarized in the table below.

<b>MSA 40060 (Richmond, VA Community Development Services January 1, 2020 to December 31, 2021</b>					
<b>Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020	0	0	0	0	<b>0</b>
2021	0	7	0	0	<b>7</b>
<b>Total</b>	<b>0</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>7</b>

*Source: Bank Data from January 1, 2020 to December 31, 2021*

The following is an example of community development services that benefited this assessment area:

- In 2021, two bank employees provided financial literacy trainings to LMI individuals by hosting seminars at organizations that provide community services geared towards credit repair, financial education, and budgeting. The topics of the presentations included budgeting and basic banking.

## APPENDICES

### APPENDIX A - SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b>		Lending: January 1, 2019 – December 31, 2021 Community Development Activity: January 1, 2020 – December 31, 2021	
<b>FINANCIAL INSTITUTION</b>			<b>PRODUCTS REVIEWED</b>
Manufacturers and Traders Trust Company  One M&T Plaza Buffalo, NY 14203			Home Purchase Refinancing Home Improvement Multifamily Small Business
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
M&T Realty Capital Corporation	Bank Subsidiary		Multifamily
M&T Real Estate Trust	Bank Subsidiary		Multifamily
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<b>MULTISTATE</b>			
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	Full-scope Review	None	None
MSA 19060 (Cumberland, MD-WV)	Full-scope Review	None	None
MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)	Full-scope Review	None	None
MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)	Full-scope Review	None	None
MSA 41540 (Salisbury, MD-DE)	Full-scope Review	None	None
MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	Full-scope Review	None	None
<b>STATE OF CONNECTICUT</b>			
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	Full-scope Review	None	None
<b>STATE OF DELAWARE</b>			
MSA 20100 (Dover, DE)	Full-scope Review	None	None
<b>STATE OF FLORIDA</b>			
MSA 38940 (Port St. Lucie, FL)	Limited-scope Review	None	None
MSA 42680 (Sebastian-Vero Beach, FL)	Limited-scope Review	None	None
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	Full-scope Review	None	None
<b>STATE OF MARYLAND</b>			
MSA 12580 (Baltimore-Columbia-Towson, MD)	Full-scope Review	None	None
MSA 15680 (California-Lexington Park, MD)	Limited-scope Review	None	None
MSA 25180 (Hagerstown-Martinsburg, MD)	Limited-scope Review	None	None
Non-Metropolitan Group A	Limited-scope Review	None	None
Non-Metropolitan Group B	Limited-scope Review	None	None
<b>STATE OF MASSACHUSETTS</b>			
MD 14454 (Boston, MA)	Full-scope Review	None	None
<b>STATE OF NEW JERSEY</b>			
MSA 45940 (Trenton-Princeton, NJ)	Full-scope Review	None	None
<b>STATE OF NEW YORK</b>			

MSA 10580 (Albany-Schenectady-Troy, NY)	Full-scope Review	None	None
MSA 13780 (Binghamton, NY)	Limited-scope Review	None	None
MSA 15380 (Buffalo-Cheektowaga, NY)	Full-scope Review	None	None
MSA 21300 (Elmira, NY)	Limited-scope Review	None	None
MSA 27060 (Ithaca, NY)	Limited-scope Review	None	None
MSA 28740 (Kingston, NY)	Limited-scope Review	None	None
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	Limited-scope Review	None	None
MSA 40380 (Rochester, NY)	Full-scope Review	None	None
MSA 45060 (Syracuse, NY)	Limited-scope Review	None	None
MSA 46540 (Utica-Rome, NY)	Limited-scope Review	None	None
MSA 48060 (Watertown-Ft. Drum, NY)	Limited-scope Review	None	None
Non-MSA Group A	Limited-scope Review	None	None
Non-MSA Group B	Limited-scope Review	None	None
Non-MSA Group C	Limited-scope Review	None	None
<b>STATE OF PENNSYLVANIA</b>			
MSA 11020 (Altoona, PA)	Limited-scope Review	None	None
MSA 14100 (Bloomsburg-Berwick, PA)	Limited-scope Review	None	None
MSA 16540 (Chambersburg-Waynesboro, PA)	Limited-scope Review	None	None
MSA 20700 (East Stroudsburg, PA)	Limited-scope Review	None	None
MSA 23900 (Gettysburg, PA)	Limited-scope Review	None	None
MSA 25420 (Harrisburg-Carlisle, PA)	Full-scope Review	None	None
MSA 29540 (Lancaster, PA)	Limited-scope Review	None	None
MSA 30140 (Lebanon, PA)	Limited-scope Review	None	None
MSA 39740 (Reading, PA)	Limited-scope Review	None	None
MSA 42540 (Scranton-Wilkes Barre, PA)	Limited-scope Review	None	None
MSA 44300 (State College, PA)	Limited-scope Review	None	None
MSA 48700 (Williamsport, PA)	Limited-scope Review	None	None
MSA 49620 (York-Hanover, PA)	Full-scope Review	None	None
Non-MSA Group A	Limited-scope Review	None	None
Non-MSA Group B	Limited-scope Review	None	None
Non-MSA Group C	Limited-scope Review	None	None
Non-MSA Group D	Limited-scope Review	None	None
<b>STATE OF VIRGINIA</b>			
MSA 40060 (Richmond, VA)	Full-scope Review	None	None

## APPENDIX B - SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

RATED AREA	LENDING TEST RATING	INVESTMENT TEST RATING	SERVICE TEST RATING	OVERALL RATING
<b>MULTISTATE MSA RATINGS</b>				
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
MSA 19060 (Cumberland, MD-WV)	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)*	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)	Outstanding	High Satisfactory	High Satisfactory	Outstanding
MSA 41540 (Salisbury, MD-DE)	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	Outstanding	High Satisfactory	High Satisfactory	Outstanding
<b>STATE RATINGS</b>				
Connecticut	Outstanding	High Satisfactory	Low Satisfactory	Satisfactory
Delaware	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Florida	Low Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
Maryland*	Outstanding	Outstanding	High Satisfactory	Outstanding
Massachusetts	Low Satisfactory	Low Satisfactory	Needs to Improve	Needs to Improve
New Jersey	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
New York*	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Pennsylvania*	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Virginia	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
<b>OVERALL</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Outstanding</b>

\*These assessment areas and ratings are weighted more heavily due to the significant volume of the bank's deposit and lending activity.

## APPENDIX C - GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Small loan(s) to business(es):** A loan included in 'loan to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

**APPENDIX D - HMDA & SMALL BUSINESS DISTRIBUTION REPORTS**

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 10900 (Allentown-Bethlm-Eastn, PA-NJ)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	2.8	4.6	110	1.3	2.5	3.1
Moderate	9	25.0	17.8	1,338	16.1	12.1	14.0
Middle	10	27.8	41.2	3,082	37.1	38.8	44.1
Upper	16	44.4	36.4	3,782	45.5	46.6	38.8
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	
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>8,312</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	3	6.4	2.0	144	2.5	1.1	3.1
Moderate	9	19.1	10.6	769	13.3	6.7	14.0
Middle	15	31.9	42.0	1,454	25.2	37.9	44.1
Upper	20	42.6	45.4	3,404	59.0	54.3	38.8
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	
<b>Total</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>5,771</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.8	0	0.0	2.2	
Moderate	2	8.0	10.1	65	2.6	8.9	14.0
Middle	15	60.0	43.6	1,759	71.3	41.5	44.1
Upper	8	32.0	44.5	642	26.0	47.5	38.8
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	
<b>Total</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>2,466</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	1	100.0	23.0	148	100.0	9.2	11.1
Moderate	0	0.0	25.7	0	0.0	26.4	27.4
Middle	0	0.0	40.1	0	0.0	45.2	42.0
Upper	0	0.0	11.2	0	0.0	19.2	19.5
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>148</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	6	4.1	3.8	460	2.1	2.5	3.1
Moderate	32	21.6	15.1	3,532	16.0	11.1	14.0
Middle	61	41.2	41.6	9,186	41.6	38.8	44.1
Upper	49	33.1	39.6	8,901	40.3	47.5	38.8
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	
<b>Total</b>	<b>148</b>	<b>100.0</b>	<b>100.0</b>	<b>22,079</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 10900 (Allentown-Bethlm-Eastn, PA-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	3	5.4	4.6	437	3.3	2.7	3	7.0	4.8	213	2.1	2.8	3.1
Moderate	6	10.7	17.9	1,150	8.6	12.3	7	16.3	19.7	1,030	10.2	14.0	14.0
Middle	22	39.3	40.3	4,798	36.1	38.2	18	41.9	40.6	4,082	40.3	39.0	44.1
Upper	25	44.6	37.2	6,910	52.0	46.8	15	34.9	34.8	4,801	47.4	44.2	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	56	100.0	100.0	13,295	100.0	100.0	43	100.0	100.0	10,126	100.0	100.0	100.0
<b>Refinance Loans</b>													
Low	1	2.1	1.5	30	0.3	0.8	3	3.8	1.7	313	2.4	1.0	3.1
Moderate	9	19.1	8.3	969	10.7	5.3	18	23.1	11.0	1,899	14.7	7.4	14.0
Middle	20	42.6	40.3	3,864	42.5	36.1	33	42.3	41.6	5,694	44.0	37.6	44.1
Upper	17	36.2	49.9	4,223	46.5	57.8	24	30.8	45.7	5,035	38.9	54.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	47	100.0	100.0	9,086	100.0	100.0	78	100.0	100.0	12,941	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
Low	0	0.0	1.4	0	0.0	0.8	1	5.3	2.1	35	2.6	1.9	3.1
Moderate	4	22.2	10.2	127	12.5	8.0	1	5.3	10.9	42	3.1	8.5	14.0
Middle	11	61.1	41.8	581	57.3	36.2	9	47.4	40.7	429	31.7	36.2	44.1
Upper	3	16.7	46.6	306	30.2	55.0	8	42.1	46.3	847	62.6	53.4	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	1,014	100.0	100.0	19	100.0	100.0	1,353	100.0	100.0	100.0
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	4	80.0	27.1	61,204	96.1	19.8	0	0.0	25.8	0	0.0	17.6	11.1
Moderate	0	0.0	34.0	0	0.0	48.6	1	100.0	33.9	194	100.0	24.1	27.4
Middle	1	20.0	33.0	2,500	3.9	28.9	0	0.0	33.0	0	0.0	34.6	42.0
Upper	0	0.0	5.9	0	0.0	2.6	0	0.0	7.3	0	0.0	23.7	19.5
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	5	100.0	100.0	63,704	100.0	100.0	1	100.0	100.0	194	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	12	5.9	3.0	61,968	62.3	3.1	8	4.8	3.1	640	2.2	2.8	3.1
Moderate	38	18.8	12.8	4,337	4.4	11.8	33	19.6	14.7	3,955	13.7	11.3	14.0
Middle	80	39.6	40.6	15,972	16.0	36.6	75	44.6	41.2	12,574	43.5	38.0	44.1
Upper	72	35.6	43.6	17,269	17.3	48.5	52	31.0	41.0	11,764	40.7	47.9	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	202	100.0	100.0	99,546	100.0	100.0	168	100.0	100.0	28,933	100.0	100.0	100.0

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 10900 (Allentown-Bethlm-Eastn, PA-NJ)							
Geographic Income Level	Bank And Aggregate Loans						Total Business %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	4	5.5	5.0	758	7.3	5.4	5.7
Moderate	11	15.1	15.1	187	1.8	14.8	15.7
Middle	25	34.2	38.9	4,282	41.0	39.2	41.4
Upper	33	45.2	39.6	5,208	49.9	39.7	37.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	1.0	
<b>Total</b>	<b>73</b>	<b>100.0</b>	<b>100.0</b>	<b>10,435</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: MSA 10900 (Allentown-Bethlm-Eastn, PA-NJ)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Business %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
Low	12	4.7	4.9	1,046	3.2	5.1	7	4.0	5.0	355	1.6	4.2	5.7	
Moderate	36	14.2	15.2	4,097	12.4	15.7	28	16.1	15.9	5,455	24.2	17.4	15.7	
Middle	99	39.1	39.9	13,902	42.2	40.1	73	42.0	39.5	9,379	41.6	39.7	40.5	
Upper	106	41.9	39.4	13,897	42.2	38.8	66	37.9	39.1	7,351	32.6	38.6	38.1	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.5	0	0.0	0.3	0	0.0	0.6	0	0.0	0.1		
<b>Total</b>	<b>253</b>	<b>100.0</b>	<b>100.0</b>	<b>32,942</b>	<b>100.0</b>	<b>100.0</b>	<b>174</b>	<b>100.0</b>	<b>100.0</b>	<b>22,540</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 10900 (Allentown-Bethlm-Eastn, PA-NJ)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	2.8	9.8	131	1.6	5.6	20.5
<b>Moderate</b>	11	30.6	23.8	1,909	23.0	18.6	18.1
<b>Middle</b>	10	27.8	22.9	2,482	29.9	23.0	21.1
<b>Upper</b>	13	36.1	30.1	2,534	30.5	40.4	40.3
<b>Unknown</b>	1	2.8	13.4	1,256	15.1	12.4	0.0
<b>Total</b>	36	100.0	100.0	8,312	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	8	17.0	6.6	499	8.6	3.5	20.5
<b>Moderate</b>	10	21.3	15.5	1,091	18.9	10.6	18.1
<b>Middle</b>	9	19.1	20.9	710	12.3	18.3	21.1
<b>Upper</b>	18	38.3	39.4	2,913	50.5	47.6	40.3
<b>Unknown</b>	2	4.3	17.6	558	9.7	20.0	0.0
<b>Total</b>	47	100.0	100.0	5,771	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	3	12.0	7.5	62	2.5	5.3	20.5
<b>Moderate</b>	4	16.0	16.2	100	4.1	13.7	18.1
<b>Middle</b>	7	28.0	23.7	346	14.0	21.0	21.1
<b>Upper</b>	9	36.0	49.4	738	29.9	53.8	40.3
<b>Unknown</b>	2	8.0	3.2	1,220	49.5	6.2	0.0
<b>Total</b>	25	100.0	100.0	2,466	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	12	8.2	8.4	692	3.2	4.8	20.5
<b>Moderate</b>	25	17.0	19.8	3,100	14.1	15.4	18.1
<b>Middle</b>	26	17.7	21.9	3,538	16.1	21.0	21.1
<b>Upper</b>	40	27.2	34.0	6,185	28.2	42.5	40.3
<b>Unknown</b>	44	29.9	15.9	8,416	38.4	16.3	0.0
<b>Total</b>	147	100.0	100.0	21,931	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 10900 (Allentown-Bethlm-Eastn, PA-NJ)													
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)	%	%	
<b>Home Purchase Loans</b>													
Low	3	5.4	9.3	371	2.8	5.4	8	18.6	9.5	945	9.3	5.7	20.5
Moderate	15	26.8	23.1	2,917	21.9	18.3	8	18.6	21.8	1,748	17.3	17.4	18.1
Middle	17	30.4	23.1	3,999	30.1	22.7	10	23.3	21.5	2,190	21.6	21.3	21.1
Upper	16	28.6	32.6	4,838	36.4	42.2	9	20.9	30.4	3,438	34.0	39.6	40.3
Unknown	5	8.9	11.9	1,170	8.8	11.4	8	18.6	16.7	1,805	17.8	16.0	0.0
<b>Total</b>	<b>56</b>	<b>100.0</b>	<b>100.0</b>	<b>13,295</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>10,126</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	6.4	3.5	130	1.4	1.7	13	16.7	5.7	1,209	9.3	3.2	20.5
Moderate	12	25.5	12.2	1,384	15.2	8.3	17	21.8	16.3	2,012	15.5	12.0	18.1
Middle	9	19.1	20.9	1,510	16.6	18.0	16	20.5	23.2	2,725	21.1	21.1	21.1
Upper	21	44.7	45.4	5,723	63.0	53.2	28	35.9	38.1	5,960	46.1	46.3	40.3
Unknown	2	4.3	18.0	339	3.7	18.8	4	5.1	16.6	1,035	8.0	17.4	0.0
<b>Total</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>9,086</b>	<b>100.0</b>	<b>100.0</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>12,941</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.3	0	0.0	3.1	5	26.3	7.5	220	16.3	5.4	20.5
Moderate	7	38.9	15.8	339	33.4	12.2	1	5.3	14.1	25	1.8	11.3	18.1
Middle	5	27.8	21.9	247	24.4	20.0	4	21.1	22.0	422	31.2	18.9	21.1
Upper	5	27.8	54.3	368	36.3	60.4	8	42.1	53.8	596	44.1	59.1	40.3
Unknown	1	5.6	2.7	60	5.9	4.3	1	5.3	2.7	90	6.7	5.4	0.0
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>1,014</b>	<b>100.0</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>1,353</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	6	3.0	5.8	501	1.4	3.3	26	15.6	7.2	2,374	8.3	4.3	20.5
Moderate	34	17.3	16.3	4,640	12.9	12.4	26	15.6	18.2	3,785	13.2	14.3	18.1
Middle	31	15.7	21.0	5,756	16.1	19.5	30	18.0	22.4	5,337	18.6	21.0	21.1
Upper	42	21.3	39.1	10,929	30.5	47.3	45	26.9	35.5	9,994	34.8	43.3	40.3
Unknown	84	42.6	17.8	14,016	39.1	17.6	40	24.0	16.7	7,249	25.2	17.0	0.0
<b>Total</b>	<b>197</b>	<b>100.0</b>	<b>100.0</b>	<b>35,842</b>	<b>100.0</b>	<b>100.0</b>	<b>167</b>	<b>100.0</b>	<b>100.0</b>	<b>28,739</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 10900 (Allentown-Bethlm-Eastn, PA-NJ)							
	Bank And Aggregate Loans						Total Businesses s %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
\$1 Million or Less	45	61.6	47.6	2,921	28.0	35.1	91.2
Over \$1 Million	26	35.6		6,378	61.1		7.6
Revenue Unknown	2	2.7		1,136	10.9		1.2
<b>Total</b>	<b>73</b>	<b>100.0</b>		<b>10,435</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	52	71.2	93.8	1,186	11.4	40.8	
\$100,001 - \$250,000	5	6.8	3.3	879	8.4	16.3	
\$250,001 - \$1 Million	16	21.9	2.9	8,370	80.2	42.9	
<b>Total</b>	<b>73</b>	<b>100.0</b>	<b>100.0</b>	<b>10,435</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	40	88.9		743	25.4		
\$100,001 - \$250,000	1	2.2		160	5.5		
\$250,001 - \$1 Million	4	8.9		2,018	69.1		
<b>Total</b>	<b>45</b>	<b>100.0</b>		<b>2,921</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 10900 (Allentown-Bethlm-Eastn, PA-NJ)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>													
\$1 Million or Less	102	40.3	42.2	8,107	24.6	29.2	52	29.9	49.7	5,483	24.3	29.5	91.1
Over \$1 Million	77	30.4		20,493	62.2		49	28.2		13,183	58.5		7.7
Revenue Unknown	74	29.2		4,342	13.2		73	42.0		3,874	17.2		1.3
<b>Total</b>	<b>253</b>	<b>100.0</b>		<b>32,942</b>	<b>100.0</b>		<b>174</b>	<b>100.0</b>		<b>22,540</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	171	67.6	87.5	6,025	18.3	33.2	124	71.3	91.3	4,093	18.2	34.8	
\$100,001 - \$250,000	46	18.2	7.6	7,431	22.6	22.1	23	13.2	5.0	3,941	17.5	20.0	
\$250,001 - \$1 Million	36	14.2	5.0	19,486	59.2	44.8	27	15.5	3.6	14,506	64.4	45.3	
<b>Total</b>	<b>253</b>	<b>100.0</b>	<b>100.0</b>	<b>32,942</b>	<b>100.0</b>	<b>100.0</b>	<b>174</b>	<b>100.0</b>	<b>100.0</b>	<b>22,540</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	89	87.3		2,733	33.7		41	78.8		1,142	20.8		
\$100,001 - \$250,000	6	5.9		918	11.3		5	9.6		841	15.3		
\$250,001 - \$1 Million	7	6.9		4,456	55.0		6	11.5		3,500	63.8		
<b>Total</b>	<b>102</b>	<b>100.0</b>		<b>8,107</b>	<b>100.0</b>		<b>52</b>	<b>100.0</b>		<b>5,483</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 19060 (Cumberland, MD-WV)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.9	0	0.0	9.3	12.8
Middle	13	72.2	67.4	2,044	87.1	68.5	69.0
Upper	5	27.8	20.6	303	12.9	22.2	18.2
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	
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>2,347</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	9.4	8.6	155	5.8	7.0	12.8
Middle	23	71.9	73.0	1,883	70.7	76.5	69.0
Upper	6	18.8	18.5	627	23.5	16.5	18.2
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	
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>2,665</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	8.3	9.3	86	6.0	8.8	12.8
Middle	18	75.0	68.6	1,005	69.6	73.4	69.0
Upper	4	16.7	22.1	354	24.5	17.7	18.2
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	
<b>Total</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>1,445</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	30.8	0	0.0	30.9	27.7
Middle	0	0.0	53.8	0	0.0	65.7	47.7
Upper	0	0.0	15.4	0	0.0	3.4	24.6
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	6.4	10.5	241	3.6	10.6	12.8
Middle	56	71.8	69.6	5,093	75.5	70.9	69.0
Upper	17	21.8	19.8	1,408	20.9	18.4	18.2
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	
<b>Total</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>6,742</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 19060 (Cumberland, MD-WV)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
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	10.8	0	0.0	8.8	1	3.7	12.5	107	3.0	9.3	12.8
Middle	10	76.9	67.7	1,033	79.0	68.3	21	77.8	65.6	2,530	71.9	66.3	69.0
Upper	3	23.1	21.5	274	21.0	22.9	5	18.5	21.9	883	25.1	24.5	18.2
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	
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,307</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>3,520</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	15.8	9.7	651	18.3	7.5	5	12.2	8.6	415	10.6	6.9	12.8
Middle	24	63.2	70.3	2,242	63.1	72.4	28	68.3	71.0	2,657	67.7	71.7	69.0
Upper	8	21.1	20.0	661	18.6	20.1	8	19.5	20.5	852	21.7	21.5	18.2
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	
<b>Total</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>3,554</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>3,924</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	11.5	0	0.0	8.2	2	8.0	10.0	34	2.5	6.6	12.8
Middle	11	73.3	68.9	470	77.7	74.2	18	72.0	68.0	1,021	75.7	71.7	69.0
Upper	4	26.7	19.7	135	22.3	17.6	5	20.0	22.0	293	21.7	21.7	18.2
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	
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>605</b>	<b>100.0</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>1,348</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
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	31.6	0	0.0	58.7	0	0.0	33.3	0	0.0	78.2	27.7
Middle	0	0.0	47.4	0	0.0	17.0	3	75.0	42.9	1,565	83.8	13.3	47.7
Upper	0	0.0	21.1	0	0.0	24.3	1	25.0	23.8	303	16.2	8.5	24.6
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,868</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	8.5	10.4	651	10.9	9.6	8	8.2	10.9	556	5.2	13.2	12.8
Middle	49	69.0	68.9	4,185	70.3	68.8	71	72.4	68.1	7,845	73.1	65.0	69.0
Upper	16	22.5	20.7	1,115	18.7	21.5	19	19.4	21.0	2,331	21.7	21.9	18.2
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	
<b>Total</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>5,951</b>	<b>100.0</b>	<b>100.0</b>	<b>98</b>	<b>100.0</b>	<b>100.0</b>	<b>10,732</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 19060 (Cumberland, MD-WV)							
Geographic Income Level	Bank And Aggregate Loans						Total Business %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	7.3	11.5	278	5.7	15.8	14.5
Middle	82	66.1	64.3	2,838	58.3	65.2	63.6
Upper	33	26.6	22.0	1,751	36.0	17.9	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.3	0	0.0	1.1	
<b>Total</b>	<b>124</b>	<b>100.0</b>	<b>100.0</b>	<b>4,867</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: MSA 19060 (Cumberland, MD-WV)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Business %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	28	12.9	13.0	1,847	11.1	11.3	34	16.5	11.2	2,054	15.0	9.9	14.9	
Middle	130	59.9	59.2	9,232	55.5	54.4	111	53.9	62.9	7,582	55.4	54.8	62.5	
Upper	59	27.2	27.2	5,557	33.4	34.1	61	29.6	25.4	4,053	29.6	35.3	22.6	
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	0.6	0	0.0	0.2	0	0.0	0.5	0	0.0	0.1		
<b>Total</b>	<b>217</b>	<b>100.0</b>	<b>100.0</b>	<b>16,636</b>	<b>100.0</b>	<b>100.0</b>	<b>206</b>	<b>100.0</b>	<b>100.0</b>	<b>13,689</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	



<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 19060 (Cumberland, MD-WV)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	3	16.7	9.7	152	6.5	5.7	21.3
<b>Moderate</b>	0	0.0	20.6	0	0.0	16.6	18.2
<b>Middle</b>	4	22.2	19.9	522	22.2	20.2	20.1
<b>Upper</b>	9	50.0	26.1	1,550	66.0	34.2	40.4
<b>Unknown</b>	2	11.1	23.7	123	5.2	23.3	0.0
<b>Total</b>	18	100.0	100.0	2,347	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	4	12.5	9.3	175	6.6	5.6	21.3
<b>Moderate</b>	5	15.6	13.1	374	14.0	9.1	18.2
<b>Middle</b>	8	25.0	24.5	627	23.5	21.0	20.1
<b>Upper</b>	14	43.8	41.7	1,397	52.4	49.5	40.4
<b>Unknown</b>	1	3.1	11.4	92	3.5	14.9	0.0
<b>Total</b>	32	100.0	100.0	2,665	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	7	29.2	15.1	250	17.3	10.2	21.3
<b>Moderate</b>	2	8.3	11.6	100	6.9	11.4	18.2
<b>Middle</b>	7	29.2	26.7	205	14.2	19.2	20.1
<b>Upper</b>	8	33.3	45.3	890	61.6	58.4	40.4
<b>Unknown</b>	0	0.0	1.2	0	0.0	0.8	0.0
<b>Total</b>	24	100.0	100.0	1,445	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	14	17.9	9.4	577	8.6	5.6	21.3
<b>Moderate</b>	7	9.0	17.6	474	7.0	13.9	18.2
<b>Middle</b>	19	24.4	21.4	1,354	20.1	20.2	20.1
<b>Upper</b>	31	39.7	31.6	3,837	56.9	38.8	40.4
<b>Unknown</b>	7	9.0	20.0	500	7.4	21.6	0.0
<b>Total</b>	78	100.0	100.0	6,742	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 19060 (Cumberland, MD-WV)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	15.4	8.8	202	15.5	4.9	3	11.1	7.8	247	7.0	4.6	21.3
Moderate	6	46.2	21.6	576	44.1	17.6	7	25.9	20.4	1,049	29.8	15.9	18.2
Middle	3	23.1	23.5	445	34.0	23.7	7	25.9	17.2	804	22.8	17.1	20.1
Upper	0	0.0	25.8	0	0.0	35.2	5	18.5	27.5	1,006	28.6	36.9	40.4
Unknown	2	15.4	20.3	84	6.4	18.6	5	18.5	27.1	414	11.8	25.6	0.0
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,307</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>3,520</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	7.9	4.1	172	4.8	1.9	3	7.3	5.4	175	4.5	2.9	21.3
Moderate	9	23.7	13.2	473	13.3	8.7	5	12.2	13.2	437	11.1	9.7	18.2
Middle	8	21.1	18.0	563	15.8	14.3	14	34.1	19.6	1,246	31.8	15.8	20.1
Upper	14	36.8	45.4	1,932	54.4	55.2	18	43.9	41.9	2,034	51.8	49.7	40.4
Unknown	4	10.5	19.3	414	11.6	19.9	1	2.4	19.9	32	0.8	21.9	0.0
<b>Total</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>3,554</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>3,924</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	8.2	0	0.0	6.0	2	8.0	8.0	70	5.2	6.7	21.3
Moderate	4	26.7	16.4	100	16.5	13.5	6	24.0	19.0	265	19.7	15.7	18.2
Middle	5	33.3	32.8	135	22.3	32.9	2	8.0	18.0	187	13.9	21.9	20.1
Upper	6	40.0	42.6	370	61.2	47.6	14	56.0	53.0	798	59.2	54.3	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	1	4.0	2.0	28	2.1	1.4	0.0
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>605</b>	<b>100.0</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>1,348</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	5	7.0	6.4	374	6.3	3.4	8	8.5	6.6	492	5.6	3.8	21.3
Moderate	19	26.8	17.2	1,149	19.3	13.1	18	19.1	16.8	1,751	19.8	12.9	18.2
Middle	16	22.5	20.8	1,143	19.2	19.0	23	24.5	18.0	2,237	25.2	16.4	20.1
Upper	20	28.2	34.4	2,302	38.7	43.9	37	39.4	34.8	3,838	43.3	42.7	40.4
Unknown	11	15.5	21.2	983	16.5	20.6	8	8.5	23.8	546	6.2	24.1	0.0
<b>Total</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>5,951</b>	<b>100.0</b>	<b>100.0</b>	<b>94</b>	<b>100.0</b>	<b>100.0</b>	<b>8,864</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 19060 (Cumberland, MD-WV)													
	Bank And Aggregate Loans						Total Businesses %						
	Bank		Agg	Bank		Agg							
	#	%	%	\$(000)	%	%							
<b>By Revenue</b>													
\$1 Million or Less	79	63.7	38.0	1,575	32.4	31.6	89.9						
Over \$1 Million	44	35.5		3,142	64.6		8.3						
Revenue Unknown	1	0.8		150	3.1		1.7						
<b>Total</b>	<b>124</b>	<b>100.0</b>		<b>4,867</b>	<b>100.0</b>		<b>100.0</b>						
<b>By Loan Size</b>													
\$100,000 or Less	115	92.7	94.4	3,002	61.7	48.6							
\$100,001 - \$250,000	6	4.8	3.3	965	19.8	16.0							
\$250,001 - \$1 Million	3	2.4	2.3	900	18.5	35.4							
<b>Total</b>	<b>124</b>	<b>100.0</b>	<b>100.0</b>	<b>4,867</b>	<b>100.0</b>	<b>100.0</b>							
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	78	98.7		1,450	92.1								
\$100,001 - \$250,000	1	1.3		125	7.9								
\$250,001 - \$1 Million	0	0.0		0	0.0								
<b>Total</b>	<b>79</b>	<b>100.0</b>		<b>1,575</b>	<b>100.0</b>								
Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 19060 (Cumberland, MD-WV)													
	Bank And Aggregate Loans By Year												
	2020						2021						Total Businesses %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	102	47.0	28.4	4,213	25.3	17.4	83	40.3	45.0	3,724	27.2	27.6	90.0
Over \$1 Million	53	24.4		8,520	51.2		42	20.4		5,166	37.7		8.1
Revenue Unknown	62	28.6		3,903	23.5		81	39.3		4,799	35.1		1.9
<b>Total</b>	<b>217</b>	<b>100.0</b>		<b>16,636</b>	<b>100.0</b>		<b>206</b>	<b>100.0</b>		<b>13,689</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	168	77.4	84.7	5,422	32.6	31.5	176	85.4	88.9	5,561	40.6	34.8	
\$100,001 - \$250,000	37	17.1	9.8	5,643	33.9	26.8	19	9.2	7.1	3,198	23.4	24.3	
\$250,001 - \$1 Million	12	5.5	5.5	5,571	33.5	41.7	11	5.3	4.0	4,930	36.0	40.9	
<b>Total</b>	<b>217</b>	<b>100.0</b>	<b>100.0</b>	<b>16,636</b>	<b>100.0</b>	<b>100.0</b>	<b>206</b>	<b>100.0</b>	<b>100.0</b>	<b>13,689</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	91	89.2		2,432	57.7		78	94.0		2,255	60.6		
\$100,001 - \$250,000	11	10.8		1,781	42.3		2	2.4		288	7.7		
\$250,001 - \$1 Million	0	0.0		0	0.0		3	3.6		1,181	31.7		
<b>Total</b>	<b>102</b>	<b>100.0</b>		<b>4,213</b>	<b>100.0</b>		<b>83</b>	<b>100.0</b>		<b>3,724</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 35620 (NY-Newark-Jersey City, NY-NJ-PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	95	6.3	4.1	36,236	6.1	3.2	2.9
Moderate	347	22.9	15.5	100,793	17.0	12.4	13.5
Middle	638	42.1	36.8	211,373	35.6	31.5	36.7
Upper	434	28.7	43.5	245,269	41.3	52.9	46.8
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1,514</b>	<b>100.0</b>	<b>100.0</b>	<b>593,671</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	35	3.1	3.6	10,655	2.4	3.0	2.9
Moderate	115	10.1	12.7	37,657	8.3	10.4	13.5
Middle	354	30.9	35.7	113,761	25.2	29.3	36.7
Upper	640	55.9	48.0	289,467	64.1	57.2	46.8
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1,144</b>	<b>100.0</b>	<b>100.0</b>	<b>451,540</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	26	4.5	2.2	2,666	4.2	2.3	2.9
Moderate	77	13.2	10.2	7,360	11.6	9.5	13.5
Middle	215	36.9	35.7	19,484	30.6	30.5	36.7
Upper	265	45.5	52.0	34,131	53.6	57.6	46.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>583</b>	<b>100.0</b>	<b>100.0</b>	<b>63,641</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	3	5.2	19.8	11,845	1.0	16.8	18.4
Moderate	8	13.8	32.4	90,150	8.0	21.8	25.7
Middle	19	32.8	20.0	411,767	36.3	20.9	21.7
Upper	28	48.3	27.5	619,893	54.7	39.5	33.9
Unknown	0	0.0	0.3	0	0.0	0.9	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>1,133,655</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	186	5.1	4.0	69,234	2.9	5.7	2.9
Moderate	644	17.5	14.2	264,744	11.3	13.3	13.5
Middle	1,384	37.7	36.1	799,874	34.0	28.6	36.7
Upper	1,456	39.7	45.8	1,217,690	51.8	52.1	46.8
Unknown	0	0.0	0.1	0	0.0	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3,670</b>	<b>100.0</b>	<b>100.0</b>	<b>2,351,542</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 35620 (NY-Newark-Jersey City, NY-NJ-PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	192	9.0	3.8	63,804	7.4	2.9	214	9.9	4.0	63,081	6.7	3.1	2.9
Moderate	508	23.8	14.4	182,982	21.3	11.5	432	20.0	14.8	167,474	17.7	12.0	13.5
Middle	887	41.5	36.4	341,071	39.6	31.9	870	40.3	35.4	378,115	40.0	30.6	36.7
Upper	549	25.7	45.4	272,420	31.7	53.6	643	29.8	45.7	336,073	35.5	54.2	46.8
Unknown	0	0.0	0.1	0	0.0	0.1	2	0.1	0.1	830	0.1	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2,136</b>	<b>100.0</b>	<b>100.0</b>	<b>860,277</b>	<b>100.0</b>	<b>100.0</b>	<b>2,161</b>	<b>100.0</b>	<b>100.0</b>	<b>945,573</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	71	3.4	2.6	24,793	2.8	2.4	87	4.1	3.3	31,596	3.6	3.0	2.9
Moderate	268	12.9	10.7	99,260	11.4	9.0	324	15.1	12.4	116,959	13.5	10.7	13.5
Middle	692	33.4	34.5	253,052	29.0	29.7	810	37.8	35.4	322,393	37.2	30.6	36.7
Upper	1,040	50.2	52.1	495,125	56.7	58.8	923	43.0	48.9	395,754	45.6	55.6	46.8
Unknown	1	0.0	0.1	293	0.0	0.1	1	0.0	0.1	680	0.1	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2,072</b>	<b>100.0</b>	<b>100.0</b>	<b>872,523</b>	<b>100.0</b>	<b>100.0</b>	<b>2,145</b>	<b>100.0</b>	<b>100.0</b>	<b>867,382</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	8	1.5	2.0	633	0.9	1.7	16	2.2	1.9	1,783	1.8	1.9	2.9
Moderate	59	10.7	9.3	4,760	6.7	8.3	79	10.9	9.4	8,806	9.1	8.5	13.5
Middle	172	31.3	33.7	18,842	26.6	29.7	221	30.6	35.2	24,586	25.3	30.9	36.7
Upper	311	56.5	54.9	46,501	65.7	60.2	407	56.3	53.5	61,850	63.7	58.7	46.8
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>550</b>	<b>100.0</b>	<b>100.0</b>	<b>70,736</b>	<b>100.0</b>	<b>100.0</b>	<b>723</b>	<b>100.0</b>	<b>100.0</b>	<b>97,025</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	4	11.4	17.7	28,285	6.2	13.1	7	17.1	18.4	4,570	1.0	16.9	
Moderate	17	48.6	32.9	130,511	28.5	25.9	8	19.5	32.7	15,190	3.2	29.0	25.7
Middle	6	17.1	19.2	54,125	11.8	20.1	12	29.3	21.3	199,312	42.5	24.0	21.7
Upper	8	22.9	29.8	245,208	53.5	40.4	14	34.1	27.4	250,354	53.3	30.0	33.9
Unknown	0	0.0	0.4	0	0.0	0.4	0	0.0	0.1	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>35</b>	<b>100.0</b>	<b>100.0</b>	<b>458,129</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>469,426</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	378	5.9	3.2	147,064	5.3	3.8	348	6.4	3.6	107,606	4.3	4.5	
Moderate	1,232	19.3	12.3	532,794	19.3	11.8	929	17.1	13.4	331,576	13.4	13.1	13.5
Middle	2,486	39.0	35.2	893,325	32.3	29.5	2,075	38.3	35.3	969,311	39.1	29.9	36.7
Upper	2,277	35.7	49.2	1,190,264	43.1	54.8	2,069	38.1	47.6	1,068,488	43.1	52.5	46.8
Unknown	3	0.0	0.1	939	0.0	0.1	3	0.1	0.1	1,510	0.1	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>6,376</b>	<b>100.0</b>	<b>100.0</b>	<b>2,764,386</b>	<b>100.0</b>	<b>100.0</b>	<b>5,424</b>	<b>100.0</b>	<b>100.0</b>	<b>2,478,491</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 35620 (NY-Newark-Jersey City, NY-NJ-PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Business %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	129	5.5	7.0	12,725	4.0	6.5	6.3
Moderate	363	15.6	16.1	51,532	16.2	15.1	15.5
Middle	732	31.5	28.8	107,022	33.5	28.8	29.8
Upper	1,086	46.7	46.2	144,416	45.3	46.8	47.2
Unknown	17	0.7	1.1	3,330	1.0	2.3	1.2
Tract-Unk	0	0.0	0.7	0	0.0	0.5	
<b>Total</b>	<b>2,327</b>	<b>100.0</b>	<b>100.0</b>	<b>319,025</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 35620 (NY-Newark-Jersey City, NY-NJ-PA)													
Geographic Income Level	Bank And Aggregate Loans By Year											Total Business %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Low	266	5.0	6.5	22,893	3.4	5.4	347	6.5	7.0	27,218	4.6	5.8	6.4
Moderate	698	13.2	15.7	82,233	12.3	13.7	751	14.1	17.1	79,695	13.4	14.6	15.7
Middle	1,465	27.7	29.3	203,154	30.3	28.4	1,445	27.1	30.0	171,592	28.9	28.7	29.9
Upper	2,785	52.7	47.2	350,029	52.2	50.0	2,719	51.1	44.5	307,721	51.7	48.6	46.8
Unknown	66	1.3	1.2	11,747	1.8	2.2	61	1.1	1.1	8,493	1.4	2.1	1.2
Tract-Unk	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>5,280</b>	<b>100.0</b>	<b>100.0</b>	<b>670,056</b>	<b>100.0</b>	<b>100.0</b>	<b>5,323</b>	<b>100.0</b>	<b>100.0</b>	<b>594,719</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 35620 (NY-Newark-Jersey City, NY-NJ-PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	44	2.9	3.7	6,379	1.1	1.7	24.8
<b>Moderate</b>	314	20.7	14.9	77,829	13.1	8.9	15.6
<b>Middle</b>	408	26.9	21.5	136,777	23.0	16.2	17.4
<b>Upper</b>	514	33.9	46.4	277,120	46.7	59.2	42.3
<b>Unknown</b>	234	15.5	13.5	95,566	16.1	13.9	0.0
<b>Total</b>	1,514	100.0	100.0	593,671	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	52	4.5	4.1	7,211	1.6	2.0	24.8
<b>Moderate</b>	118	10.3	10.7	23,131	5.1	5.9	15.6
<b>Middle</b>	215	18.8	19.5	58,566	13.0	13.5	17.4
<b>Upper</b>	693	60.6	50.1	329,552	73.0	61.5	42.3
<b>Unknown</b>	66	5.8	15.5	33,080	7.3	17.1	0.0
<b>Total</b>	1,144	100.0	100.0	451,540	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	31	5.3	4.1	1,492	2.3	2.2	24.8
<b>Moderate</b>	88	15.1	11.2	6,768	10.6	7.0	15.6
<b>Middle</b>	146	25.0	20.5	11,441	18.0	14.6	17.4
<b>Upper</b>	309	53.0	60.8	43,304	68.0	69.3	42.3
<b>Unknown</b>	9	1.5	3.5	636	1.0	6.8	0.0
<b>Total</b>	583	100.0	100.0	63,641	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	127	3.5	4.0	15,082	1.2	1.9	24.8
<b>Moderate</b>	520	14.4	12.6	107,728	8.8	7.4	15.6
<b>Middle</b>	769	21.3	20.1	206,784	17.0	14.7	17.4
<b>Upper</b>	1,516	42.0	48.3	649,976	53.4	59.9	42.3
<b>Unknown</b>	680	18.8	14.9	238,317	19.6	16.1	0.0
<b>Total</b>	3,612	100.0	100.0	1,217,887	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 35620 (NY-Newark-Jersey City, NY-NJ-PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	72	3.4	3.8	13,109	1.5	1.7	58	2.7	3.2	9,795	1.0	1.4	24.8
Moderate	396	18.5	15.5	114,631	13.3	9.6	370	17.1	14.5	113,644	12.0	8.7	15.6
Middle	465	21.8	21.5	167,661	19.5	16.8	549	25.4	21.6	226,978	24.0	16.4	17.4
Upper	642	30.1	45.8	363,544	42.3	58.4	779	36.0	46.8	488,459	51.7	59.7	42.3
Unknown	561	26.3	13.4	201,332	23.4	13.6	405	18.7	13.9	106,697	11.3	13.8	0.0
<b>Total</b>	<b>2,136</b>	<b>100.0</b>	<b>100.0</b>	<b>860,277</b>	<b>100.0</b>	<b>100.0</b>	<b>2,161</b>	<b>100.0</b>	<b>100.0</b>	<b>945,573</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	53	2.6	2.6	7,918	0.9	1.3	55	2.6	3.3	9,150	1.1	1.8	24.8
Moderate	211	10.2	10.4	53,155	6.1	6.5	300	14.0	12.5	80,000	9.2	7.9	15.6
Middle	439	21.2	20.2	141,409	16.2	15.6	548	25.5	21.5	183,460	21.2	16.8	17.4
Upper	1,178	56.9	52.8	565,113	64.8	61.5	1,132	52.8	49.7	547,238	63.1	59.5	42.3
Unknown	191	9.2	14.1	104,928	12.0	15.0	110	5.1	13.1	47,534	5.5	14.0	0.0
<b>Total</b>	<b>2,072</b>	<b>100.0</b>	<b>100.0</b>	<b>872,523</b>	<b>100.0</b>	<b>100.0</b>	<b>2,145</b>	<b>100.0</b>	<b>100.0</b>	<b>867,382</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	34	6.2	4.2	2,191	3.1	2.3	33	4.6	3.7	2,061	2.1	2.3	24.8
Moderate	71	12.9	10.5	6,038	8.5	6.5	82	11.3	11.0	6,935	7.1	7.0	15.6
Middle	103	18.7	20.0	9,751	13.8	14.1	164	22.7	20.6	15,811	16.3	15.3	17.4
Upper	323	58.7	62.1	49,902	70.5	69.8	424	58.6	62.1	70,460	72.6	70.6	42.3
Unknown	19	3.5	3.3	2,854	4.0	7.2	20	2.8	2.4	1,758	1.8	4.9	0.0
<b>Total</b>	<b>550</b>	<b>100.0</b>	<b>100.0</b>	<b>70,736</b>	<b>100.0</b>	<b>100.0</b>	<b>723</b>	<b>100.0</b>	<b>100.0</b>	<b>97,025</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	159	2.5	3.0	23,218	1.0	1.4	146	2.7	3.3	21,006	1.0	1.6	24.8
Moderate	678	10.7	11.8	173,824	7.5	7.5	752	14.0	13.1	200,579	10.0	8.1	15.6
Middle	1,007	15.9	20.1	318,821	13.8	15.6	1,261	23.4	21.3	426,249	21.2	16.3	17.4
Upper	2,143	33.8	49.6	978,559	42.4	59.5	2,335	43.4	48.9	1,106,157	55.1	59.7	42.3
Unknown	2,354	37.1	15.6	811,835	35.2	16.0	889	16.5	13.4	255,074	12.7	14.2	0.0
<b>Total</b>	<b>6,341</b>	<b>100.0</b>	<b>100.0</b>	<b>2,306,257</b>	<b>100.0</b>	<b>100.0</b>	<b>5,383</b>	<b>100.0</b>	<b>100.0</b>	<b>2,009,065</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 35620 (NY-Newark-Jersey City, NY-NJ-PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
\$1 Million or Less	1,336	57.4	44.2	108,625	34.0	27.8	90.4
Over \$1 Million	944	40.6		199,122	62.4		8.8
Revenue Unknown	47	2.0		11,278	3.5		0.8
<b>Total</b>	<b>2,327</b>	<b>100.0</b>		<b>319,025</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	1,762	75.7	95.3	66,387	20.8	45.9	
\$100,001 - \$250,000	202	8.7	2.6	38,248	12.0	15.2	
\$250,001 - \$1 Million	363	15.6	2.1	214,390	67.2	38.9	
<b>Total</b>	<b>2,327</b>	<b>100.0</b>	<b>100.0</b>	<b>319,025</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	1,172	87.7		34,625	31.9		
\$100,001 - \$250,000	53	4.0		9,757	9.0		
\$250,001 - \$1 Million	111	8.3		64,243	59.1		
<b>Total</b>	<b>1,336</b>	<b>100.0</b>		<b>108,625</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 35620 (NY-Newark-Jersey City, NY-NJ-PA)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
\$1 Million or Less	1,982	37.5	35.8	147,405	22.0	19.8	1,984	37.3	38.7	122,652	20.6	19.7	90.8
Over \$1 Million	1,747	33.1		374,277	55.9		1,476	27.7		329,569	55.4		8.3
Revenue Unknown	1,551	29.4		148,374	22.1		1,863	35.0		142,498	24.0		0.8
<b>Total</b>	<b>5,280</b>	<b>100.0</b>		<b>670,056</b>	<b>100.0</b>		<b>5,323</b>	<b>100.0</b>		<b>594,719</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	3,713	70.3	88.9	140,613	21.0	35.1	4,050	76.1	92.6	133,980	22.5	40.0	
\$100,001 - \$250,000	768	14.5	6.7	126,187	18.8	21.4	595	11.2	4.4	99,159	16.7	19.1	
\$250,001 - \$1 Million	799	15.1	4.4	403,256	60.2	43.6	678	12.7	3.0	361,580	60.8	40.9	
<b>Total</b>	<b>5,280</b>	<b>100.0</b>	<b>100.0</b>	<b>670,056</b>	<b>100.0</b>	<b>100.0</b>	<b>5,323</b>	<b>100.0</b>	<b>100.0</b>	<b>594,719</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	1,740	87.8		54,351	36.9		1,793	90.4		53,172	43.4		
\$100,001 - \$250,000	108	5.4		18,013	12.2		79	4.0		12,378	10.1		
\$250,001 - \$1 Million	134	6.8		75,041	50.9		112	5.6		57,102	46.6		
<b>Total</b>	<b>1,982</b>	<b>100.0</b>		<b>147,405</b>	<b>100.0</b>		<b>1,984</b>	<b>100.0</b>		<b>122,652</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 37980 (Phila-Camden-Wilm, PA-NJ-DE-MD)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	26	4.9	2.6	3,461	2.7	1.6	3.6
Moderate	165	30.9	19.2	29,704	23.6	14.2	18.1
Middle	180	33.7	42.6	41,095	32.7	38.9	42.1
Upper	163	30.5	35.6	51,595	41.0	45.2	36.2
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	
<b>Total</b>	<b>534</b>	<b>100.0</b>	<b>100.0</b>	<b>125,855</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	3	0.9	1.7	158	0.2	1.1	3.6
Moderate	40	11.5	14.2	4,835	5.7	10.1	18.1
Middle	139	39.9	41.8	22,388	26.5	37.4	42.1
Upper	166	47.7	42.2	56,959	67.5	51.5	36.2
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	
<b>Total</b>	<b>348</b>	<b>100.0</b>	<b>100.0</b>	<b>84,340</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	2	0.7	2.0	75	0.3	1.5	3.6
Moderate	31	11.2	14.5	1,740	7.9	11.0	18.1
Middle	109	39.5	40.5	6,578	29.8	34.5	42.1
Upper	134	48.6	43.0	13,666	62.0	53.0	36.2
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	
<b>Total</b>	<b>276</b>	<b>100.0</b>	<b>100.0</b>	<b>22,059</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	1	10.0	12.9	13,482	6.2	6.7	6.5
Moderate	4	40.0	38.0	95,986	44.0	23.5	24.5
Middle	4	40.0	25.4	100,500	46.1	29.0	36.3
Upper	1	10.0	23.4	8,180	3.7	40.1	32.0
Unknown	0	0.0	0.3	0	0.0	0.7	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>218,148</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	39	2.8	2.3	17,755	3.6	1.9	3.6
Moderate	318	22.6	17.2	141,819	29.1	13.6	18.1
Middle	541	38.5	42.1	188,080	38.6	37.5	42.1
Upper	509	36.2	38.4	139,557	28.6	47.0	36.2
Unknown	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1,407</b>	<b>100.0</b>	<b>100.0</b>	<b>487,211</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 37980 (Phila-Camden-Wilm, PA-NJ-DE-MD)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	36	5.0	2.6	4,331	2.4	1.6	20	4.2	3.0	3,116	2.3	1.9	3.6
Moderate	206	28.7	18.7	37,564	21.0	14.0	98	20.8	19.4	21,213	15.9	14.3	18.1
Middle	289	40.2	42.4	65,462	36.6	38.9	214	45.3	42.3	53,462	40.2	38.8	42.1
Upper	188	26.1	36.3	71,478	40.0	45.4	140	29.7	35.2	55,224	41.5	45.0	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>719</b>	<b>100.0</b>	<b>100.0</b>	<b>178,835</b>	<b>100.0</b>	<b>100.0</b>	<b>472</b>	<b>100.0</b>	<b>100.0</b>	<b>133,015</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	5	1.0	1.1	561	0.4	0.7	11	1.5	1.4	1,049	0.6	0.9	3.6
Moderate	66	12.9	11.6	11,412	8.4	8.6	136	18.4	13.5	21,606	12.8	9.7	18.1
Middle	189	36.9	41.4	38,173	28.0	37.2	292	39.6	42.7	56,003	33.1	38.2	42.1
Upper	252	49.2	46.0	86,306	63.3	53.5	299	40.5	42.3	90,710	53.6	51.1	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>512</b>	<b>100.0</b>	<b>100.0</b>	<b>136,452</b>	<b>100.0</b>	<b>100.0</b>	<b>738</b>	<b>100.0</b>	<b>100.0</b>	<b>169,368</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.1	0	0.0	1.5	7	2.3	2.2	345	1.3	1.5	3.6
Moderate	29	12.7	13.3	1,682	9.0	10.0	46	15.3	14.0	2,805	10.7	10.2	18.1
Middle	105	46.1	40.6	6,790	36.1	35.3	111	36.9	40.7	9,032	34.3	35.9	42.1
Upper	94	41.2	44.0	10,314	54.9	53.3	137	45.5	43.1	14,152	53.7	52.4	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>228</b>	<b>100.0</b>	<b>100.0</b>	<b>18,786</b>	<b>100.0</b>	<b>100.0</b>	<b>301</b>	<b>100.0</b>	<b>100.0</b>	<b>26,334</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	1	11.1	13.3	4,500	2.1	8.5	0	0.0	13.1	0	0.0	4.3	6.5
Moderate	2	22.2	32.7	13,655	6.2	24.9	1	20.0	36.8	950	0.5	30.8	24.5
Middle	3	33.3	29.3	32,133	14.7	37.2	2	40.0	27.2	121,557	62.6	33.2	36.3
Upper	3	33.3	24.6	168,465	77.0	29.2	2	40.0	22.8	71,600	36.9	31.0	32.0
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.3	0	0.0	0.7	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>218,753</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>194,107</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	62	3.1	1.8	11,961	1.9	1.5	46	2.7	2.1	5,083	0.9	1.5	3.6
Moderate	453	22.5	14.7	85,115	13.2	11.7	340	20.1	15.9	53,015	9.7	13.0	18.1
Middle	841	41.8	41.8	184,854	28.7	37.9	692	40.9	42.4	250,480	45.8	38.1	42.1
Upper	654	32.5	41.8	361,361	56.2	48.8	614	36.3	39.5	238,841	43.6	47.3	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2,010</b>	<b>100.0</b>	<b>100.0</b>	<b>643,291</b>	<b>100.0</b>	<b>100.0</b>	<b>1,692</b>	<b>100.0</b>	<b>100.0</b>	<b>547,419</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 37980 (Phila-Camden-Wilm, PA-NJ-DE-MD)							
Geographic Income Level	Bank And Aggregate Loans						Total Business %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	25	2.6	3.3	6,033	3.9	3.3	3.9
Moderate	174	18.0	17.1	33,532	21.5	17.9	17.4
Middle	425	44.0	39.1	64,506	41.3	40.0	39.4
Upper	341	35.3	39.2	51,674	33.1	37.5	38.8
Unknown	2	0.2	0.4	354	0.2	0.8	0.5
Tract-Unk	0	0.0	0.9	0	0.0	0.5	
<b>Total</b>	<b>967</b>	<b>100.0</b>	<b>100.0</b>	<b>156,099</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 37980 (Phila-Camden-Wilm, PA-NJ-DE-MD)													
Geographic Income Level	Bank And Aggregate Loans By Year											Total Business %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Low	75	2.8	3.3	14,954	4.2	3.3	51	2.6	3.6	6,989	2.9	3.5	4.0
Moderate	502	18.8	16.4	71,758	20.3	16.8	351	17.7	17.7	38,765	16.1	17.5	18.0
Middle	1,064	39.8	39.6	139,373	39.5	40.2	826	41.5	39.7	106,819	44.2	39.7	39.3
Upper	1,028	38.5	40.0	126,949	35.9	38.8	751	37.8	38.2	87,164	36.1	38.5	38.1
Unknown	3	0.1	0.4	254	0.1	0.7	9	0.5	0.4	1,687	0.7	0.7	0.5
Tract-Unk	0	0.0	0.4	0	0.0	0.2	0	0.0	0.4	0	0.0	0.1	
<b>Total</b>	<b>2,672</b>	<b>100.0</b>	<b>100.0</b>	<b>353,288</b>	<b>100.0</b>	<b>100.0</b>	<b>1,988</b>	<b>100.0</b>	<b>100.0</b>	<b>241,424</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 37980 (Phila-Camden-Wilm, PA-NJ-DE-MD)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	67	12.5	9.2	8,343	6.6	5.2	22.0
<b>Moderate</b>	139	26.0	21.7	25,193	20.0	16.5	17.3
<b>Middle</b>	135	25.3	22.5	30,141	23.9	21.4	20.0
<b>Upper</b>	139	26.0	32.5	47,880	38.0	43.5	40.8
<b>Unknown</b>	54	10.1	14.1	14,298	11.4	13.4	0.0
<b>Total</b>	534	100.0	100.0	125,855	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	32	9.2	7.0	3,223	3.8	3.8	22.0
<b>Moderate</b>	70	20.1	15.2	8,578	10.2	10.9	17.3
<b>Middle</b>	55	15.8	21.0	8,037	9.5	18.4	20.0
<b>Upper</b>	161	46.3	39.7	58,238	69.1	48.6	40.8
<b>Unknown</b>	30	8.6	17.1	6,264	7.4	18.3	0.0
<b>Total</b>	348	100.0	100.0	84,340	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	24	8.7	8.4	1,333	6.0	5.7	22.0
<b>Moderate</b>	68	24.6	17.0	4,050	18.4	13.1	17.3
<b>Middle</b>	64	23.2	23.5	3,957	17.9	19.5	20.0
<b>Upper</b>	110	39.9	48.2	12,028	54.5	55.0	40.8
<b>Unknown</b>	10	3.6	3.0	691	3.1	6.7	0.0
<b>Total</b>	276	100.0	100.0	22,059	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	123	8.8	8.2	12,899	4.8	4.6	22.0
<b>Moderate</b>	277	19.8	18.3	37,821	14.1	14.0	17.3
<b>Middle</b>	254	18.2	21.6	42,135	15.7	19.9	20.0
<b>Upper</b>	410	29.3	35.8	118,146	43.9	45.2	40.8
<b>Unknown</b>	333	23.8	16.1	58,062	21.6	16.3	0.0
<b>Total</b>	1,397	100.0	100.0	269,063	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 37980 (Phila-Camden-Wilm, PA-NJ-DE-MD)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	114	15.9	10.8	17,003	9.5	6.4	46	9.7	8.4	8,076	6.1	4.8	22.0
Moderate	204	28.4	24.5	39,698	22.2	19.3	126	26.7	21.2	30,409	22.9	16.1	17.3
Middle	138	19.2	22.2	35,737	20.0	21.8	91	19.3	20.9	23,899	18.0	19.7	20.0
Upper	143	19.9	30.9	59,004	33.0	41.0	126	26.7	31.1	47,757	35.9	41.5	40.8
Unknown	120	16.7	11.6	27,393	15.3	11.5	83	17.6	18.5	22,874	17.2	17.9	0.0
<b>Total</b>	<b>719</b>	<b>100.0</b>	<b>100.0</b>	<b>178,835</b>	<b>100.0</b>	<b>100.0</b>	<b>472</b>	<b>100.0</b>	<b>100.0</b>	<b>133,015</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	48	9.4	5.0	6,003	4.4	2.8	59	8.0	6.2	6,496	3.8	3.6	22.0
Moderate	92	18.0	15.1	14,263	10.5	11.4	164	22.2	16.2	26,011	15.4	12.2	17.3
Middle	99	19.3	22.9	18,984	13.9	20.8	178	24.1	21.8	34,046	20.1	19.4	20.0
Upper	212	41.4	40.7	81,449	59.7	48.8	276	37.4	38.0	86,621	51.1	46.5	40.8
Unknown	61	11.9	16.3	15,753	11.5	16.2	61	8.3	17.8	16,194	9.6	18.4	0.0
<b>Total</b>	<b>512</b>	<b>100.0</b>	<b>100.0</b>	<b>136,452</b>	<b>100.0</b>	<b>100.0</b>	<b>738</b>	<b>100.0</b>	<b>100.0</b>	<b>169,368</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	25	11.0	7.9	1,242	6.6	5.4	30	10.0	7.0	1,996	7.6	5.0	22.0
Moderate	47	20.6	17.3	2,934	15.6	13.2	63	20.9	16.1	4,213	16.0	12.6	17.3
Middle	56	24.6	24.5	3,919	20.9	20.6	68	22.6	23.5	5,374	20.4	19.5	20.0
Upper	89	39.0	47.3	9,731	51.8	54.8	126	41.9	50.9	13,128	49.9	58.4	40.8
Unknown	11	4.8	2.9	960	5.1	6.0	14	4.7	2.5	1,623	6.2	4.5	0.0
<b>Total</b>	<b>228</b>	<b>100.0</b>	<b>100.0</b>	<b>18,786</b>	<b>100.0</b>	<b>100.0</b>	<b>301</b>	<b>100.0</b>	<b>100.0</b>	<b>26,334</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	187	9.3	7.1	24,248	5.7	4.2	135	8.0	7.1	16,568	4.7	4.1	22.0
Moderate	343	17.1	18.0	56,895	13.4	14.2	353	20.9	17.9	60,633	17.2	13.8	17.3
Middle	293	14.6	22.0	58,640	13.8	20.7	337	20.0	21.3	63,319	17.9	19.4	20.0
Upper	444	22.2	36.4	150,184	35.4	45.1	528	31.3	36.0	147,506	41.7	44.5	40.8
Unknown	734	36.7	16.4	134,571	31.7	15.8	334	19.8	17.8	65,286	18.5	18.2	0.0
<b>Total</b>	<b>2,001</b>	<b>100.0</b>	<b>100.0</b>	<b>424,538</b>	<b>100.0</b>	<b>100.0</b>	<b>1,687</b>	<b>100.0</b>	<b>100.0</b>	<b>353,312</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 37980 (Phila-Camden-Wilm, PA-NJ-DE-MD)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	532	55.0	45.3	46,020	29.5	32.1	90.8
<b>Over \$1 Million</b>	400	41.4		101,536	65.0		8.4
<b>Revenue Unknown</b>	35	3.6		8,543	5.5		0.8
<b>Total</b>	967	100.0		156,099	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	647	66.9	93.4	21,312	13.7	37.8	
<b>\$100,001 - \$250,000</b>	123	12.7	3.3	22,883	14.7	15.4	
<b>\$250,001 - \$1 Million</b>	197	20.4	3.3	111,904	71.7	46.8	
<b>Total</b>	967	100.0	100.0	156,099	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	430	80.8		10,977	23.9		
<b>\$100,001 - \$250,000</b>	52	9.8		9,460	20.6		
<b>\$250,001 - \$1 Million</b>	50	9.4		25,583	55.6		
<b>Total</b>	532	100.0		46,020	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 37980 (Phila-Camden-Wilm, PA-NJ-DE-MD)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	#	#%
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	968	36.2	39.8	65,240	18.5	23.7	650	32.7	44.3	57,038	23.6	26.8	91.4
<b>Over \$1 Million</b>	817	30.6		211,571	59.9		482	24.2		122,169	50.6		7.8
<b>Revenue Unknown</b>	887	33.2		76,477	21.6		856	43.1		62,217	25.8		0.9
<b>Total</b>	2,672	100.0	100.0	353,288	100.0	100.0	1,988	100.0	100.0	241,424	100.0	100.0	100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	1,775	66.4	86.4	62,735	17.8	30.7	1,396	70.2	91.0	43,463	18.0	33.8	
<b>\$100,001 - \$250,000</b>	487	18.2	7.8	79,446	22.5	21.0	313	15.7	5.2	51,380	21.3	19.8	
<b>\$250,001 - \$1 Million</b>	410	15.3	5.8	211,107	59.8	48.4	279	14.0	3.9	146,581	60.7	46.4	
<b>Total</b>	2,672	100.0	100.0	353,288	100.0	100.0	1,988	100.0	100.0	241,424	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	834	86.2		24,868	38.1		526	80.9		15,589	27.3		
<b>\$100,001 - \$250,000</b>	76	7.9		12,145	18.6		67	10.3		10,890	19.1		
<b>\$250,001 - \$1 Million</b>	58	6.0		28,227	43.3		57	8.8		30,559	53.6		
<b>Total</b>	968	100.0		65,240	100.0		650	100.0		57,038	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 41540 (Salisbury, MD-DE)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	4.8	4.7	1,424	3.3	2.8	7.7
Middle	99	60.0	63.2	25,057	57.8	59.3	65.8
Upper	58	35.2	32.1	16,853	38.9	37.9	26.5
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	
<b>Total</b>	<b>165</b>	<b>100.0</b>	<b>100.0</b>	<b>43,334</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	1.6	3.9	412	0.9	2.3	7.7
Middle	136	70.5	61.2	24,014	50.5	55.5	65.8
Upper	54	28.0	34.9	23,126	48.6	42.1	26.5
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	
<b>Total</b>	<b>193</b>	<b>100.0</b>	<b>100.0</b>	<b>47,552</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	4.0	3.6	388	3.5	2.8	7.7
Middle	91	72.2	65.5	7,806	69.6	61.3	65.8
Upper	30	23.8	31.0	3,020	26.9	35.9	26.5
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	
<b>Total</b>	<b>126</b>	<b>100.0</b>	<b>100.0</b>	<b>11,214</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	60.0	31.4	27,395	65.2	22.5	11.0
Middle	2	40.0	48.6	14,605	34.8	56.3	46.1
Upper	0	0.0	20.0	0	0.0	21.2	42.9
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	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>42,000</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	21	4.2	4.5	29,878	20.4	3.3	7.7
Middle	334	66.7	62.5	72,516	49.6	57.9	65.8
Upper	146	29.1	33.0	43,769	29.9	38.8	26.5
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	
<b>Total</b>	<b>501</b>	<b>100.0</b>	<b>100.0</b>	<b>146,163</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 41540 (Salisbury, MD-DE)													
Geographic Income Level	Bank And Aggregate Loans By Year												
	2020						2021						Owner Occupied Units %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	13	6.9	4.5	2,358	4.0	2.7	11	9.2	5.8	2,210	6.2	3.6	7.7
Middle	116	61.7	60.8	31,968	54.3	55.1	78	65.0	61.3	21,782	60.6	56.3	65.8
Upper	59	31.4	34.7	24,528	41.7	42.2	31	25.8	32.9	11,930	33.2	40.2	26.5
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	
<b>Total</b>	<b>188</b>	<b>100.0</b>	<b>100.0</b>	<b>58,854</b>	<b>100.0</b>	<b>100.0</b>	<b>120</b>	<b>100.0</b>	<b>100.0</b>	<b>35,922</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	3.1	2.9	1,149	1.8	1.9	17	6.6	3.4	3,867	6.4	2.3	7.7
Middle	162	63.3	59.3	31,789	49.6	55.5	165	64.5	60.5	34,262	56.9	56.0	65.8
Upper	86	33.6	37.8	31,113	48.6	42.7	74	28.9	36.0	22,055	36.6	41.7	26.5
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	
<b>Total</b>	<b>256</b>	<b>100.0</b>	<b>100.0</b>	<b>64,051</b>	<b>100.0</b>	<b>100.0</b>	<b>256</b>	<b>100.0</b>	<b>100.0</b>	<b>60,184</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	11	6.3	5.5	715	5.3	3.4	5	2.9	3.6	208	1.4	1.9	7.7
Middle	133	76.0	67.1	10,087	75.2	62.9	120	69.0	63.6	10,015	66.9	58.1	65.8
Upper	31	17.7	27.4	2,617	19.5	33.7	49	28.2	32.8	4,744	31.7	40.0	26.5
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	
<b>Total</b>	<b>175</b>	<b>100.0</b>	<b>100.0</b>	<b>13,419</b>	<b>100.0</b>	<b>100.0</b>	<b>174</b>	<b>100.0</b>	<b>100.0</b>	<b>14,967</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0		0.0
Moderate	0	0.0	10.8	0	0.0	6.5	2	40.0	25.0	953	5.0	19.7	11.0
Middle	3	60.0	70.3	18,014	28.1	55.1	3	60.0	65.6	18,085	95.0	56.2	46.1
Upper	2	40.0	18.9	46,050	71.9	38.4	0	0.0	9.4	0	0.0	24.1	42.9
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	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>64,064</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>19,038</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0		0.0
Moderate	33	5.1	3.8	4,391	2.2	2.4	36	6.4	4.6	7,319	5.6	3.2	7.7
Middle	428	66.8	60.2	94,400	46.4	55.2	371	66.1	60.9	84,926	64.8	56.1	65.8
Upper	180	28.1	35.9	104,596	51.4	42.3	154	27.5	34.4	38,729	29.6	40.8	26.5
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	
<b>Total</b>	<b>641</b>	<b>100.0</b>	<b>100.0</b>	<b>203,387</b>	<b>100.0</b>	<b>100.0</b>	<b>561</b>	<b>100.0</b>	<b>100.0</b>	<b>130,974</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 41540 (Salisbury, MD-DE)							
Geographic Income Level	Bank And Aggregate Loans						Total Business %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	30	7.0	8.9	3,179	9.2	9.3	10.3
Middle	319	74.2	61.7	26,735	77.1	64.9	63.1
Upper	81	18.8	27.9	4,747	13.7	25.2	26.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.4	0	0.0	0.6	
<b>Total</b>	<b>430</b>	<b>100.0</b>	<b>100.0</b>	<b>34,661</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 41540 (Salisbury, MD-DE)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Business %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	93	9.7	9.3	7,630	8.8	10.8	58	8.1	8.0	6,578	9.9	8.9	10.0
Middle	622	65.0	61.3	61,571	71.2	64.0	478	66.5	62.8	38,690	58.2	60.6	64.1
Upper	242	25.3	29.0	17,243	19.9	25.0	183	25.5	28.6	21,225	31.9	30.4	25.9
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	0.4	0	0.0	0.3	0	0.0	0.6	0	0.0	0.1	
<b>Total</b>	<b>957</b>	<b>100.0</b>	<b>100.0</b>	<b>86,444</b>	<b>100.0</b>	<b>100.0</b>	<b>719</b>	<b>100.0</b>	<b>100.0</b>	<b>66,493</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 41540 (Salisbury, MD-DE)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	7	4.2	4.1	982	2.3	2.0	20.3
<b>Moderate</b>	21	12.7	14.0	3,352	7.7	9.3	17.8
<b>Middle</b>	34	20.6	16.9	6,394	14.8	13.8	20.8
<b>Upper</b>	88	53.3	50.9	29,426	67.9	62.4	41.0
<b>Unknown</b>	15	9.1	14.0	3,180	7.3	12.4	0.0
<b>Total</b>	165	100.0	100.0	43,334	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	11	5.7	5.3	1,050	2.2	2.3	20.3
<b>Moderate</b>	36	18.7	11.5	4,549	9.6	6.9	17.8
<b>Middle</b>	29	15.0	16.6	4,373	9.2	12.4	20.8
<b>Upper</b>	108	56.0	48.7	35,523	74.7	60.3	41.0
<b>Unknown</b>	9	4.7	18.0	2,057	4.3	18.2	0.0
<b>Total</b>	193	100.0	100.0	47,552	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	16	12.7	7.6	777	6.9	4.4	20.3
<b>Moderate</b>	15	11.9	16.2	892	8.0	12.8	17.8
<b>Middle</b>	27	21.4	21.9	2,228	19.9	17.7	20.8
<b>Upper</b>	63	50.0	51.7	6,917	61.7	61.9	41.0
<b>Unknown</b>	5	4.0	2.6	400	3.6	3.3	0.0
<b>Total</b>	126	100.0	100.0	11,214	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	34	6.9	4.6	2,809	2.7	2.2	20.3
<b>Moderate</b>	72	14.5	13.2	8,793	8.4	8.5	17.8
<b>Middle</b>	90	18.1	17.1	12,995	12.5	13.3	20.8
<b>Upper</b>	259	52.2	49.6	71,866	69.0	61.2	41.0
<b>Unknown</b>	41	8.3	15.4	7,700	7.4	14.8	0.0
<b>Total</b>	496	100.0	100.0	104,163	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 41540 (Salisbury, MD-DE)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	11	5.9	4.7	1,531	2.6	2.4	8	6.7	4.0	1,108	3.1	1.9	20.3
Moderate	30	16.0	13.7	5,567	9.5	9.2	16	13.3	12.4	2,515	7.0	8.0	17.8
Middle	34	18.1	15.9	7,336	12.5	12.9	16	13.3	14.7	3,527	9.8	11.6	20.8
Upper	98	52.1	55.3	40,507	68.8	66.0	63	52.5	51.9	23,796	66.2	61.8	41.0
Unknown	15	8.0	10.4	3,913	6.6	9.6	17	14.2	17.0	4,976	13.9	16.7	0.0
<b>Total</b>	<b>188</b>	<b>100.0</b>	<b>100.0</b>	<b>58,854</b>	<b>100.0</b>	<b>100.0</b>	<b>120</b>	<b>100.0</b>	<b>100.0</b>	<b>35,922</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	18	7.0	2.8	1,678	2.6	1.5	19	7.4	3.9	1,690	2.8	2.0	20.3
Moderate	44	17.2	10.7	5,589	8.7	7.3	51	19.9	12.1	7,448	12.4	8.0	17.8
Middle	52	20.3	16.6	8,820	13.8	13.4	60	23.4	18.9	10,580	17.6	15.5	20.8
Upper	128	50.0	52.5	44,796	69.9	60.9	118	46.1	48.0	38,034	63.2	56.7	41.0
Unknown	14	5.5	17.4	3,168	4.9	17.0	8	3.1	17.0	2,432	4.0	17.7	0.0
<b>Total</b>	<b>256</b>	<b>100.0</b>	<b>100.0</b>	<b>64,051</b>	<b>100.0</b>	<b>100.0</b>	<b>256</b>	<b>100.0</b>	<b>100.0</b>	<b>60,184</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	16	9.1	5.9	697	5.2	3.5	13	7.5	5.6	683	4.6	3.5	20.3
Moderate	34	19.4	15.8	2,466	18.4	11.6	37	21.3	14.4	2,778	18.6	9.9	17.8
Middle	42	24.0	24.9	3,192	23.8	20.5	31	17.8	19.6	2,312	15.4	12.4	20.8
Upper	80	45.7	51.3	6,759	50.4	62.2	83	47.7	56.9	8,659	57.9	71.3	41.0
Unknown	3	1.7	2.1	305	2.3	2.3	10	5.7	3.5	535	3.6	2.9	0.0
<b>Total</b>	<b>175</b>	<b>100.0</b>	<b>100.0</b>	<b>13,419</b>	<b>100.0</b>	<b>100.0</b>	<b>174</b>	<b>100.0</b>	<b>100.0</b>	<b>14,967</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	45	7.1	3.8	3,906	2.8	2.0	40	7.2	4.0	3,481	3.1	2.0	20.3
Moderate	108	17.0	12.1	13,622	9.8	8.1	104	18.7	12.3	12,741	11.4	8.0	17.8
Middle	128	20.1	16.3	19,348	13.9	13.1	107	19.2	16.9	16,419	14.7	13.3	20.8
Upper	306	48.1	52.9	92,062	66.1	62.9	264	47.5	50.0	70,489	63.0	59.6	41.0
Unknown	49	7.7	14.9	10,385	7.5	13.9	41	7.4	16.8	8,806	7.9	17.1	0.0
<b>Total</b>	<b>636</b>	<b>100.0</b>	<b>100.0</b>	<b>139,323</b>	<b>100.0</b>	<b>100.0</b>	<b>556</b>	<b>100.0</b>	<b>100.0</b>	<b>111,936</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 41540 (Salisbury, MD-DE)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	313	72.8	46.1	15,525	44.8	42.9	92.5
<b>Over \$1 Million</b>	106	24.7		16,021	46.2		6.6
<b>Revenue Unknown</b>	11	2.6		3,115	9.0		1.0
<b>Total</b>	430	100.0		34,661	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	360	83.7	93.9	9,561	27.6	38.3	
<b>\$100,001 - \$250,000</b>	30	7.0	3.0	5,070	14.6	14.4	
<b>\$250,001 - \$1 Million</b>	40	9.3	3.1	20,030	57.8	47.3	
<b>Total</b>	430	100.0	100.0	34,661	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	286	91.4		6,352	40.9		
<b>\$100,001 - \$250,000</b>	14	4.5		2,375	15.3		
<b>\$250,001 - \$1 Million</b>	13	4.2		6,798	43.8		
<b>Total</b>	313	100.0		15,525	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 41540 (Salisbury, MD-DE)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	457	47.8	34.7	21,488	24.9	26.4	296	41.2	44.3	18,629	28.0	29.6	92.9
<b>Over \$1 Million</b>	225	23.5		47,104	54.5		126	17.5		29,969	45.1		6.1
<b>Revenue Unknown</b>	275	28.7		17,852	20.7		297	41.3		17,895	26.9		1.0
<b>Total</b>	957	100.0		86,444	100.0		719	100.0		66,493	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	741	77.4	87.4	21,545	24.9	32.0	579	80.5	92.1	15,075	22.7	37.5	
<b>\$100,001 - \$250,000</b>	128	13.4	7.5	20,798	24.1	22.3	60	8.3	4.5	10,003	15.0	18.9	
<b>\$250,001 - \$1 Million</b>	88	9.2	5.1	44,101	51.0	45.7	80	11.1	3.4	41,415	62.3	43.5	
<b>Total</b>	957	100.0	100.0	86,444	100.0	100.0	719	100.0	100.0	66,493	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	419	91.7		10,308	48.0		266	89.9		6,629	35.6		
<b>\$100,001 - \$250,000</b>	24	5.3		3,657	17.0		13	4.4		2,246	12.1		
<b>\$250,001 - \$1 Million</b>	14	3.1		7,523	35.0		17	5.7		9,754	52.4		
<b>Total</b>	457	100.0		21,488	100.0		296	100.0		18,629	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 47900 (Wash-Arling-Alex, DC-VA-MD-WV)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	15	2.9	4.6	4,534	2.1	3.6	3.8
Moderate	84	16.4	17.7	25,370	11.7	12.9	17.0
Middle	229	44.8	39.2	83,869	38.8	34.2	37.7
Upper	182	35.6	38.3	101,881	47.1	49.0	41.4
Unknown	1	0.2	0.2	516	0.2	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>511</b>	<b>100.0</b>	<b>100.0</b>	<b>216,170</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	21	3.4	4.0	5,493	2.5	3.0	3.8
Moderate	104	17.1	14.6	23,455	10.8	10.5	17.0
Middle	242	39.7	36.6	67,297	31.1	31.6	37.7
Upper	241	39.6	44.7	119,336	55.1	54.7	41.4
Unknown	1	0.2	0.2	1,010	0.5	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>609</b>	<b>100.0</b>	<b>100.0</b>	<b>216,591</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	10	3.4	3.2	940	3.2	3.2	3.8
Moderate	45	15.4	12.0	2,855	9.7	8.7	17.0
Middle	119	40.8	33.9	8,693	29.6	27.2	37.7
Upper	118	40.4	50.7	16,839	57.4	60.7	41.4
Unknown	0	0.0	0.1	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>292</b>	<b>100.0</b>	<b>100.0</b>	<b>29,327</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	2	25.0	25.1	13,800	16.0	11.7	17.7
Moderate	0	0.0	26.8	0	0.0	31.4	26.0
Middle	4	50.0	23.2	56,190	65.1	31.2	30.5
Upper	2	25.0	23.0	16,300	18.9	25.2	24.7
Unknown	0	0.0	1.9	0	0.0	0.4	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>86,290</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	61	3.9	4.3	27,293	4.7	3.9	3.8
Moderate	264	17.0	16.1	57,038	9.8	13.2	17.0
Middle	657	42.4	37.8	232,315	40.1	32.8	37.7
Upper	565	36.5	41.7	261,299	45.1	49.9	41.4
Unknown	2	0.1	0.2	1,526	0.3	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1,549</b>	<b>100.0</b>	<b>100.0</b>	<b>579,471</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 47900 (Wash-Arling-Alex, DC-VA-MD-WV)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	27	4.0	4.6	8,804	3.0	3.7	19	4.0	4.6	6,711	3.4	3.6	3.8
Moderate	144	21.3	18.0	45,503	15.5	13.4	100	21.3	17.9	32,203	16.1	13.0	17.0
Middle	321	47.5	39.6	127,165	43.5	34.8	244	51.9	39.6	97,698	49.0	34.6	37.7
Upper	184	27.2	37.6	111,163	38.0	47.8	107	22.8	37.7	62,897	31.5	48.6	41.4
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>676</b>	<b>100.0</b>	<b>100.0</b>	<b>292,635</b>	<b>100.0</b>	<b>100.0</b>	<b>470</b>	<b>100.0</b>	<b>100.0</b>	<b>199,509</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	30	3.0	2.9	7,641	1.7	2.4	51	5.9	3.4	12,628	4.0	2.7	3.8
Moderate	143	14.3	12.3	35,285	8.1	9.2	145	16.7	14.3	35,008	11.2	10.4	17.0
Middle	320	31.9	35.2	104,372	23.9	30.7	373	43.1	36.6	116,467	37.3	31.5	37.7
Upper	508	50.6	49.4	288,778	66.0	57.5	295	34.1	45.4	147,700	47.3	55.2	41.4
Unknown	2	0.2	0.2	1,344	0.3	0.2	2	0.2	0.2	697	0.2	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1,003</b>	<b>100.0</b>	<b>100.0</b>	<b>437,420</b>	<b>100.0</b>	<b>100.0</b>	<b>866</b>	<b>100.0</b>	<b>100.0</b>	<b>312,500</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	9	3.0	2.6	814	2.3	2.6	5	1.3	2.5	486	1.1	2.3	3.8
Moderate	34	11.1	11.1	2,890	8.0	8.2	52	13.5	10.0	5,102	11.0	7.7	17.0
Middle	113	37.0	30.3	11,719	32.4	24.1	159	41.3	30.5	15,339	33.2	24.9	37.7
Upper	149	48.9	55.8	20,744	57.4	64.9	168	43.6	56.8	25,258	54.6	64.8	41.4
Unknown	0	0.0	0.1	0	0.0	0.2	1	0.3	0.2	85	0.2	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>305</b>	<b>100.0</b>	<b>100.0</b>	<b>36,167</b>	<b>100.0</b>	<b>100.0</b>	<b>385</b>	<b>100.0</b>	<b>100.0</b>	<b>46,270</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	1	8.3	28.8	462	0.2	29.7	0	0.0	28.1	0	0.0	9.8	17.7
Moderate	1	8.3	22.9	19,500	9.8	22.6	3	25.0	20.4	87,297	22.2	20.3	26.0
Middle	8	66.7	25.4	108,373	54.6	33.5	5	41.7	26.6	181,398	46.2	42.8	30.5
Upper	2	16.7	20.9	70,295	35.4	13.8	4	33.3	22.2	123,919	31.6	24.7	24.7
Unknown	0	0.0	2.0	0	0.0	0.4	0	0.0	2.7	0	0.0	2.4	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>198,630</b>	<b>100.0</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>392,614</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	101	4.1	3.5	26,098	2.4	3.7	84	4.5	3.8	21,653	2.2	3.2	3.8
Moderate	455	18.5	14.1	132,330	12.1	11.0	332	17.9	15.5	166,454	17.0	11.7	17.0
Middle	972	39.6	36.4	407,841	37.4	32.1	837	45.2	37.4	424,737	43.3	33.0	37.7
Upper	926	37.7	45.8	521,668	47.9	53.0	596	32.2	43.1	366,700	37.4	51.8	41.4
Unknown	2	0.1	0.2	1,344	0.1	0.2	3	0.2	0.2	782	0.1	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2,456</b>	<b>100.0</b>	<b>100.0</b>	<b>1,089,281</b>	<b>100.0</b>	<b>100.0</b>	<b>1,852</b>	<b>100.0</b>	<b>100.0</b>	<b>980,326</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 47900 (Wash-Arling-Alex, DC-VA-MD-WV)							
Geographic Income Level	Bank And Aggregate Loans						Total Business %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	98	5.5	4.5	13,173	6.6	4.4	5.1
Moderate	388	21.9	18.3	42,800	21.4	18.1	18.4
Middle	684	38.6	34.0	78,786	39.4	34.7	34.4
Upper	600	33.9	42.2	64,719	32.4	41.9	41.5
Unknown	2	0.1	0.4	260	0.1	0.5	0.6
Tract-Unk	0	0.0	0.6	0	0.0	0.4	
<b>Total</b>	<b>1,772</b>	<b>100.0</b>	<b>100.0</b>	<b>199,738</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 47900 (Wash-Arling-Alex, DC-VA-MD-WV)													
Geographic Income Level	Bank And Aggregate Loans By Year												
	2020						2021						Total Business %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	259	5.6	4.7	27,915	5.5	4.7	242	6.0	5.1	24,765	6.3	5.0	
Moderate	898	19.5	18.4	97,682	19.4	19.0	807	20.0	18.9	81,234	20.6	19.4	18.6
Middle	1,786	38.8	34.7	195,375	38.8	35.6	1,592	39.4	35.5	156,720	39.8	35.5	34.4
Upper	1,643	35.7	41.6	181,623	36.1	40.1	1,390	34.4	40.0	129,506	32.9	39.7	41.0
Unknown	12	0.3	0.4	1,167	0.2	0.4	9	0.2	0.3	1,730	0.4	0.4	0.6
Tract-Unk	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>4,598</b>	<b>100.0</b>	<b>100.0</b>	<b>503,762</b>	<b>100.0</b>	<b>100.0</b>	<b>4,040</b>	<b>100.0</b>	<b>100.0</b>	<b>393,955</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 47900 (Wash-Arling-Alex, DC-VA-MD-WV)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	53	10.4	7.6	11,539	5.3	3.9	21.9
<b>Moderate</b>	118	23.1	21.3	35,283	16.3	15.3	16.6
<b>Middle</b>	148	29.0	22.8	57,104	26.4	21.1	20.1
<b>Upper</b>	168	32.9	33.0	101,635	47.0	45.4	41.5
<b>Unknown</b>	24	4.7	15.3	10,609	4.9	14.2	0.0
<b>Total</b>	511	100.0	100.0	216,170	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	73	12.0	6.3	11,985	5.5	3.3	21.9
<b>Moderate</b>	124	20.4	14.6	26,750	12.4	10.0	16.6
<b>Middle</b>	128	21.0	20.4	37,558	17.3	17.7	20.1
<b>Upper</b>	247	40.6	35.3	127,392	58.8	44.6	41.5
<b>Unknown</b>	37	6.1	23.3	12,906	6.0	24.5	0.0
<b>Total</b>	609	100.0	100.0	216,591	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	37	12.7	6.1	2,296	7.8	3.7	21.9
<b>Moderate</b>	77	26.4	15.3	5,904	20.1	10.5	16.6
<b>Middle</b>	68	23.3	23.7	6,049	20.6	18.7	20.1
<b>Upper</b>	105	36.0	52.6	14,448	49.3	61.0	41.5
<b>Unknown</b>	5	1.7	2.3	630	2.1	6.1	0.0
<b>Total</b>	292	100.0	100.0	29,327	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	163	10.6	6.9	25,820	5.2	3.6	21.9
<b>Moderate</b>	319	20.7	17.7	67,937	13.8	12.7	16.6
<b>Middle</b>	344	22.3	21.6	100,711	20.4	19.4	20.1
<b>Upper</b>	520	33.7	34.7	243,475	49.4	44.9	41.5
<b>Unknown</b>	195	12.7	19.1	55,238	11.2	19.4	0.0
<b>Total</b>	1,541	100.0	100.0	493,181	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 47900 (Wash-Arling-Alex, DC-VA-MD-WV)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	87	12.9	8.0	20,586	7.0	4.3	65	13.8	7.6	14,661	7.3	3.9	21.9
Moderate	149	22.0	22.2	49,324	16.9	16.2	133	28.3	20.8	42,022	21.1	14.9	16.6
Middle	151	22.3	22.9	66,482	22.7	21.6	87	18.5	21.4	37,161	18.6	19.8	20.1
Upper	202	29.9	32.4	126,547	43.2	43.9	142	30.2	31.0	90,537	45.4	42.7	41.5
Unknown	87	12.9	14.5	29,696	10.1	13.9	43	9.1	19.3	15,128	7.6	18.7	0.0
<b>Total</b>	<b>676</b>	<b>100.0</b>	<b>100.0</b>	<b>292,635</b>	<b>100.0</b>	<b>100.0</b>	<b>470</b>	<b>100.0</b>	<b>100.0</b>	<b>199,509</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	75	7.5	4.5	13,041	3.0	2.4	93	10.7	6.7	16,886	5.4	3.7	21.9
Moderate	152	15.2	13.2	36,409	8.3	9.4	207	23.9	15.4	52,284	16.7	11.1	16.6
Middle	195	19.4	21.6	64,325	14.7	19.1	210	24.2	20.7	63,718	20.4	18.3	20.1
Upper	482	48.1	37.4	285,256	65.2	44.4	300	34.6	33.3	159,790	51.1	41.8	41.5
Unknown	99	9.9	23.3	38,389	8.8	24.7	56	6.5	23.9	19,822	6.3	25.2	0.0
<b>Total</b>	<b>1,003</b>	<b>100.0</b>	<b>100.0</b>	<b>437,420</b>	<b>100.0</b>	<b>100.0</b>	<b>866</b>	<b>100.0</b>	<b>100.0</b>	<b>312,500</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	31	10.2	5.0	2,660	7.4	3.3	34	8.8	4.3	2,492	5.4	2.8	21.9
Moderate	49	16.1	11.6	4,795	13.3	8.4	77	20.0	11.8	6,530	14.1	8.4	16.6
Middle	75	24.6	22.5	8,260	22.8	18.0	93	24.2	22.9	8,531	18.4	18.4	20.1
Upper	140	45.9	58.4	19,525	54.0	66.1	173	44.9	58.3	27,563	59.6	66.3	41.5
Unknown	10	3.3	2.5	927	2.6	4.2	8	2.1	2.7	1,154	2.5	4.1	0.0
<b>Total</b>	<b>305</b>	<b>100.0</b>	<b>100.0</b>	<b>36,167</b>	<b>100.0</b>	<b>100.0</b>	<b>385</b>	<b>100.0</b>	<b>100.0</b>	<b>46,270</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	193	7.9	5.4	36,287	4.1	3.0	192	10.4	6.9	34,039	5.8	3.8	21.9
Moderate	350	14.3	15.5	90,528	10.2	11.4	417	22.7	17.0	100,836	17.2	12.5	16.6
Middle	421	17.2	21.5	139,067	15.6	19.6	390	21.2	20.9	109,410	18.6	18.8	20.1
Upper	824	33.7	35.8	431,328	48.4	43.9	615	33.4	33.3	277,890	47.3	42.4	41.5
Unknown	656	26.8	21.8	193,441	21.7	22.1	226	12.3	22.0	65,537	11.2	22.6	0.0
<b>Total</b>	<b>2,444</b>	<b>100.0</b>	<b>100.0</b>	<b>890,651</b>	<b>100.0</b>	<b>100.0</b>	<b>1,840</b>	<b>100.0</b>	<b>100.0</b>	<b>587,712</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 47900 (Wash-Arling-Alex, DC-VA-MD-WV)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	1,068	60.3	49.6	66,932	33.5	32.7	91.2
Over \$1 Million	653	36.9		118,714	59.4		8.0
Revenue Unknown	51	2.9		14,092	7.1		0.8
<b>Total</b>	<b>1,772</b>	<b>100.0</b>		<b>199,738</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	1,382	78.0	95.2	43,324	21.7	43.8	
\$100,001 - \$250,000	159	9.0	2.4	29,404	14.7	13.3	
\$250,001 - \$1 Million	231	13.0	2.4	127,010	63.6	42.9	
<b>Total</b>	<b>1,772</b>	<b>100.0</b>	<b>100.0</b>	<b>199,738</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	941	88.1		24,378	36.4		
\$100,001 - \$250,000	60	5.6		10,502	15.7		
\$250,001 - \$1 Million	67	6.3		32,052	47.9		
<b>Total</b>	<b>1,068</b>	<b>100.0</b>		<b>66,932</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 47900 (Wash-Arling-Alex, DC-VA-MD-WV)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	1,918	41.7	43.8	114,927	22.8	25.6	1,452	35.9	47.8	96,277	24.4	28.6	91.7
Over \$1 Million	1,208	26.3		258,315	51.3		860	21.3		192,515	48.9		7.4
Revenue Unknown	1,472	32.0		130,520	25.9		1,728	42.8		105,163	26.7		0.8
<b>Total</b>	<b>4,598</b>	<b>100.0</b>		<b>503,762</b>	<b>100.0</b>		<b>4,040</b>	<b>100.0</b>		<b>393,955</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	3,340	72.6	87.6	117,425	23.3	31.5	3,078	76.2	92.6	95,561	24.3	37.7	
\$100,001 - \$250,000	705	15.3	7.0	115,550	22.9	20.1	524	13.0	4.1	87,563	22.2	17.9	
\$250,001 - \$1 Million	553	12.0	5.4	270,787	53.8	48.4	438	10.8	3.3	210,831	53.5	44.4	
<b>Total</b>	<b>4,598</b>	<b>100.0</b>	<b>100.0</b>	<b>503,762</b>	<b>100.0</b>	<b>100.0</b>	<b>4,040</b>	<b>100.0</b>	<b>100.0</b>	<b>393,955</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	1,728	90.1		52,880	46.0		1,258	86.6		38,360	39.8		
\$100,001 - \$250,000	100	5.2		16,313	14.2		109	7.5		18,365	19.1		
\$250,001 - \$1 Million	90	4.7		45,734	39.8		85	5.9		39,552	41.1		
<b>Total</b>	<b>1,918</b>	<b>100.0</b>		<b>114,927</b>	<b>100.0</b>		<b>1,452</b>	<b>100.0</b>		<b>96,277</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	7	3.2	3.2	705	1.8	1.7	3.0
Moderate	61	27.9	14.9	5,673	14.6	10.1	12.6
Middle	91	41.6	54.5	16,768	43.3	54.7	55.3
Upper	60	27.4	27.4	15,603	40.3	33.4	29.1
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	
<b>Total</b>	<b>219</b>	<b>100.0</b>	<b>100.0</b>	<b>38,749</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	1.8	2.0	90	0.4	1.2	3.0
Moderate	7	6.2	8.9	692	3.3	6.3	12.6
Middle	66	58.4	55.7	11,782	56.5	53.4	55.3
Upper	38	33.6	33.4	8,277	39.7	39.2	29.1
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	
<b>Total</b>	<b>113</b>	<b>100.0</b>	<b>100.0</b>	<b>20,841</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	2	5.6	2.0	26	1.1	1.9	3.0
Moderate	2	5.6	8.9	80	3.4	7.6	12.6
Middle	23	63.9	54.8	1,392	59.1	55.0	55.3
Upper	9	25.0	34.3	858	36.4	35.4	29.1
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	
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>2,356</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	3	21.4	14.3	1,315	1.5	3.0	14.4
Moderate	1	7.1	26.4	17,318	20.1	12.1	19.4
Middle	5	35.7	39.6	17,031	19.8	54.7	42.2
Upper	3	21.4	18.1	8,020	9.3	25.5	23.7
Unknown	2	14.3	1.6	42,448	49.3	4.7	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>86,132</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	17	4.0	2.8	2,383	1.5	1.8	3.0
Moderate	76	17.7	12.6	24,083	15.5	9.5	12.6
Middle	219	50.9	54.8	52,165	33.6	54.4	55.3
Upper	116	27.0	29.9	34,153	22.0	33.5	29.1
Unknown	2	0.5	0.0	42,448	27.3	0.8	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>430</b>	<b>100.0</b>	<b>100.0</b>	<b>155,232</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	23	11.7	3.2	1,488	4.4	1.8	27	9.5	4.1	2,325	4.1	2.6	3.0
Moderate	42	21.3	13.7	3,718	11.0	9.5	50	17.5	16.1	6,098	10.8	11.2	12.6
Middle	97	49.2	55.8	19,857	58.8	55.9	142	49.8	53.8	28,893	51.3	54.3	55.3
Upper	35	17.8	27.2	8,718	25.8	32.8	66	23.2	25.9	19,033	33.8	31.8	29.1
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	
<b>Total</b>	<b>197</b>	<b>100.0</b>	<b>100.0</b>	<b>33,781</b>	<b>100.0</b>	<b>100.0</b>	<b>285</b>	<b>100.0</b>	<b>100.0</b>	<b>56,349</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	1.2	1.2	157	0.4	0.8	2	0.9	1.7	201	0.4	1.1	3.0
Moderate	12	7.3	7.1	1,526	4.2	4.9	26	11.6	9.5	3,229	7.0	6.6	12.6
Middle	96	58.2	55.0	20,749	57.6	53.1	120	53.6	55.9	24,362	52.8	54.8	55.3
Upper	55	33.3	36.6	13,568	37.7	41.2	76	33.9	32.8	18,362	39.8	37.5	29.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>165</b>	<b>100.0</b>	<b>100.0</b>	<b>36,000</b>	<b>100.0</b>	<b>100.0</b>	<b>224</b>	<b>100.0</b>	<b>100.0</b>	<b>46,154</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	1	3.2	1.2	39	1.4	1.0	1	1.9	2.0	48	1.4	2.2	3.0
Moderate	1	3.2	7.7	17	0.6	6.2	8	15.4	9.8	298	8.6	8.1	12.6
Middle	16	51.6	56.7	1,881	65.8	55.0	24	46.2	54.5	1,684	48.4	54.3	55.3
Upper	13	41.9	34.3	923	32.3	37.8	19	36.5	33.5	1,450	41.7	35.4	29.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>2,860</b>	<b>100.0</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>3,480</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	3	30.0	15.8	22,936	25.9	14.5	3	30.0	20.1	7,236	4.3	13.9	
Moderate	4	40.0	22.3	28,290	31.9	16.4	2	20.0	29.0	15,965	9.5	16.7	19.4
Middle	2	20.0	45.7	26,800	30.2	41.8	3	30.0	38.8	100,682	60.2	48.9	42.2
Upper	1	10.0	14.7	10,634	12.0	27.2	2	20.0	11.2	43,500	26.0	20.5	23.7
Unknown	0	0.0	1.6	0	0.0	0.1	0	0.0	0.9	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>88,660</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>167,383</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	39	7.1	2.3	25,237	14.0	2.4	34	5.5	2.9	9,930	3.6	3.0	
Moderate	97	17.7	10.5	37,531	20.8	8.1	95	15.5	12.6	26,506	9.5	9.8	12.6
Middle	282	51.5	55.3	79,794	44.2	53.4	312	50.9	54.7	158,625	56.9	54.0	55.3
Upper	130	23.7	31.9	38,025	21.1	36.1	172	28.1	29.6	83,834	30.1	33.1	29.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>548</b>	<b>100.0</b>	<b>100.0</b>	<b>180,587</b>	<b>100.0</b>	<b>100.0</b>	<b>613</b>	<b>100.0</b>	<b>100.0</b>	<b>278,895</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	30	14.5	8.9	3,698	10.0	10.9	9.7
Moderate	21	10.1	10.3	3,384	9.1	11.0	12.1
Middle	93	44.9	48.7	17,357	46.8	46.1	49.3
Upper	62	30.0	30.4	11,992	32.4	31.0	28.5
Unknown	1	0.5	0.2	618	1.7	0.4	0.4
Tract-Unk	0	0.0	1.6	0	0.0	0.6	
<b>Total</b>	<b>207</b>	<b>100.0</b>	<b>100.0</b>	<b>37,049</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												
	2020						2021						Total Businesses %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	68	10.4	9.8	8,546	9.1	10.6	56	12.8	11.0	5,517	11.8	11.0	
Moderate	56	8.6	11.3	7,657	8.1	12.0	41	9.4	11.3	4,461	9.6	12.4	11.9
Middle	318	48.6	47.6	41,778	44.3	45.8	191	43.7	47.0	19,263	41.3	44.8	48.4
Upper	212	32.4	30.6	36,288	38.5	31.1	149	34.1	29.9	17,381	37.3	31.4	28.4
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0.4
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	
<b>Total</b>	<b>654</b>	<b>100.0</b>	<b>100.0</b>	<b>94,269</b>	<b>100.0</b>	<b>100.0</b>	<b>437</b>	<b>100.0</b>	<b>100.0</b>	<b>46,622</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>					<b>Families by Family Income %</b>	
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>			<b>Agg</b>
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>		<b>\$%</b>
<b>Home Purchase Loans</b>							
<b>Low</b>	29	13.2	8.7	2,798	7.2	5.0	20.0
<b>Moderate</b>	64	29.2	25.3	9,380	24.2	20.0	17.6
<b>Middle</b>	38	17.4	23.9	8,016	20.7	24.0	22.1
<b>Upper</b>	52	23.7	28.5	15,941	41.1	38.3	40.3
<b>Unknown</b>	36	16.4	13.5	2,614	6.7	12.7	0.0
<b>Total</b>	219	100.0	100.0	38,749	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	10	8.8	8.4	743	3.6	4.6	20.0
<b>Moderate</b>	24	21.2	19.5	2,744	13.2	14.5	17.6
<b>Middle</b>	28	24.8	26.3	4,246	20.4	24.0	22.1
<b>Upper</b>	47	41.6	36.4	12,188	58.5	46.0	40.3
<b>Unknown</b>	4	3.5	9.4	920	4.4	10.9	0.0
<b>Total</b>	113	100.0	100.0	20,841	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	3	8.3	8.1	139	5.9	6.1	20.0
<b>Moderate</b>	6	16.7	18.7	534	22.7	14.8	17.6
<b>Middle</b>	15	41.7	27.2	774	32.9	23.5	22.1
<b>Upper</b>	11	30.6	43.7	877	37.2	52.3	40.3
<b>Unknown</b>	1	2.8	2.3	32	1.4	3.4	0.0
<b>Total</b>	36	100.0	100.0	2,356	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	42	10.1	8.4	3,680	5.3	4.8	20.0
<b>Moderate</b>	94	22.6	22.2	12,658	18.3	17.9	17.6
<b>Middle</b>	81	19.5	24.6	13,036	18.9	23.6	22.1
<b>Upper</b>	110	26.4	32.5	29,006	42.0	40.7	40.3
<b>Unknown</b>	89	21.4	12.3	10,720	15.5	13.0	0.0
<b>Total</b>	416	100.0	100.0	69,100	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	37	18.8	12.8	3,670	10.9	8.0	32	11.2	10.7	4,077	7.2	6.5	20.0
Moderate	53	26.9	28.3	8,030	23.8	23.6	81	28.4	26.7	14,097	25.0	21.9	17.6
Middle	32	16.2	22.7	7,580	22.4	23.7	46	16.1	22.9	11,299	20.1	23.2	22.1
Upper	31	15.7	24.9	11,337	33.6	34.7	59	20.7	27.4	21,357	37.9	37.4	40.3
Unknown	44	22.3	11.3	3,164	9.4	10.0	67	23.5	12.4	5,519	9.8	11.0	0.0
<b>Total</b>	<b>197</b>	<b>100.0</b>	<b>100.0</b>	<b>33,781</b>	<b>100.0</b>	<b>100.0</b>	<b>285</b>	<b>100.0</b>	<b>100.0</b>	<b>56,349</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	8	4.8	6.8	948	2.6	3.7	20	8.9	7.2	2,370	5.1	4.1	20.0
Moderate	39	23.6	20.1	6,081	16.9	15.1	39	17.4	20.3	5,924	12.8	15.4	17.6
Middle	42	25.5	26.8	7,589	21.1	25.2	65	29.0	26.6	11,488	24.9	24.8	22.1
Upper	69	41.8	37.9	20,014	55.6	46.8	90	40.2	36.5	24,501	53.1	45.3	40.3
Unknown	7	4.2	8.4	1,368	3.8	9.2	10	4.5	9.5	1,871	4.1	10.3	0.0
<b>Total</b>	<b>165</b>	<b>100.0</b>	<b>100.0</b>	<b>36,000</b>	<b>100.0</b>	<b>100.0</b>	<b>224</b>	<b>100.0</b>	<b>100.0</b>	<b>46,154</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	3	9.7	8.2	82	2.9	6.4	1	1.9	7.3	75	2.2	5.6	20.0
Moderate	9	29.0	22.4	422	14.8	17.2	14	26.9	20.2	675	19.4	17.6	17.6
Middle	7	22.6	27.7	431	15.1	25.0	13	25.0	26.9	1,040	29.9	23.3	22.1
Upper	11	35.5	39.9	1,815	63.5	48.5	21	40.4	43.7	1,466	42.1	50.4	40.3
Unknown	1	3.2	1.7	110	3.8	2.9	3	5.8	1.9	224	6.4	3.1	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>2,860</b>	<b>100.0</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>3,480</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	48	8.9	9.2	4,700	5.1	5.7	53	8.8	8.6	6,522	5.8	5.4	20.0
Moderate	101	18.8	22.8	14,533	15.8	18.7	134	22.2	22.7	20,696	18.6	18.6	17.6
Middle	81	15.1	24.1	15,600	17.0	23.7	124	20.6	24.8	23,827	21.4	23.8	22.1
Upper	111	20.6	31.3	33,166	36.1	40.0	170	28.2	32.8	47,324	42.4	41.2	40.3
Unknown	197	36.6	12.6	23,928	26.0	11.8	122	20.2	11.1	13,143	11.8	11.1	0.0
<b>Total</b>	<b>538</b>	<b>100.0</b>	<b>100.0</b>	<b>91,927</b>	<b>100.0</b>	<b>100.0</b>	<b>603</b>	<b>100.0</b>	<b>100.0</b>	<b>111,512</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
\$1 Million or Less	112	54.1	41.7	12,229	33.0	29.0	89.8
Over \$1 Million	86	41.5		22,964	62.0		9.0
Revenue Unknown	9	4.3		1,856	5.0		1.3
<b>Total</b>	<b>207</b>	<b>100.0</b>		<b>37,049</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	134	64.7	94.2	4,102	11.1	37.5	
\$100,001 - \$250,000	26	12.6	2.8	4,646	12.5	13.8	
\$250,001 - \$1 Million	47	22.7	3.0	28,301	76.4	48.7	
<b>Total</b>	<b>207</b>	<b>100.0</b>	<b>100.0</b>	<b>37,049</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	87	77.7		2,200	18.0		
\$100,001 - \$250,000	10	8.9		1,745	14.3		
\$250,001 - \$1 Million	15	13.4		8,284	67.7		
<b>Total</b>	<b>112</b>	<b>100.0</b>		<b>12,229</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>													
\$1 Million or Less	232	35.5	34.8	20,185	21.4	20.0	171	39.1	41.7	10,649	22.8	23.8	90.1
Over \$1 Million	214	32.7		50,542	53.6		98	22.4		23,105	49.6		8.4
Revenue Unknown	208	31.8		23,542	25.0		168	38.4		12,868	27.6		1.5
<b>Total</b>	<b>654</b>	<b>100.0</b>		<b>94,269</b>	<b>100.0</b>		<b>437</b>	<b>100.0</b>		<b>46,622</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	403	61.6	86.3	14,628	15.5	29.3	306	70.0	91.0	8,805	18.9	33.9	
\$100,001 - \$250,000	137	20.9	7.7	22,784	24.2	21.0	80	18.3	5.1	13,834	29.7	19.2	
\$250,001 - \$1 Million	114	17.4	6.0	56,857	60.3	49.7	51	11.7	3.9	23,983	51.4	46.9	
<b>Total</b>	<b>654</b>	<b>100.0</b>	<b>100.0</b>	<b>94,269</b>	<b>100.0</b>	<b>100.0</b>	<b>437</b>	<b>100.0</b>	<b>100.0</b>	<b>46,622</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	188	81.0		5,302	26.3		141	82.5		3,285	30.8		
\$100,001 - \$250,000	23	9.9		3,494	17.3		21	12.3		3,512	33.0		
\$250,001 - \$1 Million	21	9.1		11,389	56.4		9	5.3		3,852	36.2		
<b>Total</b>	<b>232</b>	<b>100.0</b>		<b>20,185</b>	<b>100.0</b>		<b>171</b>	<b>100.0</b>		<b>10,649</b>	<b>100.0</b>		

Distribution of 2019 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)	%	%	
<b>Home Purchase Loans</b>							
Low	129	6.9	4.7	11,362	3.6	2.8	6.9
Moderate	202	10.8	10.0	19,934	6.3	6.6	11.4
Middle	841	44.8	47.1	121,933	38.5	41.3	43.8
Upper	706	37.6	38.2	162,826	51.5	49.2	37.9
Unknown	1	0.1	0.1	352	0.1	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,879	100.0	100.0	316,407	100.0	100.0	100.0
<b>Refinance Loans</b>							
Low	34	2.8	3.2	2,169	1.3	2.0	6.9
Moderate	97	8.0	7.8	8,511	4.9	5.3	11.4
Middle	468	38.6	41.8	54,856	31.8	35.1	43.8
Upper	612	50.5	47.1	107,114	62.0	57.6	37.9
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	1,211	100.0	100.0	172,650	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
Low	37	4.7	4.8	1,322	3.2	3.9	6.9
Moderate	80	10.3	9.0	3,445	8.3	7.5	11.4
Middle	321	41.2	41.7	14,902	36.1	36.1	43.8
Upper	341	43.8	44.5	21,621	52.4	52.1	37.9
Unknown	0	0.0	0.0	0	0.0	0.5	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	779	100.0	100.0	41,290	100.0	100.0	100.0
<b>Multifamily Loans</b>							Multi-family Units %
Low	2	8.0	16.3	525	0.3	7.2	17.3
Moderate	4	16.0	16.3	1,248	0.7	4.6	12.8
Middle	11	44.0	41.3	150,500	83.1	56.1	39.5
Upper	8	32.0	25.0	28,780	15.9	31.2	29.1
Unknown	0	0.0	1.0	0	0.0	0.8	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	181,053	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							Owner Occupied Units %
Low	213	5.3	4.4	16,021	2.2	3.4	6.9
Moderate	397	10.0	9.3	34,112	4.7	6.0	11.4
Middle	1,680	42.2	44.5	346,329	48.1	42.1	43.8
Upper	1,694	42.5	41.8	323,439	44.9	48.2	37.9
Unknown	1	0.0	0.1	352	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3,985	100.0	100.0	720,253	100.0	100.0	100.0

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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	127	6.8	4.6	11,513	3.4	2.7	176	9.0	5.2	19,520	5.0	3.2	6.9
Moderate	217	11.6	10.5	25,649	7.6	7.1	241	12.4	11.5	31,550	8.1	8.0	11.4
Middle	793	42.3	45.7	121,371	36.0	40.6	832	42.7	46.5	152,929	39.3	41.9	43.8
Upper	737	39.3	39.2	177,745	52.8	49.6	696	35.7	36.6	184,802	47.5	46.8	37.9
Unknown	1	0.1	0.0	405	0.1	0.0	3	0.2	0.1	521	0.1	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	
<b>Total</b>	<b>1,875</b>	<b>100.0</b>	<b>100.0</b>	<b>336,683</b>	<b>100.0</b>	<b>100.0</b>	<b>1,948</b>	<b>100.0</b>	<b>100.0</b>	<b>389,322</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	49	2.7	2.1	4,811	1.5	1.3	63	3.4	2.5	6,041	1.9	1.5	6.9
Moderate	90	4.9	5.5	9,718	3.1	3.5	131	7.0	7.1	13,188	4.2	4.6	11.4
Middle	654	36.0	38.6	88,322	27.8	31.3	779	41.8	41.7	108,953	34.7	34.8	43.8
Upper	1,024	56.3	53.8	213,679	67.3	63.8	891	47.8	48.7	186,182	59.2	58.5	37.9
Unknown	2	0.1	0.0	1,050	0.3	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	
<b>Total</b>	<b>1,819</b>	<b>100.0</b>	<b>100.0</b>	<b>317,580</b>	<b>100.0</b>	<b>100.0</b>	<b>1,864</b>	<b>100.0</b>	<b>100.0</b>	<b>314,364</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	31	4.4	4.7	1,727	4.0	3.7	38	5.4	4.8	2,091	4.3	3.3	6.9
Moderate	56	8.0	7.6	2,856	6.5	6.4	58	8.3	9.4	3,175	6.6	7.3	11.4
Middle	283	40.5	41.0	13,933	31.9	34.6	292	41.7	40.5	16,695	34.4	35.8	43.8
Upper	328	47.0	46.6	25,203	57.6	55.3	312	44.6	45.3	26,507	54.7	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	
<b>Total</b>	<b>698</b>	<b>100.0</b>	<b>100.0</b>	<b>43,719</b>	<b>100.0</b>	<b>100.0</b>	<b>700</b>	<b>100.0</b>	<b>100.0</b>	<b>48,468</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	5	18.5	16.0	12,907	22.5	9.1	2	8.3	13.9	403	0.2	4.5	17.3
Moderate	2	7.4	18.0	585	1.0	8.2	9	37.5	19.9	7,140	4.0	9.2	12.8
Middle	11	40.7	40.2	22,079	38.5	33.6	8	33.3	40.3	119,125	66.6	38.2	39.5
Upper	7	25.9	23.7	15,920	27.8	43.3	5	20.8	24.2	52,105	29.1	42.1	29.1
Unknown	2	7.4	2.1	5,850	10.2	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	
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>57,341</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>178,773</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	231	4.9	3.6	32,304	4.1	2.6	289	6.2	4.0	28,567	3.0	2.6	6.9
Moderate	411	8.7	8.3	42,492	5.4	5.7	461	9.9	9.4	56,475	6.0	6.8	11.4
Middle	1,881	40.0	42.1	258,802	33.0	35.9	1,971	42.3	43.8	402,994	42.8	38.5	43.8
Upper	2,172	46.2	46.0	444,460	56.6	55.3	1,934	41.5	42.8	452,763	48.1	51.3	37.9
Unknown	5	0.1	0.0	7,305	0.9	0.5	3	0.1	0.1	521	0.1	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	
<b>Total</b>	<b>4,700</b>	<b>100.0</b>	<b>100.0</b>	<b>785,363</b>	<b>100.0</b>	<b>100.0</b>	<b>4,658</b>	<b>100.0</b>	<b>100.0</b>	<b>941,320</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 15380 (Buffalo-Cheektowaga, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Business %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	137	9.3	9.8	13,728	8.4	10.6	8.9
Moderate	206	13.9	11.3	26,592	16.3	13.0	11.9
Middle	535	36.1	36.0	49,709	30.5	34.3	37.7
Upper	555	37.5	39.6	63,109	38.7	37.9	38.2
Unknown	48	3.2	2.4	10,084	6.2	4.1	3.3
Tract-Unk	0	0.0	0.9	0	0.0	0.2	
<b>Total</b>	<b>1,481</b>	<b>100.0</b>	<b>100.0</b>	<b>163,222</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: MSA 15380 (Buffalo-Cheektowaga, NY)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Business %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
Low	441	8.8	9.0	53,128	9.8	9.6	342	9.2	10.1	30,905	8.8	9.4	9.3	
Moderate	615	12.3	11.2	64,367	11.8	12.4	472	12.7	11.7	47,364	13.6	13.2	11.9	
Middle	1,781	35.5	36.3	198,820	36.6	36.2	1,319	35.5	35.3	129,854	37.2	35.7	37.1	
Upper	2,003	39.9	40.6	202,060	37.2	36.7	1,457	39.3	40.1	122,547	35.1	36.4	38.4	
Unknown	180	3.6	2.8	24,894	4.6	5.0	122	3.3	2.6	18,595	5.3	5.3	3.3	
Tract-Unk	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0		
<b>Total</b>	<b>5,020</b>	<b>100.0</b>	<b>100.0</b>	<b>543,269</b>	<b>100.0</b>	<b>100.0</b>	<b>3,712</b>	<b>100.0</b>	<b>100.0</b>	<b>349,265</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 15380 (Buffalo-Cheektowaga, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	222	11.8	9.4	18,241	5.8	5.4	22.2
<b>Moderate</b>	505	26.9	25.1	55,913	17.7	18.9	16.6
<b>Middle</b>	340	18.1	22.7	55,429	17.5	21.9	20.3
<b>Upper</b>	511	27.2	28.7	134,654	42.6	39.7	40.9
<b>Unknown</b>	301	16.0	14.2	52,170	16.5	14.1	0.0
<b>Total</b>	1,879	100.0	100.0	316,407	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	126	10.4	9.4	8,537	4.9	5.2	22.2
<b>Moderate</b>	226	18.7	20.4	20,280	11.7	14.6	16.6
<b>Middle</b>	278	23.0	23.9	33,587	19.5	21.3	20.3
<b>Upper</b>	487	40.2	37.1	93,559	54.2	47.9	40.9
<b>Unknown</b>	94	7.8	9.1	16,687	9.7	11.0	0.0
<b>Total</b>	1,211	100.0	100.0	172,650	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	97	12.5	10.4	3,730	9.0	7.6	22.2
<b>Moderate</b>	149	19.1	19.4	6,167	14.9	15.7	16.6
<b>Middle</b>	209	26.8	26.8	10,440	25.3	23.9	20.3
<b>Upper</b>	254	32.6	39.0	17,001	41.2	47.8	40.9
<b>Unknown</b>	70	9.0	4.5	3,952	9.6	5.0	0.0
<b>Total</b>	779	100.0	100.0	41,290	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	445	11.2	9.4	30,508	5.7	5.4	22.2
<b>Moderate</b>	880	22.2	22.4	82,360	15.3	17.1	16.6
<b>Middle</b>	827	20.9	23.1	99,456	18.4	21.6	20.3
<b>Upper</b>	1,252	31.6	32.3	245,214	45.5	42.4	40.9
<b>Unknown</b>	556	14.0	12.8	81,662	15.1	13.4	0.0
<b>Total</b>	3,960	100.0	100.0	539,200	100.0	100.0	100.0

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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	177	9.4	8.6	17,384	5.2	4.9	200	10.3	9.0	23,854	6.1	5.3	22.2
Moderate	447	23.8	26.1	58,892	17.5	19.9	449	23.0	24.4	67,873	17.4	18.7	16.6
Middle	382	20.4	21.8	66,690	19.8	20.7	364	18.7	21.6	72,379	18.6	20.7	20.3
Upper	492	26.2	28.9	129,152	38.4	39.8	557	28.6	28.6	164,659	42.3	39.3	40.9
Unknown	377	20.1	14.7	64,565	19.2	14.7	378	19.4	16.5	60,557	15.6	16.1	0.0
<b>Total</b>	<b>1,875</b>	<b>100.0</b>	<b>100.0</b>	<b>336,683</b>	<b>100.0</b>	<b>100.0</b>	<b>1,948</b>	<b>100.0</b>	<b>100.0</b>	<b>389,322</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	109	6.0	4.9	7,610	2.4	2.4	136	7.3	6.8	11,297	3.6	3.7	22.2
Moderate	307	16.9	15.8	31,607	10.0	10.2	324	17.4	18.5	37,241	11.8	12.9	16.6
Middle	384	21.1	24.6	54,522	17.2	20.7	462	24.8	25.5	68,071	21.7	22.6	20.3
Upper	850	46.7	44.0	191,340	60.2	54.7	773	41.5	38.9	168,272	53.5	48.9	40.9
Unknown	169	9.3	10.7	32,501	10.2	12.0	169	9.1	10.3	29,483	9.4	11.9	0.0
<b>Total</b>	<b>1,819</b>	<b>100.0</b>	<b>100.0</b>	<b>317,580</b>	<b>100.0</b>	<b>100.0</b>	<b>1,864</b>	<b>100.0</b>	<b>100.0</b>	<b>314,364</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	55	7.9	8.6	2,444	5.6	6.2	63	9.0	9.0	2,834	5.8	6.4	22.2
Moderate	114	16.3	18.3	5,371	12.3	14.4	124	17.7	19.7	6,022	12.4	15.5	16.6
Middle	171	24.5	24.1	9,871	22.6	22.6	157	22.4	23.8	9,521	19.6	22.3	20.3
Upper	270	38.7	42.7	21,018	48.1	49.8	285	40.7	42.7	25,488	52.6	50.2	40.9
Unknown	88	12.6	6.3	5,015	11.5	7.0	71	10.1	4.9	4,603	9.5	5.6	0.0
<b>Total</b>	<b>698</b>	<b>100.0</b>	<b>100.0</b>	<b>43,719</b>	<b>100.0</b>	<b>100.0</b>	<b>700</b>	<b>100.0</b>	<b>100.0</b>	<b>48,468</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	341	7.3	6.7	27,438	3.8	3.7	399	8.6	7.9	37,985	5.0	4.6	22.2
Moderate	868	18.6	19.8	95,870	13.2	14.8	897	19.4	20.9	111,136	14.6	15.8	16.6
Middle	937	20.1	22.3	131,083	18.0	20.2	983	21.2	23.3	149,971	19.7	21.5	20.3
Upper	1,612	34.5	35.7	341,510	46.9	46.2	1,615	34.9	34.3	358,419	47.0	43.9	40.9
Unknown	915	19.6	15.5	132,121	18.1	15.1	740	16.0	13.6	105,036	13.8	14.2	0.0
<b>Total</b>	<b>4,673</b>	<b>100.0</b>	<b>100.0</b>	<b>728,022</b>	<b>100.0</b>	<b>100.0</b>	<b>4,634</b>	<b>100.0</b>	<b>100.0</b>	<b>762,547</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 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)	%	%							
<b>By Revenue</b>													
\$1 Million or Less	920	62.1	42.6	52,052	31.9	33.0	88.9						
Over \$1 Million	506	34.2		96,731	59.3		10.1						
Revenue Unknown	55	3.7		14,439	8.8		1.0						
<b>Total</b>	<b>1,481</b>	<b>100.0</b>		<b>163,222</b>	<b>100.0</b>		<b>100.0</b>						
<b>By Loan Size</b>													
\$100,000 or Less	1,141	77.0	93.2	30,914	18.9	34.4							
\$100,001 - \$250,000	148	10.0	3.3	27,175	16.6	14.8							
\$250,001 - \$1 Million	192	13.0	3.5	105,133	64.4	50.8							
<b>Total</b>	<b>1,481</b>	<b>100.0</b>	<b>100.0</b>	<b>163,222</b>	<b>100.0</b>	<b>100.0</b>							
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	801	87.1		16,988	32.6								
\$100,001 - \$250,000	68	7.4		12,091	23.2								
\$250,001 - \$1 Million	51	5.5		22,973	44.1								
<b>Total</b>	<b>920</b>	<b>100.0</b>		<b>52,052</b>	<b>100.0</b>								
Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 15380 (Buffalo-Cheektowaga, NY)													
	Bank And Aggregate Loans By Year												
	2020						2021						Total Businesses %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	2,052	40.9	39.0	111,033	20.4	23.8	1,205	32.5	43.1	62,804	18.0	24.8	89.1
Over \$1 Million	1,215	24.2		312,370	57.5		753	20.3		181,867	52.1		9.8
Revenue Unknown	1,753	34.9		119,866	22.1		1,754	47.3		104,594	29.9		1.1
<b>Total</b>	<b>5,020</b>	<b>100.0</b>		<b>543,269</b>	<b>100.0</b>		<b>3,712</b>	<b>100.0</b>		<b>349,265</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	3,647	72.6	84.6	115,007	21.2	28.9	2,829	76.2	89.6	76,899	22.0	32.5	
\$100,001 - \$250,000	773	15.4	8.9	125,512	23.1	22.0	493	13.3	5.9	78,936	22.6	19.9	
\$250,001 - \$1 Million	600	12.0	6.4	302,750	55.7	49.1	390	10.5	4.5	193,430	55.4	47.6	
<b>Total</b>	<b>5,020</b>	<b>100.0</b>	<b>100.0</b>	<b>543,269</b>	<b>100.0</b>	<b>100.0</b>	<b>3,712</b>	<b>100.0</b>	<b>100.0</b>	<b>349,265</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	1,838	89.6		51,043	46.0		1,065	88.4		25,741	41.0		
\$100,001 - \$250,000	142	6.9		22,666	20.4		93	7.7		14,865	23.7		
\$250,001 - \$1 Million	72	3.5		37,324	33.6		47	3.9		22,198	35.3		
<b>Total</b>	<b>2,052</b>	<b>100.0</b>		<b>111,033</b>	<b>100.0</b>		<b>1,205</b>	<b>100.0</b>		<b>62,804</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 40380 (Rochester, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	21	3.4	3.1	1,196	1.7	1.6	3.4
Moderate	114	18.5	11.7	7,875	11.4	7.3	11.6
Middle	340	55.2	50.2	36,510	53.0	44.9	51.9
Upper	141	22.9	35.0	23,311	33.8	46.2	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>616</b>	<b>100.0</b>	<b>100.0</b>	<b>68,892</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	10	2.7	2.4	1,131	2.4	1.6	3.4
Moderate	24	6.6	9.4	2,274	4.9	6.3	11.6
Middle	176	48.4	48.6	19,249	41.1	42.8	51.9
Upper	154	42.3	39.6	24,220	51.7	49.3	33.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>364</b>	<b>100.0</b>	<b>100.0</b>	<b>46,874</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	7	3.5	2.3	338	2.8	1.5	3.4
Moderate	10	5.0	8.9	330	2.7	6.1	11.6
Middle	97	48.7	48.8	5,163	42.6	45.4	51.9
Upper	84	42.2	40.0	6,279	51.8	46.9	33.0
Unknown	1	0.5	0.0	15	0.1	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>199</b>	<b>100.0</b>	<b>100.0</b>	<b>12,125</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	2	11.1	18.8	493	1.6	4.5	16.7
Moderate	3	16.7	29.9	1,679	5.5	16.8	18.8
Middle	11	61.1	36.8	27,157	89.0	38.2	39.8
Upper	2	11.1	14.5	1,172	3.8	40.5	24.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>30,501</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	44	3.5	2.9	3,343	2.0	1.8	3.4
Moderate	167	13.2	10.8	13,259	8.0	7.7	11.6
Middle	662	52.4	49.5	92,066	55.8	44.0	51.9
Upper	390	30.9	36.7	56,371	34.2	46.5	33.0
Unknown	1	0.1	0.0	15	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1,264</b>	<b>100.0</b>	<b>100.0</b>	<b>165,054</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 40380 (Rochester, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	34	5.0	3.4	1,669	2.2	1.8	55	6.3	4.0	3,704	3.6	2.2	3.4
Moderate	159	23.6	12.4	12,227	16.0	7.9	232	26.5	13.6	19,389	18.9	8.8	11.6
Middle	371	55.0	49.3	42,855	56.1	44.8	441	50.4	49.7	54,127	52.9	45.4	51.9
Upper	110	16.3	34.9	19,669	25.7	45.4	147	16.8	32.7	25,143	24.6	43.5	33.0
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	
<b>Total</b>	<b>674</b>	<b>100.0</b>	<b>100.0</b>	<b>76,420</b>	<b>100.0</b>	<b>100.0</b>	<b>875</b>	<b>100.0</b>	<b>100.0</b>	<b>102,363</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	0.8	1.4	257	0.5	1.0	10	2.1	1.5	919	1.3	1.0	3.4
Moderate	25	6.4	5.9	2,198	4.0	3.9	34	7.0	7.7	3,307	4.7	5.3	11.6
Middle	167	42.5	44.0	20,349	37.4	36.7	233	47.8	48.8	27,933	39.7	42.5	51.9
Upper	198	50.4	48.6	31,559	58.1	58.4	210	43.1	42.0	38,165	54.3	51.2	33.0
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	
<b>Total</b>	<b>393</b>	<b>100.0</b>	<b>100.0</b>	<b>54,363</b>	<b>100.0</b>	<b>100.0</b>	<b>487</b>	<b>100.0</b>	<b>100.0</b>	<b>70,324</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	3	1.5	2.1	175	1.5	1.3	4	2.2	1.7	130	1.1	1.0	3.4
Moderate	12	6.0	8.1	452	3.8	5.5	21	11.5	9.2	732	5.9	6.4	11.6
Middle	105	52.5	51.1	5,612	46.9	45.5	93	50.8	52.1	5,727	46.5	45.0	51.9
Upper	80	40.0	38.7	5,726	47.9	47.7	65	35.5	37.0	5,725	46.5	47.6	33.0
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	
<b>Total</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>11,965</b>	<b>100.0</b>	<b>100.0</b>	<b>183</b>	<b>100.0</b>	<b>100.0</b>	<b>12,314</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	7	25.0	24.0	10,520	5.2	8.0	3	18.8	26.8	3,250	3.4	21.3	16.7
Moderate	5	17.9	23.5	8,554	4.2	15.7	4	25.0	23.5	5,439	5.6	7.1	18.8
Middle	12	42.9	36.8	99,938	49.2	32.2	5	31.3	36.3	42,202	43.6	44.2	39.8
Upper	4	14.3	15.2	83,956	41.4	44.0	4	25.0	13.4	45,943	47.4	27.4	24.5
Unknown	0	0.0	0.5	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>202,968</b>	<b>100.0</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>96,834</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	58	3.8	2.6	13,213	3.6	2.2	76	4.7	2.8	8,198	2.8	3.7	3.4
Moderate	238	15.8	9.5	25,976	7.1	7.2	308	18.8	10.6	29,972	10.4	7.2	11.6
Middle	771	51.1	47.2	180,927	49.2	40.2	813	49.8	49.5	133,711	46.4	44.2	51.9
Upper	442	29.3	40.7	147,676	40.2	50.3	437	26.7	37.1	116,270	40.4	44.9	33.0
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	
<b>Total</b>	<b>1,509</b>	<b>100.0</b>	<b>100.0</b>	<b>367,792</b>	<b>100.0</b>	<b>100.0</b>	<b>1,634</b>	<b>100.0</b>	<b>100.0</b>	<b>288,151</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 40380 (Rochester, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Low	99	9.9	7.5	17,031	13.6	8.9	9.0
Moderate	100	10.1	11.2	15,996	12.8	13.7	13.7
Middle	414	41.6	43.6	42,465	34.0	42.3	44.7
Upper	381	38.3	36.5	49,315	39.5	34.6	32.4
Unknown	1	0.1	0.1	180	0.1	0.2	0.2
Tract-Unk	0	0.0	1.0	0	0.0	0.3	
<b>Total</b>	<b>995</b>	<b>100.0</b>	<b>100.0</b>	<b>124,987</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 40380 (Rochester, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	300	11.2	8.2	37,012	12.4	10.0	185	9.1	8.4	23,632	11.7	10.2	9.2
Moderate	223	8.3	11.1	31,447	10.5	12.4	157	7.8	11.2	18,482	9.1	11.9	13.6
Middle	1,101	41.0	43.7	120,593	40.3	43.3	867	42.9	44.8	79,338	39.3	44.0	44.3
Upper	1,058	39.4	36.7	108,212	36.2	33.9	811	40.1	35.2	80,032	39.6	33.8	32.7
Unknown	5	0.2	0.1	1,757	0.6	0.3	2	0.1	0.1	651	0.3	0.1	0.2
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>2,687</b>	<b>100.0</b>	<b>100.0</b>	<b>299,021</b>	<b>100.0</b>	<b>100.0</b>	<b>2,022</b>	<b>100.0</b>	<b>100.0</b>	<b>202,135</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 40380 (Rochester, NY)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	104	16.9	9.3	7,404	10.7	5.1	21.9
Moderate	204	33.1	24.8	19,241	27.9	18.5	17.1
Middle	92	14.9	21.7	12,410	18.0	20.6	19.9
Upper	111	18.0	31.1	26,276	38.1	43.7	41.2
Unknown	105	17.0	13.2	3,561	5.2	12.1	0.0
<b>Total</b>	<b>616</b>	<b>100.0</b>	<b>100.0</b>	<b>68,892</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	37	10.2	9.3	2,510	5.4	5.2	21.9
Moderate	82	22.5	20.5	6,917	14.8	14.2	17.1
Middle	75	20.6	23.7	8,150	17.4	20.1	19.9
Upper	159	43.7	39.1	26,731	57.0	51.4	41.2
Unknown	11	3.0	7.5	2,566	5.5	9.1	0.0
<b>Total</b>	<b>364</b>	<b>100.0</b>	<b>100.0</b>	<b>46,874</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	15	7.5	7.5	430	3.5	4.9	21.9
Moderate	32	16.1	19.1	1,172	9.7	15.1	17.1
Middle	46	23.1	25.8	2,317	19.1	23.0	19.9
Upper	100	50.3	46.0	7,841	64.7	55.3	41.2
Unknown	6	3.0	1.6	365	3.0	1.8	0.0
<b>Total</b>	<b>199</b>	<b>100.0</b>	<b>100.0</b>	<b>12,125</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	156	12.5	9.1	10,344	7.7	5.2	21.9
Moderate	318	25.5	22.4	27,330	20.3	16.9	17.1
Middle	213	17.1	22.4	22,877	17.0	20.3	19.9
Upper	370	29.7	35.0	60,848	45.2	46.1	41.2
Unknown	189	15.2	11.1	13,154	9.8	11.5	0.0
<b>Total</b>	<b>1,246</b>	<b>100.0</b>	<b>100.0</b>	<b>134,553</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 40380 (Rochester, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	123	18.2	9.5	8,360	10.9	5.3	188	21.5	11.8	17,502	17.1	6.9	21.9
Moderate	201	29.8	23.0	20,503	26.8	17.4	297	33.9	24.6	35,663	34.8	19.1	17.1
Middle	141	20.9	22.0	19,960	26.1	20.3	157	17.9	20.4	21,724	21.2	19.7	19.9
Upper	87	12.9	32.4	18,515	24.2	44.0	94	10.7	28.4	19,963	19.5	39.6	41.2
Unknown	122	18.1	13.1	9,082	11.9	13.0	139	15.9	14.8	7,511	7.3	14.6	0.0
<b>Total</b>	<b>674</b>	<b>100.0</b>	<b>100.0</b>	<b>76,420</b>	<b>100.0</b>	<b>100.0</b>	<b>875</b>	<b>100.0</b>	<b>100.0</b>	<b>102,363</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	28	7.1	4.8	2,046	3.8	2.4	53	10.9	7.9	4,198	6.0	4.3	21.9
Moderate	70	17.8	15.0	6,523	12.0	9.6	129	26.5	20.6	13,671	19.4	14.5	17.1
Middle	101	25.7	24.3	11,805	21.7	19.8	117	24.0	24.4	16,186	23.0	21.4	19.9
Upper	174	44.3	49.1	30,415	55.9	60.6	170	34.9	36.1	33,173	47.2	46.0	41.2
Unknown	20	5.1	6.8	3,574	6.6	7.7	18	3.7	11.0	3,096	4.4	13.8	0.0
<b>Total</b>	<b>393</b>	<b>100.0</b>	<b>100.0</b>	<b>54,363</b>	<b>100.0</b>	<b>100.0</b>	<b>487</b>	<b>100.0</b>	<b>100.0</b>	<b>70,324</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	22	11.0	7.2	948	7.9	5.4	28	15.3	8.9	1,290	10.5	6.7	21.9
Moderate	37	18.5	19.2	1,750	14.6	14.0	46	25.1	23.5	2,737	22.2	18.6	17.1
Middle	48	24.0	24.0	2,791	23.3	21.2	52	28.4	26.1	3,326	27.0	22.7	19.9
Upper	89	44.5	47.2	6,280	52.5	55.6	55	30.1	40.2	4,906	39.8	50.1	41.2
Unknown	4	2.0	2.3	196	1.6	3.9	2	1.1	1.3	55	0.4	1.8	0.0
<b>Total</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>11,965</b>	<b>100.0</b>	<b>100.0</b>	<b>183</b>	<b>100.0</b>	<b>100.0</b>	<b>12,314</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	173	11.7	7.0	11,354	6.9	3.9	269	16.6	9.6	22,990	12.0	5.7	21.9
Moderate	308	20.8	18.2	28,776	17.5	13.3	472	29.2	22.5	52,071	27.2	17.0	17.1
Middle	290	19.6	22.4	34,556	21.0	19.6	326	20.1	22.7	41,236	21.6	20.5	19.9
Upper	350	23.6	39.5	55,210	33.5	50.9	319	19.7	32.8	58,042	30.3	42.8	41.2
Unknown	360	24.3	12.9	34,928	21.2	12.4	232	14.3	12.4	16,978	8.9	14.0	0.0
<b>Total</b>	<b>1,481</b>	<b>100.0</b>	<b>100.0</b>	<b>164,824</b>	<b>100.0</b>	<b>100.0</b>	<b>1,618</b>	<b>100.0</b>	<b>100.0</b>	<b>191,317</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 40380 (Rochester, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
\$1 Million or Less	622	62.5	45.3	41,339	33.1	31.6	89.5
Over \$1 Million	340	34.2		75,193	60.2		9.5
Revenue Unknown	33	3.3		8,455	6.8		1.0
<b>Total</b>	<b>995</b>	<b>100.0</b>		<b>124,987</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	736	74.0	93.7	20,578	16.5	37.8	
\$100,001 - \$250,000	116	11.7	3.3	21,598	17.3	15.7	
\$250,001 - \$1 Million	143	14.4	3.0	82,811	66.3	46.5	
<b>Total</b>	<b>995</b>	<b>100.0</b>	<b>100.0</b>	<b>124,987</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	529	85.0		11,597	28.1		
\$100,001 - \$250,000	54	8.7		9,489	23.0		
\$250,001 - \$1 Million	39	6.3		20,253	49.0		
<b>Total</b>	<b>622</b>	<b>100.0</b>		<b>41,339</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 40380 (Rochester, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	1,160	43.2	33.3	62,047	20.8	21.5	785	38.8	41.2	47,212	23.4	25.1	89.8
Over \$1 Million	754	28.1		176,675	59.1		480	23.7		110,256	54.5		9.1
Revenue Unknown	773	28.8		60,299	20.2		757	37.4		44,667	22.1		1.1
<b>Total</b>	<b>2,687</b>	<b>100.0</b>		<b>299,021</b>	<b>100.0</b>		<b>2,022</b>	<b>100.0</b>		<b>202,135</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	1,936	72.1	86.9	65,716	22.0	32.9	1,491	73.7	90.8	44,144	21.8	36.5	
\$100,001 - \$250,000	413	15.4	7.9	67,334	22.5	21.9	291	14.4	5.5	47,094	23.3	20.4	
\$250,001 - \$1 Million	338	12.6	5.3	165,971	55.5	45.2	240	11.9	3.7	110,897	54.9	43.2	
<b>Total</b>	<b>2,687</b>	<b>100.0</b>	<b>100.0</b>	<b>299,021</b>	<b>100.0</b>	<b>100.0</b>	<b>2,022</b>	<b>100.0</b>	<b>100.0</b>	<b>202,135</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	1,043	89.9		30,775	49.6		675	86.0		17,723	37.5		
\$100,001 - \$250,000	73	6.3		11,737	18.9		61	7.8		9,922	21.0		
\$250,001 - \$1 Million	44	3.8		19,535	31.5		49	6.2		19,567	41.4		
<b>Total</b>	<b>1,160</b>	<b>100.0</b>		<b>62,047</b>	<b>100.0</b>		<b>785</b>	<b>100.0</b>		<b>47,212</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 13780 (Binghamton, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	8	5.6	2.1	229	1.7	1.2	2.7
Moderate	25	17.4	9.9	1,697	12.2	6.6	9.3
Middle	72	50.0	56.7	6,870	49.6	54.3	60.1
Upper	39	27.1	31.4	5,058	36.5	37.9	27.9
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	
<b>Total</b>	<b>144</b>	<b>100.0</b>	<b>100.0</b>	<b>13,854</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	3	1.9	1.5	151	0.9	0.8	2.7
Moderate	11	7.1	6.6	628	3.9	4.4	9.3
Middle	66	42.3	59.5	6,624	41.2	56.3	60.1
Upper	76	48.7	32.3	8,663	53.9	38.5	27.9
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	
<b>Total</b>	<b>156</b>	<b>100.0</b>	<b>100.0</b>	<b>16,066</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.3	0	0.0	0.7	2.7
Moderate	6	12.8	7.6	220	10.4	6.9	9.3
Middle	23	48.9	59.3	1,065	50.4	57.9	60.1
Upper	18	38.3	31.8	827	39.2	34.4	27.9
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	
<b>Total</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>2,112</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	1	50.0	17.9	232	50.0	3.9	19.3
Moderate	1	50.0	17.9	232	50.0	13.3	22.6
Middle	0	0.0	59.0	0	0.0	77.0	45.1
Upper	0	0.0	5.1	0	0.0	5.8	13.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>464</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	12	3.2	2.0	612	1.8	1.3	2.7
Moderate	46	12.4	9.2	2,948	8.6	6.8	9.3
Middle	174	46.8	57.7	15,594	45.5	56.6	60.1
Upper	140	37.6	31.2	15,150	44.2	35.3	27.9
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	
<b>Total</b>	<b>372</b>	<b>100.0</b>	<b>100.0</b>	<b>34,304</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 13780 (Binghamton, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	4	2.3	2.2	289	1.5	1.3	11	5.0	2.8	878	3.3	1.6	2.7
Moderate	17	9.8	10.5	1,216	6.5	7.4	37	16.7	11.9	3,241	12.1	8.8	9.3
Middle	104	59.8	54.1	10,443	55.9	52.4	115	51.8	55.7	14,580	54.3	54.5	60.1
Upper	49	28.2	33.2	6,750	36.1	39.0	59	26.6	29.6	8,171	30.4	35.1	27.9
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	
<b>Total</b>	<b>174</b>	<b>100.0</b>	<b>100.0</b>	<b>18,698</b>	<b>100.0</b>	<b>100.0</b>	<b>222</b>	<b>100.0</b>	<b>100.0</b>	<b>26,870</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	4	2.5	1.0	247	1.3	1.1	7	4.8	1.5	461	2.7	0.9	2.7
Moderate	13	8.1	5.2	1,258	6.7	3.1	12	8.2	7.0	1,065	6.3	4.8	9.3
Middle	80	49.7	56.8	8,669	46.0	54.3	60	41.1	55.1	6,444	38.4	52.8	60.1
Upper	64	39.8	37.1	8,676	46.0	41.5	67	45.9	36.5	8,820	52.5	41.5	27.9
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	
<b>Total</b>	<b>161</b>	<b>100.0</b>	<b>100.0</b>	<b>18,850</b>	<b>100.0</b>	<b>100.0</b>	<b>146</b>	<b>100.0</b>	<b>100.0</b>	<b>16,790</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.3	0	0.0	1.6	1	1.6	1.2	25	0.9	0.6	2.7
Moderate	5	10.9	8.0	167	7.3	5.6	5	8.2	7.7	341	12.3	7.2	9.3
Middle	27	58.7	56.6	1,315	57.5	54.2	27	44.3	52.5	1,157	41.6	50.1	60.1
Upper	14	30.4	34.1	804	35.2	38.6	28	45.9	38.6	1,260	45.3	42.1	27.9
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	
<b>Total</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>2,286</b>	<b>100.0</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>2,783</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	18.2	0	0.0	9.9	2	25.0	32.6	1,540	21.7	11.8	
Moderate	0	0.0	18.2	0	0.0	9.4	1	12.5	14.0	220	3.1	26.5	22.6
Middle	4	80.0	48.5	14,902	97.1	74.2	5	62.5	51.2	5,328	75.2	61.3	45.1
Upper	1	20.0	15.2	451	2.9	6.5	0	0.0	2.3	0	0.0	0.4	13.0
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	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>15,353</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>7,088</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	13	3.0	1.9	847	1.4	2.0	23	5.0	2.4	3,032	5.5	2.3	
Moderate	46	10.6	8.9	3,351	5.6	6.3	56	12.2	9.7	4,945	8.9	8.9	9.3
Middle	236	54.6	55.5	37,450	63.1	55.0	223	48.5	55.5	28,731	51.9	54.6	60.1
Upper	137	31.7	33.7	17,730	29.9	36.6	158	34.3	32.4	18,614	33.6	34.2	27.9
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	
<b>Total</b>	<b>432</b>	<b>100.0</b>	<b>100.0</b>	<b>59,378</b>	<b>100.0</b>	<b>100.0</b>	<b>460</b>	<b>100.0</b>	<b>100.0</b>	<b>55,322</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 13780 (Binghamton, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	28	12.4	9.6	2,545	12.7	12.0	9.6
Moderate	28	12.4	12.0	4,189	20.9	14.3	11.9
Middle	119	52.9	56.6	11,127	55.5	59.3	58.4
Upper	50	22.2	20.5	2,184	10.9	13.9	20.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	0.6	
<b>Total</b>	<b>225</b>	<b>100.0</b>	<b>100.0</b>	<b>20,045</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: MSA 13780 (Binghamton, NY)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Businesses %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
Low	80	10.3	9.8	11,937	15.5	15.2	58	9.1	7.8	5,359	10.9	10.3	9.5	
Moderate	121	15.6	12.5	10,921	14.2	12.7	103	16.2	13.1	6,711	13.6	14.1	12.0	
Middle	439	56.5	58.1	44,366	57.5	58.1	345	54.4	57.8	29,224	59.4	58.0	58.4	
Upper	137	17.6	19.3	9,896	12.8	14.0	128	20.2	20.9	7,920	16.1	17.5	20.1	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1		
<b>Total</b>	<b>777</b>	<b>100.0</b>	<b>100.0</b>	<b>77,120</b>	<b>100.0</b>	<b>100.0</b>	<b>634</b>	<b>100.0</b>	<b>100.0</b>	<b>49,214</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	



<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 13780 (Binghamton, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	26	18.1	9.0	1,500	10.8	5.3	21.6
<b>Moderate</b>	36	25.0	24.9	3,631	26.2	19.8	16.9
<b>Middle</b>	31	21.5	23.6	4,199	30.3	22.7	21.6
<b>Upper</b>	23	16.0	29.4	3,964	28.6	40.7	39.9
<b>Unknown</b>	28	19.4	13.1	560	4.0	11.6	0.0
<b>Total</b>	144	100.0	100.0	13,854	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	23	14.7	10.8	1,436	8.9	6.0	21.6
<b>Moderate</b>	23	14.7	19.7	1,428	8.9	14.5	16.9
<b>Middle</b>	38	24.4	23.0	3,208	20.0	20.9	21.6
<b>Upper</b>	68	43.6	36.2	9,432	58.7	44.9	39.9
<b>Unknown</b>	4	2.6	10.3	562	3.5	13.7	0.0
<b>Total</b>	156	100.0	100.0	16,066	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	9	19.1	12.5	335	15.9	10.9	21.6
<b>Moderate</b>	14	29.8	18.8	619	29.3	15.9	16.9
<b>Middle</b>	9	19.1	27.2	345	16.3	25.4	21.6
<b>Upper</b>	14	29.8	39.2	783	37.1	45.7	39.9
<b>Unknown</b>	1	2.1	2.3	30	1.4	2.2	0.0
<b>Total</b>	47	100.0	100.0	2,112	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	58	15.7	9.9	3,271	9.7	5.8	21.6
<b>Moderate</b>	73	19.7	21.9	5,678	16.8	17.8	16.9
<b>Middle</b>	78	21.1	23.3	7,752	22.9	22.0	21.6
<b>Upper</b>	105	28.4	31.3	14,179	41.9	41.0	39.9
<b>Unknown</b>	56	15.1	13.6	2,960	8.7	13.5	0.0
<b>Total</b>	370	100.0	100.0	33,840	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 13780 (Binghamton, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	29	16.7	12.5	2,357	12.6	7.9	17	7.7	7.8	1,797	6.7	4.9	21.6
Moderate	43	24.7	24.7	4,778	25.6	20.5	50	22.5	22.8	5,515	20.5	18.1	16.9
Middle	32	18.4	22.1	4,392	23.5	22.7	56	25.2	23.5	7,191	26.8	22.3	21.6
Upper	29	16.7	26.2	5,244	28.0	36.2	56	25.2	30.9	9,677	36.0	41.0	39.9
Unknown	41	23.6	14.5	1,927	10.3	12.7	43	19.4	15.0	2,690	10.0	13.8	0.0
<b>Total</b>	<b>174</b>	<b>100.0</b>	<b>100.0</b>	<b>18,698</b>	<b>100.0</b>	<b>100.0</b>	<b>222</b>	<b>100.0</b>	<b>100.0</b>	<b>26,870</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	24	14.9	7.8	1,401	7.4	4.0	6	4.1	5.7	328	2.0	3.2	21.6
Moderate	36	22.4	16.8	2,977	15.8	11.1	27	18.5	16.8	2,457	14.6	12.4	16.9
Middle	29	18.0	22.1	2,547	13.5	18.8	41	28.1	23.1	3,950	23.5	20.1	21.6
Upper	59	36.6	40.4	9,572	50.8	50.9	65	44.5	42.9	9,385	55.9	51.9	39.9
Unknown	13	8.1	12.9	2,353	12.5	15.1	7	4.8	11.5	670	4.0	12.4	0.0
<b>Total</b>	<b>161</b>	<b>100.0</b>	<b>100.0</b>	<b>18,850</b>	<b>100.0</b>	<b>100.0</b>	<b>146</b>	<b>100.0</b>	<b>100.0</b>	<b>16,790</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	8	17.4	12.2	262	11.5	8.6	8	13.1	9.8	336	12.1	7.1	21.6
Moderate	12	26.1	20.6	620	27.1	18.9	15	24.6	14.9	518	18.6	11.9	16.9
Middle	7	15.2	26.0	320	14.0	23.5	17	27.9	26.1	648	23.3	27.4	21.6
Upper	18	39.1	38.6	1,054	46.1	45.9	20	32.8	47.0	1,201	43.2	50.6	39.9
Unknown	1	2.2	2.6	30	1.3	3.1	1	1.6	2.2	80	2.9	3.0	0.0
<b>Total</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>2,286</b>	<b>100.0</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>2,783</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	61	14.3	10.0	4,020	9.1	6.1	31	6.9	7.0	2,461	5.1	4.3	21.6
Moderate	91	21.3	20.0	8,375	19.0	16.1	92	20.4	19.6	8,490	17.6	15.6	16.9
Middle	68	15.9	20.9	7,259	16.5	20.2	114	25.2	23.1	11,789	24.4	21.4	21.6
Upper	106	24.8	30.3	15,870	36.0	40.3	141	31.2	35.8	20,263	42.0	44.6	39.9
Unknown	101	23.7	18.8	8,501	19.3	17.3	74	16.4	14.6	5,231	10.8	14.1	0.0
<b>Total</b>	<b>427</b>	<b>100.0</b>	<b>100.0</b>	<b>44,025</b>	<b>100.0</b>	<b>100.0</b>	<b>452</b>	<b>100.0</b>	<b>100.0</b>	<b>48,234</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 13780 (Binghamton, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	148	65.8	41.0	5,199	25.9	27.6	90.0
<b>Over \$1 Million</b>	76	33.8		14,736	73.5		8.8
<b>Revenue Unknown</b>	1	0.4		110	0.5		1.2
<b>Total</b>	225	100.0		20,045	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	184	81.8	94.5	4,375	21.8	41.8	
<b>\$100,001 - \$250,000</b>	19	8.4	3.4	3,383	16.9	19.5	
<b>\$250,001 - \$1 Million</b>	22	9.8	2.1	12,287	61.3	38.7	
<b>Total</b>	225	100.0	100.0	20,045	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	139	93.9		2,625	50.5		
<b>\$100,001 - \$250,000</b>	5	3.4		769	14.8		
<b>\$250,001 - \$1 Million</b>	4	2.7		1,805	34.7		
<b>Total</b>	148	100.0		5,199	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 13780 (Binghamton, NY)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	329	42.3	34.7	17,992	23.3	22.5	221	34.9	43.1	11,425	23.2	22.8	89.9
<b>Over \$1 Million</b>	168	21.6		34,857	45.2		111	17.5		21,471	43.6		8.7
<b>Revenue Unknown</b>	280	36.0		24,271	31.5		302	47.6		16,318	33.2		1.4
<b>Total</b>	777	100.0		77,120	100.0		634	100.0		49,214	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	555	71.4	86.0	17,672	22.9	30.4	496	78.2	91.0	14,260	29.0	37.4	
<b>\$100,001 - \$250,000</b>	139	17.9	8.4	21,209	27.5	22.3	95	15.0	5.7	14,807	30.1	23.4	
<b>\$250,001 - \$1 Million</b>	83	10.7	5.7	38,239	49.6	47.2	43	6.8	3.2	20,147	40.9	39.1	
<b>Total</b>	777	100.0	100.0	77,120	100.0	100.0	634	100.0	100.0	49,214	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	293	89.1		8,515	47.3		195	88.2		5,406	47.3		
<b>\$100,001 - \$250,000</b>	23	7.0		3,544	19.7		20	9.0		3,044	26.6		
<b>\$250,001 - \$1 Million</b>	13	4.0		5,933	33.0		6	2.7		2,975	26.0		
<b>Total</b>	329	100.0		17,992	100.0		221	100.0		11,425	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 21300 (Elmira, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	5.1	0	0.0	2.5	4.7
Moderate	0	0.0	10.7	0	0.0	7.0	8.5
Middle	7	46.7	52.1	1,219	60.6	48.3	56.3
Upper	8	53.3	32.1	792	39.4	42.2	30.6
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	
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>2,011</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	1	12.5	3.0	83	13.1	1.8	4.7
Moderate	1	12.5	9.0	78	12.3	5.5	8.5
Middle	3	37.5	50.6	321	50.7	46.6	56.3
Upper	3	37.5	37.4	151	23.9	46.1	30.6
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	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>633</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	25.0	4.3	23	9.8	3.1	4.7
Moderate	0	0.0	8.2	0	0.0	4.9	8.5
Middle	1	25.0	52.2	12	5.1	51.6	56.3
Upper	2	50.0	35.3	200	85.1	40.4	30.6
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	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>235</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	22.2	0	0.0	1.4	34.4
Moderate	0	0.0	0.0	0	0.0	0.0	15.4
Middle	0	0.0	77.8	0	0.0	98.6	40.0
Upper	0	0.0	0.0	0	0.0	0.0	10.2
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	4	12.1	4.6	293	8.9	2.4	4.7
Moderate	1	3.0	9.5	78	2.4	6.0	8.5
Middle	15	45.5	52.6	1,790	54.2	51.8	56.3
Upper	13	39.4	33.3	1,143	34.6	39.8	30.6
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	
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>3,304</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 21300 (Elmira, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	5.5	0	0.0	2.7	1	4.3	5.8	56	2.1	2.6	4.7
Moderate	4	14.3	8.9	201	7.5	6.1	2	8.7	11.2	82	3.0	8.0	8.5
Middle	15	53.6	54.3	1,318	49.3	50.9	12	52.2	51.5	1,343	49.7	48.3	56.3
Upper	9	32.1	31.3	1,152	43.1	40.4	8	34.8	31.5	1,222	45.2	41.1	30.6
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	
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>2,671</b>	<b>100.0</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>2,703</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	1.6	0	0.0	0.7	0	0.0	2.4	0	0.0	2.2	4.7
Moderate	1	8.3	6.6	70	4.5	3.8	0	0.0	6.7	0	0.0	4.9	8.5
Middle	5	41.7	48.4	273	17.7	44.2	5	33.3	50.2	386	22.0	43.7	56.3
Upper	6	50.0	43.3	1,200	77.8	51.3	10	66.7	40.7	1,372	78.0	49.2	30.6
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	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>1,543</b>	<b>100.0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>1,758</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.0	0	0.0	3.9	0	0.0	5.5	0	0.0	4.3	4.7
Moderate	0	0.0	7.9	0	0.0	6.6	1	100.0	9.1	50	100.0	7.1	8.5
Middle	0	0.0	51.4	0	0.0	55.0	0	0.0	46.3	0	0.0	41.6	56.3
Upper	1	100.0	35.7	56	100.0	34.5	0	0.0	39.0	0	0.0	47.0	30.6
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	27.3	0	0.0	25.3	0	0.0	29.4	0	0.0	3.6	34.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	15.4
Middle	0	0.0	45.5	0	0.0	71.1	1	100.0	58.8	7,425	100.0	38.2	40.0
Upper	0	0.0	27.3	0	0.0	3.6	0	0.0	11.8	0	0.0	58.2	10.2
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>7,425</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	1	1.9	3.8	122	2.3	3.3	1	2.3	4.6	56	0.5	2.6	4.7
Moderate	5	9.6	8.0	271	5.0	4.8	3	7.0	9.3	132	1.1	6.3	8.5
Middle	30	57.7	51.8	2,614	48.3	49.5	21	48.8	50.7	9,316	77.0	45.6	56.3
Upper	16	30.8	36.4	2,408	44.5	42.4	18	41.9	35.3	2,594	21.4	45.5	30.6
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	
<b>Total</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>5,415</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>12,098</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 21300 (Elmira, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	1	3.3	18.2	25	1.0	19.8	19.4
Moderate	4	13.3	12.0	195	7.7	21.4	12.1
Middle	16	53.3	40.1	1,193	46.8	27.6	43.1
Upper	9	30.0	28.7	1,136	44.6	30.8	25.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.4	
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>2,549</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 21300 (Elmira, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	6	15.8	20.3	557	18.8	28.4	9	33.3	17.8	696	35.5	21.9	19.4
Moderate	4	10.5	14.4	194	6.6	19.0	0	0.0	13.4	0	0.0	19.1	12.0
Middle	19	50.0	38.5	427	14.4	27.9	11	40.7	41.1	598	30.5	33.4	42.5
Upper	9	23.7	26.7	1,778	60.1	24.5	7	25.9	27.7	668	34.0	25.6	26.0
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	0.2	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	
<b>Total</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>2,956</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>1,962</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 21300 (Elmira, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	6.7	15.3	62	3.1	8.6	22.9
<b>Moderate</b>	5	33.3	27.2	531	26.4	22.1	16.0
<b>Middle</b>	2	13.3	22.7	122	6.1	22.7	21.0
<b>Upper</b>	4	26.7	24.4	975	48.5	36.5	40.0
<b>Unknown</b>	3	20.0	10.4	321	16.0	10.1	0.0
<b>Total</b>	15	100.0	100.0	2,011	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	4	50.0	12.4	219	34.6	7.3	22.9
<b>Moderate</b>	1	12.5	20.2	83	13.1	13.7	16.0
<b>Middle</b>	0	0.0	21.0	0	0.0	17.8	21.0
<b>Upper</b>	3	37.5	29.4	331	52.3	36.9	40.0
<b>Unknown</b>	0	0.0	17.0	0	0.0	24.3	0.0
<b>Total</b>	8	100.0	100.0	633	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	7.6	0	0.0	5.9	22.9
<b>Moderate</b>	2	50.0	24.5	112	47.7	24.9	16.0
<b>Middle</b>	1	25.0	24.5	23	9.8	19.4	21.0
<b>Upper</b>	0	0.0	39.1	0	0.0	45.5	40.0
<b>Unknown</b>	1	25.0	4.3	100	42.6	4.3	0.0
<b>Total</b>	4	100.0	100.0	235	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	5	15.2	13.2	281	8.5	8.1	22.9
<b>Moderate</b>	8	24.2	24.0	726	22.0	19.6	16.0
<b>Middle</b>	3	9.1	22.4	145	4.4	21.0	21.0
<b>Upper</b>	7	21.2	27.6	1,306	39.5	36.7	40.0
<b>Unknown</b>	10	30.3	12.8	846	25.6	14.6	0.0
<b>Total</b>	33	100.0	100.0	3,304	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 21300 (Elmira, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	10.7	12.4	219	8.2	7.6	2	8.7	8.0	135	5.0	4.5	22.9
Moderate	7	25.0	25.9	860	32.2	21.6	8	34.8	21.5	1,024	37.9	15.9	16.0
Middle	7	25.0	24.9	890	33.3	25.1	4	17.4	23.5	565	20.9	23.4	21.0
Upper	2	7.1	22.6	508	19.0	33.5	4	17.4	28.8	837	31.0	39.9	40.0
Unknown	9	32.1	14.2	194	7.3	12.2	5	21.7	18.2	142	5.3	16.4	0.0
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>2,671</b>	<b>100.0</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>2,703</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	8.3	4.1	70	4.5	1.7	0	0.0	6.6	0	0.0	3.0	22.9
Moderate	3	25.0	12.7	144	9.3	7.8	4	26.7	14.6	367	20.9	9.7	16.0
Middle	1	8.3	23.7	125	8.1	19.4	5	33.3	24.6	480	27.3	19.5	21.0
Upper	7	58.3	43.1	1,204	78.0	53.0	5	33.3	42.8	705	40.1	52.5	40.0
Unknown	0	0.0	16.4	0	0.0	18.1	1	6.7	11.4	206	11.7	15.3	0.0
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>1,543</b>	<b>100.0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>1,758</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.9	0	0.0	4.2	0	0.0	7.3	0	0.0	5.6	22.9
Moderate	1	100.0	17.9	56	100.0	15.4	1	100.0	22.6	50	100.0	18.5	16.0
Middle	0	0.0	34.3	0	0.0	34.3	0	0.0	29.3	0	0.0	23.3	21.0
Upper	0	0.0	41.4	0	0.0	39.7	0	0.0	37.8	0	0.0	49.9	40.0
Unknown	0	0.0	3.6	0	0.0	6.3	0	0.0	3.0	0	0.0	2.7	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	4	7.7	7.9	289	5.3	4.6	2	4.8	7.4	135	2.9	4.0	22.9
Moderate	11	21.2	18.3	1,060	19.6	14.3	13	31.0	18.5	1,441	30.8	13.5	16.0
Middle	8	15.4	24.3	1,015	18.7	22.1	9	21.4	24.1	1,045	22.4	21.8	21.0
Upper	9	17.3	32.4	1,712	31.6	42.1	9	21.4	34.8	1,542	33.0	44.6	40.0
Unknown	20	38.5	17.0	1,339	24.7	16.9	9	21.4	15.2	510	10.9	16.2	0.0
<b>Total</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>5,415</b>	<b>100.0</b>	<b>100.0</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>4,673</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 21300 (Elmira, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	22	73.3	37.2	1,744	68.4	29.1	87.9
Over \$1 Million	7	23.3		552	21.7		10.4
Revenue Unknown	1	3.3		253	9.9		1.7
<b>Total</b>	<b>30</b>	<b>100.0</b>		<b>2,549</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	23	76.7	90.5	797	31.3	30.5	
\$100,001 - \$250,000	4	13.3	5.1	594	23.3	19.8	
\$250,001 - \$1 Million	3	10.0	4.4	1,158	45.4	49.7	
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>2,549</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	17	77.3		517	29.6		
\$100,001 - \$250,000	4	18.2		594	34.1		
\$250,001 - \$1 Million	1	4.5		633	36.3		
<b>Total</b>	<b>22</b>	<b>100.0</b>		<b>1,744</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 21300 (Elmira, NY)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	18	47.4	33.7	685	23.2	16.8	10	37.0	42.9	432	22.0	18.8	88.3
Over \$1 Million	10	26.3		1,434	48.5		7	25.9		670	34.1		10.1
Revenue Unknown	10	26.3		837	28.3		10	37.0		860	43.8		1.6
<b>Total</b>	<b>38</b>	<b>100.0</b>		<b>2,956</b>	<b>100.0</b>		<b>27</b>	<b>100.0</b>		<b>1,962</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	30	78.9	82.2	836	28.3	22.0	22	81.5	88.4	1,044	53.2	30.1	
\$100,001 - \$250,000	5	13.2	9.5	858	29.0	21.1	4	14.8	6.4	634	32.3	21.8	
\$250,001 - \$1 Million	3	7.9	8.3	1,262	42.7	56.9	1	3.7	5.2	284	14.5	48.0	
<b>Total</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>2,956</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>1,962</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	17	94.4		352	51.4		10	100.0		432	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	1	5.6		333	48.6		0	0.0		0	0.0		
<b>Total</b>	<b>18</b>	<b>100.0</b>		<b>685</b>	<b>100.0</b>		<b>10</b>	<b>100.0</b>		<b>432</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 27060 (Ithaca, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	6.1	10.6	328	5.0	8.3	12.2
Middle	24	72.7	68.1	4,848	73.6	63.4	70.6
Upper	7	21.2	20.6	1,415	21.5	26.7	17.0
Unknown	0	0.0	0.7	0	0.0	1.7	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>6,591</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	3.8	13.3	288	5.7	11.2	12.2
Middle	22	84.6	70.0	3,798	75.4	64.5	70.6
Upper	2	7.7	15.1	548	10.9	20.9	17.0
Unknown	1	3.8	1.6	402	8.0	3.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>5,036</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	12.9	0	0.0	10.8	12.2
Middle	3	75.0	70.6	275	64.7	61.7	70.6
Upper	1	25.0	16.5	150	35.3	27.5	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>425</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.1	0	0.0	0.1	11.8
Middle	0	0.0	35.7	0	0.0	6.9	34.8
Upper	2	100.0	39.3	5,047	100.0	69.9	37.4
Unknown	0	0.0	17.9	0	0.0	23.1	16.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>5,047</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	4.5	11.5	616	3.6	4.6	12.2
Middle	50	75.8	68.1	9,031	52.5	35.1	70.6
Upper	12	18.2	19.2	7,160	41.6	47.6	17.0
Unknown	1	1.5	1.2	402	2.3	12.6	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>17,209</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 27060 (Ithaca, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	11.8	9.8	950	8.8	8.5	5	9.1	11.6	1,166	8.9	10.4	12.2
Middle	36	70.6	67.2	7,096	65.9	61.2	39	70.9	68.2	8,393	63.7	62.2	70.6
Upper	9	17.6	22.7	2,716	25.2	30.0	11	20.0	19.4	3,608	27.4	26.4	17.0
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.7	0	0.0	1.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>10,762</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>13,167</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	12.0	13.2	396	6.1	9.5	3	9.1	9.2	461	7.0	8.5	12.2
Middle	16	64.0	63.0	4,998	76.9	58.4	25	75.8	70.6	5,202	78.6	66.1	70.6
Upper	6	24.0	22.8	1,108	17.0	27.5	5	15.2	19.2	952	14.4	23.1	17.0
Unknown	0	0.0	1.0	0	0.0	4.6	0	0.0	0.9	0	0.0	2.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>6,502</b>	<b>100.0</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>6,615</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	12.3	0	0.0	15.0	1	16.7	10.0	50	9.4	5.7	12.2
Middle	1	100.0	78.9	36	100.0	69.9	4	66.7	71.0	232	43.6	72.4	70.6
Upper	0	0.0	8.8	0	0.0	15.1	1	16.7	19.0	250	47.0	21.9	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>532</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	12.0	0	0.0	5.2	0	0.0	16.1	0	0.0	3.7	11.8
Middle	0	0.0	32.0	0	0.0	6.7	2	40.0	25.8	11,355	23.4	18.8	34.8
Upper	0	0.0	16.0	0	0.0	20.6	3	60.0	29.0	37,256	76.6	53.7	37.4
Unknown	1	100.0	40.0	4,300	100.0	67.6	0	0.0	29.0	0	0.0	23.7	16.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,300</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>48,611</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	10	11.6	11.3	1,589	7.1	8.4	9	8.8	10.9	1,677	2.4	8.0	12.2
Middle	60	69.8	65.5	12,824	56.9	52.7	73	71.6	68.6	25,545	36.9	50.4	70.6
Upper	15	17.4	22.1	3,824	17.0	27.4	20	19.6	19.4	42,066	60.7	33.5	17.0
Unknown	1	1.2	1.1	4,300	19.1	11.6	0	0.0	1.1	0	0.0	8.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>86</b>	<b>100.0</b>	<b>100.0</b>	<b>22,537</b>	<b>100.0</b>	<b>100.0</b>	<b>102</b>	<b>100.0</b>	<b>100.0</b>	<b>69,288</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 27060 (Ithaca, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	16.9	16.7	538	9.8	17.2	16.0
Middle	15	25.4	50.1	1,683	30.8	45.0	50.0
Upper	32	54.2	29.0	3,101	56.8	30.1	31.5
Unknown	2	3.4	3.1	142	2.6	7.4	2.5
Tract-Unk	0	0.0	1.1	0	0.0	0.3	
<b>Total</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>5,464</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 27060 (Ithaca, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	11.7	16.4	2,025	24.5	22.4	15	11.4	16.0	1,253	16.3	18.0	16.1
Middle	43	31.4	47.9	2,206	26.7	35.9	44	33.3	49.5	2,546	33.0	41.0	50.2
Upper	69	50.4	32.7	3,139	38.0	36.6	64	48.5	31.2	3,598	46.7	37.1	31.3
Unknown	9	6.6	2.8	887	10.7	5.0	9	6.8	3.1	311	4.0	3.9	2.4
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	
<b>Total</b>	<b>137</b>	<b>100.0</b>	<b>100.0</b>	<b>8,257</b>	<b>100.0</b>	<b>100.0</b>	<b>132</b>	<b>100.0</b>	<b>100.0</b>	<b>7,708</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 27060 (Ithaca, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	3	9.1	4.8	462	7.0	2.5	21.0
<b>Moderate</b>	13	39.4	22.0	1,728	26.2	14.6	16.7
<b>Middle</b>	8	24.2	24.6	1,951	29.6	22.2	21.2
<b>Upper</b>	8	24.2	41.8	2,446	37.1	53.1	41.0
<b>Unknown</b>	1	3.0	6.8	4	0.1	7.5	0.0
<b>Total</b>	33	100.0	100.0	6,591	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	1	3.8	8.9	100	2.0	5.1	21.0
<b>Moderate</b>	5	19.2	18.9	520	10.3	14.2	16.7
<b>Middle</b>	4	15.4	25.3	788	15.6	21.5	21.2
<b>Upper</b>	16	61.5	39.1	3,628	72.0	48.3	41.0
<b>Unknown</b>	0	0.0	7.8	0	0.0	10.9	0.0
<b>Total</b>	26	100.0	100.0	5,036	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	4.7	0	0.0	4.2	21.0
<b>Moderate</b>	0	0.0	17.6	0	0.0	12.9	16.7
<b>Middle</b>	0	0.0	25.9	0	0.0	19.4	21.2
<b>Upper</b>	4	100.0	49.4	425	100.0	55.6	41.0
<b>Unknown</b>	0	0.0	2.4	0	0.0	7.9	0.0
<b>Total</b>	4	100.0	100.0	425	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	4	6.3	6.4	562	4.6	3.4	21.0
<b>Moderate</b>	18	28.1	20.2	2,248	18.5	14.4	16.7
<b>Middle</b>	12	18.8	25.5	2,739	22.5	22.4	21.2
<b>Upper</b>	28	43.8	40.8	6,499	53.4	51.2	41.0
<b>Unknown</b>	2	3.1	7.1	114	0.9	8.6	0.0
<b>Total</b>	64	100.0	100.0	12,162	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 27060 (Ithaca, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	5.9	4.4	310	2.9	2.2	4	7.3	8.5	524	4.0	4.2	21.0
Moderate	11	21.6	19.8	1,919	17.8	13.7	15	27.3	20.0	3,257	24.7	14.0	16.7
Middle	11	21.6	24.5	2,180	20.3	22.1	9	16.4	20.9	2,039	15.5	19.4	21.2
Upper	16	31.4	44.6	5,505	51.2	57.2	18	32.7	43.5	5,029	38.2	55.2	41.0
Unknown	10	19.6	6.6	848	7.9	4.8	9	16.4	7.0	2,318	17.6	7.2	0.0
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>10,762</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>13,167</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	5.6	0	0.0	2.5	1	3.0	6.6	40	0.6	3.6	21.0
Moderate	8	32.0	18.2	1,256	19.3	12.0	9	27.3	18.1	1,201	18.2	13.0	16.7
Middle	6	24.0	21.0	886	13.6	16.6	12	36.4	27.1	2,560	38.7	23.3	21.2
Upper	11	44.0	47.2	4,360	67.1	56.9	10	30.3	42.5	2,647	40.0	51.9	41.0
Unknown	0	0.0	8.0	0	0.0	12.0	1	3.0	5.6	167	2.5	8.1	0.0
<b>Total</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>6,502</b>	<b>100.0</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>6,615</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.8	0	0.0	2.5	0	0.0	5.0	0	0.0	3.7	21.0
Moderate	1	100.0	15.8	36	100.0	9.3	0	0.0	18.0	0	0.0	14.2	16.7
Middle	0	0.0	24.6	0	0.0	14.5	2	33.3	25.0	144	27.1	15.7	21.2
Upper	0	0.0	54.4	0	0.0	65.6	4	66.7	50.0	388	72.9	57.7	41.0
Unknown	0	0.0	3.5	0	0.0	8.0	0	0.0	2.0	0	0.0	8.7	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>532</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	3	3.5	4.9	310	1.7	2.3	5	5.2	7.4	564	2.7	3.9	21.0
Moderate	20	23.5	18.2	3,211	17.6	12.7	24	24.7	19.0	4,458	21.6	13.5	16.7
Middle	17	20.0	22.1	3,066	16.8	19.2	23	23.7	24.0	4,743	22.9	21.0	21.2
Upper	27	31.8	45.3	9,865	54.1	56.8	32	33.0	43.2	8,064	39.0	53.9	41.0
Unknown	18	21.2	9.5	1,785	9.8	9.0	13	13.4	6.4	2,848	13.8	7.6	0.0
<b>Total</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>18,237</b>	<b>100.0</b>	<b>100.0</b>	<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>20,677</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 27060 (Ithaca, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
\$1 Million or Less	43	72.9	45.6	2,958	54.1	38.3	90.9
Over \$1 Million	14	23.7		2,219	40.6		8.0
Revenue Unknown	2	3.4		287	5.3		1.1
<b>Total</b>	<b>59</b>	<b>100.0</b>		<b>5,464</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	49	83.1	91.6	1,336	24.5	30.8	
\$100,001 - \$250,000	3	5.1	3.9	520	9.5	15.3	
\$250,001 - \$1 Million	7	11.9	4.6	3,608	66.0	53.9	
<b>Total</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>5,464</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	39	90.7		835	28.2		
\$100,001 - \$250,000	1	2.3		140	4.7		
\$250,001 - \$1 Million	3	7.0		1,983	67.0		
<b>Total</b>	<b>43</b>	<b>100.0</b>		<b>2,958</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 27060 (Ithaca, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>													
\$1 Million or Less	74	54.0	33.7	1,991	24.1	27.0	53	40.2	53.8	1,958	25.4	55.0	91.3
Over \$1 Million	22	16.1		3,132	37.9		13	9.8		1,570	20.4		7.6
Revenue Unknown	41	29.9		3,134	38.0		66	50.0		4,180	54.2		1.2
<b>Total</b>	<b>137</b>	<b>100.0</b>		<b>8,257</b>	<b>100.0</b>		<b>132</b>	<b>100.0</b>		<b>7,708</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	117	85.4	86.6	3,374	40.9	32.1	109	82.6	89.3	2,868	37.2	30.8	
\$100,001 - \$250,000	13	9.5	7.8	1,826	22.1	21.9	18	13.6	6.3	2,845	36.9	22.6	
\$250,001 - \$1 Million	7	5.1	5.6	3,057	37.0	46.0	5	3.8	4.4	1,995	25.9	46.5	
<b>Total</b>	<b>137</b>	<b>100.0</b>	<b>100.0</b>	<b>8,257</b>	<b>100.0</b>	<b>100.0</b>	<b>132</b>	<b>100.0</b>	<b>100.0</b>	<b>7,708</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	72	97.3		1,739	87.3		49	92.5		1,213	62.0		
\$100,001 - \$250,000	2	2.7		252	12.7		3	5.7		457	23.3		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	1.9		288	14.7		
<b>Total</b>	<b>74</b>	<b>100.0</b>		<b>1,991</b>	<b>100.0</b>		<b>53</b>	<b>100.0</b>		<b>1,958</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 28740 (Kingston, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	1.6	0	0.0	1.2	1.8
Moderate	0	0.0	6.9	0	0.0	5.7	7.1
Middle	30	73.2	60.0	4,791	72.4	57.6	59.0
Upper	11	26.8	31.5	1,830	27.6	35.5	32.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>6,621</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	1	2.0	1.6	60	0.9	1.1	1.8
Moderate	2	4.1	5.7	525	8.0	3.9	7.1
Middle	26	53.1	56.9	3,395	51.5	53.7	59.0
Upper	20	40.8	35.8	2,609	39.6	41.3	32.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>6,589</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.8	0	0.0	4.0	1.8
Moderate	1	5.0	4.0	30	2.7	2.0	7.1
Middle	10	50.0	59.4	488	44.0	54.7	59.0
Upper	9	45.0	34.9	590	53.2	39.3	32.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>1,108</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	10.7	0	0.0	1.6	6.2
Moderate	0	0.0	28.6	0	0.0	16.8	18.3
Middle	0	0.0	53.6	0	0.0	79.5	63.2
Upper	0	0.0	7.1	0	0.0	2.1	12.4
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	1	0.8	1.7	60	0.4	1.3	1.8
Moderate	4	3.3	6.5	666	4.0	5.8	7.1
Middle	70	57.9	58.1	9,471	56.6	57.6	59.0
Upper	46	38.0	33.6	6,533	39.0	35.3	32.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>121</b>	<b>100.0</b>	<b>100.0</b>	<b>16,730</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 28740 (Kingston, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	2.5	2.0	256	1.9	1.6	5	4.5	2.1	946	5.1	1.7	1.8
Moderate	10	12.5	8.1	1,640	12.2	5.4	14	12.7	10.2	2,085	11.2	7.2	7.1
Middle	44	55.0	57.6	6,153	45.8	54.9	79	71.8	56.5	12,915	69.4	54.9	59.0
Upper	24	30.0	32.2	5,372	40.0	38.1	12	10.9	31.2	2,667	14.3	36.3	32.0
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	
<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>13,421</b>	<b>100.0</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>18,613</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	1.6	1.4	100	1.0	1.1	0	0.0	1.8	0	0.0	1.4	1.8
Moderate	5	8.1	4.0	576	5.9	2.7	7	8.5	6.6	1,187	7.5	4.6	7.1
Middle	32	51.6	53.8	4,983	51.4	51.2	49	59.8	56.5	9,155	57.9	55.2	59.0
Upper	24	38.7	40.8	4,028	41.6	45.0	26	31.7	35.2	5,478	34.6	38.8	32.0
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	
<b>Total</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>9,687</b>	<b>100.0</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>	<b>100.0</b>	<b>15,820</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.4	0	0.0	2.0	0	0.0	1.4	0	0.0	1.3	1.8
Moderate	0	0.0	5.7	0	0.0	5.0	1	3.7	3.3	150	5.5	2.6	7.1
Middle	17	73.9	57.5	794	60.7	51.1	17	63.0	65.7	1,545	56.6	63.4	59.0
Upper	6	26.1	35.4	515	39.3	41.9	9	33.3	29.5	1,034	37.9	32.7	32.0
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	
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>1,309</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>2,729</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	12.0	0	0.0	11.7	
Moderate	1	100.0	13.8	4,000	100.0	12.8	1	100.0	16.0	420	100.0	3.7	18.3
Middle	0	0.0	65.5	0	0.0	63.6	0	0.0	62.0	0	0.0	78.0	63.2
Upper	0	0.0	20.7	0	0.0	23.6	0	0.0	10.0	0	0.0	6.5	12.4
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,000</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>420</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	4	2.2	1.8	456	1.4	1.4	6	2.6	2.0	1,052	2.7	2.5	
Moderate	17	9.1	6.0	6,324	20.1	4.4	23	10.0	8.0	3,842	9.8	5.7	7.1
Middle	106	57.0	55.9	14,211	45.1	53.4	150	65.2	57.0	24,263	61.6	57.1	59.0
Upper	59	31.7	36.3	10,525	33.4	40.8	51	22.2	33.0	10,228	26.0	34.7	32.0
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	
<b>Total</b>	<b>186</b>	<b>100.0</b>	<b>100.0</b>	<b>31,516</b>	<b>100.0</b>	<b>100.0</b>	<b>230</b>	<b>100.0</b>	<b>100.0</b>	<b>39,385</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 28740 (Kingston, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	1.5	0	0.0	1.2	2.3
Moderate	14	8.8	7.5	721	7.3	7.7	8.2
Middle	94	59.1	56.4	5,726	58.1	60.2	57.7
Upper	51	32.1	32.1	3,412	34.6	29.6	31.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.6	0	0.0	1.3	
<b>Total</b>	<b>159</b>	<b>100.0</b>	<b>100.0</b>	<b>9,859</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 28740 (Kingston, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	2	0.5	1.3	128	0.4	0.6	3	1.0	1.8	169	0.9	1.1	2.3
Moderate	38	9.5	7.9	4,268	14.5	11.1	38	12.5	7.9	2,550	13.0	9.7	8.0
Middle	230	57.8	56.2	17,031	58.0	59.4	170	55.7	56.9	9,922	50.7	58.1	57.5
Upper	128	32.2	33.9	7,931	27.0	28.5	94	30.8	32.2	6,932	35.4	30.9	32.2
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	0.6	0	0.0	0.4	0	0.0	1.1	0	0.0	0.2	
<b>Total</b>	<b>398</b>	<b>100.0</b>	<b>100.0</b>	<b>29,358</b>	<b>100.0</b>	<b>100.0</b>	<b>305</b>	<b>100.0</b>	<b>100.0</b>	<b>19,573</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 28740 (Kingston, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	2	4.9	3.9	272	4.1	1.9	21.9
<b>Moderate</b>	12	29.3	17.7	1,935	29.2	12.2	16.9
<b>Middle</b>	5	12.2	24.4	610	9.2	20.4	20.1
<b>Upper</b>	10	24.4	46.7	2,994	45.2	58.6	41.0
<b>Unknown</b>	12	29.3	7.2	810	12.2	6.9	0.0
<b>Total</b>	41	100.0	100.0	6,621	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	6	12.2	6.3	522	7.9	3.5	21.9
<b>Moderate</b>	9	18.4	17.2	1,006	15.3	12.1	16.9
<b>Middle</b>	11	22.4	23.7	1,452	22.0	18.9	20.1
<b>Upper</b>	23	46.9	44.5	3,609	54.8	55.3	41.0
<b>Unknown</b>	0	0.0	8.2	0	0.0	10.3	0.0
<b>Total</b>	49	100.0	100.0	6,589	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	1	5.0	6.5	30	2.7	5.6	21.9
<b>Moderate</b>	7	35.0	16.5	420	37.9	15.0	16.9
<b>Middle</b>	3	15.0	23.7	140	12.6	19.6	20.1
<b>Upper</b>	9	45.0	51.1	518	46.8	54.7	41.0
<b>Unknown</b>	0	0.0	2.2	0	0.0	5.1	0.0
<b>Total</b>	20	100.0	100.0	1,108	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	9	7.4	4.9	824	4.9	2.5	21.9
<b>Moderate</b>	28	23.1	16.9	3,361	20.1	12.0	16.9
<b>Middle</b>	19	15.7	24.0	2,202	13.2	19.6	20.1
<b>Upper</b>	42	34.7	45.5	7,121	42.6	56.6	41.0
<b>Unknown</b>	23	19.0	8.7	3,222	19.3	9.3	0.0
<b>Total</b>	121	100.0	100.0	16,730	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 28740 (Kingston, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	1	1.3	2.8	60	0.4	1.5	4	3.6	4.1	326	1.8	2.1	21.9
Moderate	21	26.3	14.9	2,776	20.7	9.6	40	36.4	18.8	5,382	28.9	13.0	16.9
Middle	23	28.8	22.7	3,300	24.6	18.8	30	27.3	23.0	5,698	30.6	19.6	20.1
Upper	28	35.0	52.9	6,509	48.5	64.6	25	22.7	47.0	6,180	33.2	58.5	41.0
Unknown	7	8.8	6.6	776	5.8	5.5	11	10.0	7.2	1,027	5.5	6.8	0.0
<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>13,421</b>	<b>100.0</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>18,613</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	6	9.7	3.1	495	5.1	1.9	9	11.0	5.6	1,097	6.9	3.1	21.9
Moderate	12	19.4	12.8	1,314	13.6	8.5	18	22.0	16.2	3,136	19.8	11.3	16.9
Middle	17	27.4	25.4	2,617	27.0	21.0	22	26.8	26.9	4,005	25.3	23.3	20.1
Upper	26	41.9	52.0	5,011	51.7	60.9	31	37.8	44.4	7,267	45.9	54.6	41.0
Unknown	1	1.6	6.7	250	2.6	7.7	2	2.4	7.0	315	2.0	7.7	0.0
<b>Total</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>9,687</b>	<b>100.0</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>	<b>100.0</b>	<b>15,820</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	4	17.4	4.2	295	22.5	4.5	3	11.1	8.9	90	3.3	4.1	21.9
Moderate	4	17.4	13.7	185	14.1	9.3	5	18.5	16.7	315	11.5	12.8	16.9
Middle	6	26.1	30.2	315	24.1	25.8	6	22.2	29.2	480	17.6	22.7	20.1
Upper	8	34.8	49.1	496	37.9	56.4	11	40.7	42.9	1,525	55.9	56.1	41.0
Unknown	1	4.3	2.8	18	1.4	4.0	2	7.4	2.2	319	11.7	4.3	0.0
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>1,309</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>2,729</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	11	5.9	3.0	850	3.1	1.7	16	7.0	5.2	1,513	3.9	2.6	21.9
Moderate	37	20.0	13.5	4,275	15.5	8.9	63	27.5	17.2	8,833	22.7	12.1	16.9
Middle	46	24.9	23.3	6,232	22.6	19.3	58	25.3	25.0	10,183	26.1	21.1	20.1
Upper	62	33.5	50.7	12,016	43.7	61.5	67	29.3	45.2	14,972	38.4	56.7	41.0
Unknown	29	15.7	9.4	4,143	15.1	8.6	25	10.9	7.4	3,464	8.9	7.5	0.0
<b>Total</b>	<b>185</b>	<b>100.0</b>	<b>100.0</b>	<b>27,516</b>	<b>100.0</b>	<b>100.0</b>	<b>229</b>	<b>100.0</b>	<b>100.0</b>	<b>38,965</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 28740 (Kingston, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	107	67.3	41.3	2,850	28.9	36.0	92.5
Over \$1 Million	51	32.1		6,759	68.6		6.1
Revenue Unknown	1	0.6		250	2.5		1.4
<b>Total</b>	<b>159</b>	<b>100.0</b>		<b>9,859</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	140	88.1	96.5	3,334	33.8	54.7	
\$100,001 - \$250,000	9	5.7	2.2	1,900	19.3	15.8	
\$250,001 - \$1 Million	10	6.3	1.3	4,625	46.9	29.5	
<b>Total</b>	<b>159</b>	<b>100.0</b>	<b>100.0</b>	<b>9,859</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	105	98.1		2,025	71.1		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	2	1.9		825	28.9		
<b>Total</b>	<b>107</b>	<b>100.0</b>		<b>2,850</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 28740 (Kingston, NY)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%		%
<b>By Revenue</b>													
\$1 Million or Less	202	50.8	36.3	5,742	19.6	25.0	105	34.4	43.0	4,072	20.8	29.8	92.9
Over \$1 Million	75	18.8		16,883	57.5		62	20.3		10,257	52.4		5.7
Revenue Unknown	121	30.4		6,733	22.9		138	45.2		5,244	26.8		1.4
<b>Total</b>	<b>398</b>	<b>100.0</b>		<b>29,358</b>	<b>100.0</b>		<b>305</b>	<b>100.0</b>		<b>19,573</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	332	83.4	92.4	10,009	34.1	41.5	263	86.2	94.5	7,824	40.0	45.6	
\$100,001 - \$250,000	38	9.5	4.6	6,056	20.6	19.2	27	8.9	3.4	4,138	21.1	17.3	
\$250,001 - \$1 Million	28	7.0	3.0	13,293	45.3	39.3	15	4.9	2.2	7,611	38.9	37.2	
<b>Total</b>	<b>398</b>	<b>100.0</b>	<b>100.0</b>	<b>29,358</b>	<b>100.0</b>	<b>100.0</b>	<b>305</b>	<b>100.0</b>	<b>100.0</b>	<b>19,573</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	197	97.5		4,882	85.0		100	95.2		2,739	67.3		
\$100,001 - \$250,000	4	2.0		608	10.6		3	2.9		408	10.0		
\$250,001 - \$1 Million	1	0.5		252	4.4		2	1.9		925	22.7		
<b>Total</b>	<b>202</b>	<b>100.0</b>		<b>5,742</b>	<b>100.0</b>		<b>105</b>	<b>100.0</b>		<b>4,072</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 39100 (Poughkeeps-Newbg-Middletwn, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	10	4.2	5.0	1,086	2.2	4.9	2.6
Moderate	39	16.4	10.0	6,459	13.2	8.4	10.9
Middle	129	54.2	51.9	26,180	53.4	48.3	53.3
Upper	60	25.2	33.1	15,271	31.2	38.3	33.1
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	
<b>Total</b>	<b>238</b>	<b>100.0</b>	<b>100.0</b>	<b>48,996</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	1.4	10.7	518	1.8	14.2	2.6
Moderate	15	10.2	8.0	2,134	7.4	5.9	10.9
Middle	66	44.9	46.3	12,003	41.6	42.3	53.3
Upper	64	43.5	35.1	14,223	49.3	37.5	33.1
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	
<b>Total</b>	<b>147</b>	<b>100.0</b>	<b>100.0</b>	<b>28,878</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	1.0	4.3	75	1.1	7.3	2.6
Moderate	10	10.3	10.5	454	6.8	10.2	10.9
Middle	57	58.8	49.9	3,462	51.9	45.0	53.3
Upper	29	29.9	35.4	2,678	40.2	37.4	33.1
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	
<b>Total</b>	<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>6,669</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	15.4	0	0.0	13.2	17.0
Moderate	0	0.0	35.9	0	0.0	18.9	23.4
Middle	1	100.0	33.3	4,735	100.0	46.9	48.6
Upper	0	0.0	15.4	0	0.0	21.1	11.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,735</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	13	2.5	6.8	1,679	1.7	8.2	2.6
Moderate	73	14.1	9.4	10,468	10.8	8.1	10.9
Middle	271	52.3	49.9	50,845	52.4	46.2	53.3
Upper	161	31.1	33.9	34,037	35.1	37.5	33.1
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	
<b>Total</b>	<b>518</b>	<b>100.0</b>	<b>100.0</b>	<b>97,029</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 39100 (Poughkeeps-Newbg-Middletwn, 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)	\$%		\$%
<b>Home Purchase Loans</b>													
Low	20	7.0	4.6	2,166	3.8	4.3	13	4.6	4.5	1,688	2.8	4.0	2.6
Moderate	58	20.4	10.6	8,328	14.6	8.5	70	25.0	11.2	12,259	20.2	9.4	10.9
Middle	149	52.5	50.0	29,830	52.1	47.0	147	52.5	50.9	33,732	55.5	48.3	53.3
Upper	57	20.1	34.9	16,908	29.5	40.2	50	17.9	33.3	13,114	21.6	38.3	33.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>284</b>	<b>100.0</b>	<b>100.0</b>	<b>57,232</b>	<b>100.0</b>	<b>100.0</b>	<b>280</b>	<b>100.0</b>	<b>100.0</b>	<b>60,793</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	7	3.3	8.3	1,711	3.8	10.5	6	2.2	6.9	1,251	2.1	8.6	2.6
Moderate	26	12.4	6.5	3,755	8.3	5.0	28	10.3	7.9	4,596	7.7	6.2	10.9
Middle	93	44.5	47.2	17,567	38.6	43.1	154	56.8	49.9	33,642	56.3	46.5	53.3
Upper	83	39.7	38.0	22,468	49.4	41.5	83	30.6	35.3	20,260	33.9	38.7	33.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>209</b>	<b>100.0</b>	<b>100.0</b>	<b>45,501</b>	<b>100.0</b>	<b>100.0</b>	<b>271</b>	<b>100.0</b>	<b>100.0</b>	<b>59,749</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	2.4	4.2	159	2.7	7.2	1	1.0	2.8	225	2.4	5.0	2.6
Moderate	8	9.6	7.0	399	6.7	5.1	15	15.6	7.0	1,603	16.8	6.7	10.9
Middle	38	45.8	51.1	2,257	38.1	46.3	48	50.0	52.8	4,535	47.7	50.4	53.3
Upper	35	42.2	37.7	3,102	52.4	41.4	32	33.3	37.4	3,154	33.1	38.0	33.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>83</b>	<b>100.0</b>	<b>100.0</b>	<b>5,917</b>	<b>100.0</b>	<b>100.0</b>	<b>96</b>	<b>100.0</b>	<b>100.0</b>	<b>9,517</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
Low	1	14.3	23.8	1,800	2.9	28.5	1	20.0	21.6	33,184	43.4		12.7
Moderate	2	28.6	27.7	5,064	8.2	10.4	1	20.0	28.8	990	1.3	16.7	23.4
Middle	4	57.1	38.6	54,915	88.9	41.4	3	60.0	42.4	42,333	55.3	69.1	48.6
Upper	0	0.0	9.9	0	0.0	19.6	0	0.0	7.2	0	0.0	1.6	11.0
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	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>61,779</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>76,507</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
Low	31	4.5	6.4	5,978	3.1	8.8	21	3.1	5.7	36,348	17.0		6.8
Moderate	107	15.7	8.5	19,637	10.3	7.1	119	17.4	9.3	20,350	9.5	8.6	10.9
Middle	346	50.7	48.7	117,419	61.5	44.8	373	54.5	50.6	118,806	55.6	49.2	53.3
Upper	198	29.0	36.3	47,917	25.1	39.4	172	25.1	34.4	38,274	17.9	35.4	33.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>682</b>	<b>100.0</b>	<b>100.0</b>	<b>190,951</b>	<b>100.0</b>	<b>100.0</b>	<b>685</b>	<b>100.0</b>	<b>100.0</b>	<b>213,778</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 39100 (Poughkeeps-Newbg-Middletwn, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	32	8.0	16.6	2,461	7.9	17.7	7.8
Moderate	54	13.5	11.6	2,864	9.2	11.8	14.1
Middle	193	48.1	41.7	18,497	59.6	42.8	50.3
Upper	122	30.4	28.5	7,222	23.3	26.9	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.6	0	0.0	0.8	
<b>Total</b>	<b>401</b>	<b>100.0</b>	<b>100.0</b>	<b>31,044</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 39100 (Poughkeeps-Newbg-Middletwn, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	81	6.6	14.8	6,892	6.4	13.2	100	10.2	15.0	11,943	13.9	14.1	8.0
Moderate	202	16.4	12.3	17,699	16.6	12.6	135	13.8	11.9	9,862	11.5	12.4	14.1
Middle	581	47.2	44.2	49,785	46.6	45.4	449	45.8	43.6	37,738	44.0	44.8	50.0
Upper	366	29.8	28.2	32,563	30.5	28.4	297	30.3	28.9	26,222	30.6	28.6	28.0
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	0.6	0	0.0	0.4	0	0.0	0.7	0	0.0	0.2	
<b>Total</b>	<b>1,230</b>	<b>100.0</b>	<b>100.0</b>	<b>106,939</b>	<b>100.0</b>	<b>100.0</b>	<b>981</b>	<b>100.0</b>	<b>100.0</b>	<b>85,765</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 39100 (Poughkeeps-Newbg-Middletwn, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>					<b>Families by Family Income %</b>	
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>			<b>Agg</b>
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>		<b>%</b>
<b>Home Purchase Loans</b>							
<b>Low</b>	13	5.5	6.0	1,634	3.3	3.6	21.5
<b>Moderate</b>	43	18.1	22.4	6,365	13.0	17.3	16.5
<b>Middle</b>	64	26.9	28.6	14,426	29.4	27.9	20.9
<b>Upper</b>	70	29.4	31.6	23,122	47.2	39.8	41.0
<b>Unknown</b>	48	20.2	11.4	3,449	7.0	11.3	0.0
<b>Total</b>	238	100.0	100.0	48,996	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	10	6.8	6.5	965	3.3	4.1	21.5
<b>Moderate</b>	32	21.8	16.3	4,193	14.5	12.3	16.5
<b>Middle</b>	30	20.4	25.4	4,675	16.2	23.0	20.9
<b>Upper</b>	66	44.9	39.6	15,973	55.3	47.2	41.0
<b>Unknown</b>	9	6.1	12.2	3,072	10.6	13.5	0.0
<b>Total</b>	147	100.0	100.0	28,878	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	12	12.4	7.5	775	11.6	6.4	21.5
<b>Moderate</b>	21	21.6	16.2	951	14.3	12.7	16.5
<b>Middle</b>	28	28.9	26.5	1,637	24.5	22.0	20.9
<b>Upper</b>	34	35.1	46.8	3,110	46.6	52.8	41.0
<b>Unknown</b>	2	2.1	3.1	196	2.9	6.1	0.0
<b>Total</b>	97	100.0	100.0	6,669	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	35	6.8	6.2	3,374	3.7	3.8	21.5
<b>Moderate</b>	96	18.6	19.3	11,509	12.5	15.2	16.5
<b>Middle</b>	122	23.6	26.6	20,738	22.5	25.4	20.9
<b>Upper</b>	170	32.9	35.2	42,205	45.7	42.0	41.0
<b>Unknown</b>	94	18.2	12.6	14,468	15.7	13.7	0.0
<b>Total</b>	517	100.0	100.0	92,294	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 39100 (Poughkeeps-Newbg-Middletwn, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	15	5.3	5.8	1,563	2.7	3.2	17	6.1	5.3	2,039	3.4	2.8	21.5
Moderate	73	25.7	23.0	13,746	24.0	18.2	68	24.3	22.0	14,507	23.9	16.9	16.5
Middle	70	24.6	28.9	18,080	31.6	28.5	82	29.3	28.7	22,093	36.3	27.6	20.9
Upper	47	16.5	32.8	14,322	25.0	41.0	46	16.4	35.0	17,099	28.1	44.0	41.0
Unknown	79	27.8	9.6	9,521	16.6	9.1	67	23.9	9.2	5,055	8.3	8.7	0.0
<b>Total</b>	<b>284</b>	<b>100.0</b>	<b>100.0</b>	<b>57,232</b>	<b>100.0</b>	<b>100.0</b>	<b>280</b>	<b>100.0</b>	<b>100.0</b>	<b>60,793</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	15	7.2	4.3	1,473	3.2	2.7	22	8.1	4.3	2,403	4.0	2.7	21.5
Moderate	49	23.4	15.7	7,506	16.5	12.3	59	21.8	17.2	10,058	16.8	13.3	16.5
Middle	53	25.4	27.1	9,967	21.9	24.4	88	32.5	28.7	19,320	32.3	26.3	20.9
Upper	87	41.6	42.8	25,840	56.8	49.2	97	35.8	40.5	26,174	43.8	47.6	41.0
Unknown	5	2.4	10.2	715	1.6	11.5	5	1.8	9.4	1,794	3.0	10.1	0.0
<b>Total</b>	<b>209</b>	<b>100.0</b>	<b>100.0</b>	<b>45,501</b>	<b>100.0</b>	<b>100.0</b>	<b>271</b>	<b>100.0</b>	<b>100.0</b>	<b>59,749</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	6	7.2	8.0	455	7.7	6.4	5	5.2	5.5	240	2.5	3.6	21.5
Moderate	19	22.9	14.8	1,180	19.9	13.8	27	28.1	16.7	2,796	29.4	14.0	16.5
Middle	21	25.3	25.8	1,111	18.8	21.3	29	30.2	25.0	2,546	26.8	21.3	20.9
Upper	35	42.2	48.3	3,081	52.1	51.2	33	34.4	52.0	3,823	40.2	60.1	41.0
Unknown	2	2.4	3.1	90	1.5	7.3	2	2.1	0.7	112	1.2	1.0	0.0
<b>Total</b>	<b>83</b>	<b>100.0</b>	<b>100.0</b>	<b>5,917</b>	<b>100.0</b>	<b>100.0</b>	<b>96</b>	<b>100.0</b>	<b>100.0</b>	<b>9,517</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	36	5.3	4.9	3,491	2.7	2.9	44	6.5	4.7	4,682	3.4	2.7	21.5
Moderate	141	20.9	18.0	22,432	17.4	14.5	154	22.6	19.0	27,361	19.9	14.9	16.5
Middle	144	21.3	26.6	29,158	22.6	25.4	199	29.3	28.1	43,959	32.0	26.5	20.9
Upper	169	25.0	37.4	43,243	33.5	44.3	176	25.9	38.5	47,096	34.3	45.8	41.0
Unknown	185	27.4	12.9	30,848	23.9	12.9	107	15.7	9.7	14,173	10.3	10.1	0.0
<b>Total</b>	<b>675</b>	<b>100.0</b>	<b>100.0</b>	<b>129,172</b>	<b>100.0</b>	<b>100.0</b>	<b>680</b>	<b>100.0</b>	<b>100.0</b>	<b>137,271</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 39100 (Poughkeeps-Newbg-Middletwn, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	278	69.3	41.3	10,501	33.8	29.9	92.1
Over \$1 Million	118	29.4		18,613	60.0		6.9
Revenue Unknown	5	1.2		1,930	6.2		1.1
<b>Total</b>	<b>401</b>	<b>100.0</b>		<b>31,044</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	347	86.5	95.1	9,774	31.5	46.9	
\$100,001 - \$250,000	21	5.2	3.0	3,974	12.8	17.5	
\$250,001 - \$1 Million	33	8.2	1.9	17,296	55.7	35.6	
<b>Total</b>	<b>401</b>	<b>100.0</b>	<b>100.0</b>	<b>31,044</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	262	94.2		5,498	52.4		
\$100,001 - \$250,000	7	2.5		1,023	9.7		
\$250,001 - \$1 Million	9	3.2		3,980	37.9		
<b>Total</b>	<b>278</b>	<b>100.0</b>		<b>10,501</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 39100 (Poughkeeps-Newbg-Middletwn, NY)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	520	42.3	34.5	26,970	25.2	22.4	405	41.3	41.5	24,871	29.0	25.8	92.4
Over \$1 Million	275	22.4		51,599	48.3		202	20.6		38,091	44.4		6.5
Revenue Unknown	435	35.4		28,370	26.5		374	38.1		22,803	26.6		1.1
<b>Total</b>	<b>1,230</b>	<b>100.0</b>		<b>106,939</b>	<b>100.0</b>		<b>981</b>	<b>100.0</b>		<b>85,765</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	959	78.0	90.2	28,670	26.8	38.7	789	80.4	93.3	24,542	28.6	43.1	
\$100,001 - \$250,000	154	12.5	6.2	24,003	22.4	21.5	101	10.3	4.2	15,869	18.5	19.8	
\$250,001 - \$1 Million	117	9.5	3.6	54,266	50.7	39.8	91	9.3	2.5	45,354	52.9	37.1	
<b>Total</b>	<b>1,230</b>	<b>100.0</b>	<b>100.0</b>	<b>106,939</b>	<b>100.0</b>	<b>100.0</b>	<b>981</b>	<b>100.0</b>	<b>100.0</b>	<b>85,765</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	469	90.2		12,497	46.3		365	90.1		10,443	42.0		
\$100,001 - \$250,000	32	6.2		5,133	19.0		17	4.2		2,617	10.5		
\$250,001 - \$1 Million	19	3.7		9,340	34.6		23	5.7		11,811	47.5		
<b>Total</b>	<b>520</b>	<b>100.0</b>		<b>26,970</b>	<b>100.0</b>		<b>405</b>	<b>100.0</b>		<b>24,871</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 45060 (Syracuse, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	3	1.4	2.1	159	0.5	1.0	3.2
Moderate	16	7.5	9.9	1,279	3.8	6.6	10.3
Middle	95	44.8	46.9	11,486	34.1	40.7	47.3
Upper	97	45.8	41.0	20,549	61.0	51.5	39.0
Unknown	1	0.5	0.2	215	0.6	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>212</b>	<b>100.0</b>	<b>100.0</b>	<b>33,688</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	3	1.1	1.7	125	0.3	1.0	3.2
Moderate	21	7.7	7.9	1,279	3.4	5.0	10.3
Middle	105	38.6	44.5	8,669	22.8	36.5	47.3
Upper	143	52.6	45.8	27,907	73.5	57.2	39.0
Unknown	0	0.0	0.2	0	0.0	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>272</b>	<b>100.0</b>	<b>100.0</b>	<b>37,980</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	0.7	1.3	30	0.3	1.4	3.2
Moderate	5	3.5	6.6	136	1.5	4.3	10.3
Middle	61	43.0	45.8	2,997	32.4	38.8	47.3
Upper	75	52.8	46.3	6,095	65.8	55.5	39.0
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>142</b>	<b>100.0</b>	<b>100.0</b>	<b>9,258</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	2	16.7	23.3	1,792	2.1	4.9	20.5
Moderate	1	8.3	17.4	326	0.4	17.2	21.0
Middle	6	50.0	25.6	72,637	85.6	45.0	31.7
Upper	3	25.0	33.7	10,110	11.9	33.0	20.7
Unknown	0	0.0	0.0	0	0.0	0.0	6.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>84,865</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	10	1.5	2.1	2,129	1.2	1.6	3.2
Moderate	49	7.2	9.2	3,403	2.0	7.8	10.3
Middle	294	42.9	46.3	98,331	57.6	40.6	47.3
Upper	331	48.3	42.1	66,532	39.0	49.8	39.0
Unknown	1	0.1	0.2	215	0.1	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>685</b>	<b>100.0</b>	<b>100.0</b>	<b>170,610</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography														
Assessment Area: MSA 45060 (Syracuse, NY)														
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %	
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%		
<b>Home Purchase Loans</b>														
Low	8	2.9	2.2	800	1.7	1.3	15	5.0	3.3	1,561	3.1	1.9	3.2	
Moderate	33	12.0	10.7	3,247	7.0	7.0	33	11.0	11.7	3,766	7.4	7.9	10.3	
Middle	132	48.2	44.8	18,151	39.2	38.2	145	48.3	46.4	22,251	43.6	40.9	47.3	
Upper	101	36.9	42.1	24,157	52.1	53.2	106	35.3	38.4	23,160	45.4	49.2	39.0	
Unknown	0	0.0	0.2	0	0.0	0.2	1	0.3	0.1	328	0.6	0.2	0.1	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
<b>Total</b>	<b>274</b>	<b>100.0</b>	<b>100.0</b>	<b>46,355</b>	<b>100.0</b>	<b>100.0</b>	<b>300</b>	<b>100.0</b>	<b>100.0</b>	<b>51,066</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
<b>Refinance Loans</b>														
Low	1	0.3	0.7	101	0.2	0.4	7	2.3	1.2	479	1.1	0.7	3.2	
Moderate	11	3.6	5.1	971	1.9	3.0	31	10.1	7.0	2,639	6.0	4.5	10.3	
Middle	115	37.7	40.5	11,967	23.5	33.3	121	39.4	44.2	15,692	35.9	37.9	47.3	
Upper	178	58.4	53.6	37,849	74.4	63.3	148	48.2	47.5	24,866	56.9	56.9	39.0	
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
<b>Total</b>	<b>305</b>	<b>100.0</b>	<b>100.0</b>	<b>50,888</b>	<b>100.0</b>	<b>100.0</b>	<b>307</b>	<b>100.0</b>	<b>100.0</b>	<b>43,676</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
<b>Home Improvement Loans</b>														
Low	0	0.0	2.5	0	0.0	1.9	3	2.5	1.4	120	1.7	1.0	3.2	
Moderate	7	6.7	6.3	247	2.8	3.7	8	6.6	7.3	295	4.1	4.9	10.3	
Middle	37	35.6	45.5	1,385	15.8	37.0	49	40.5	45.1	2,444	34.3	39.2	47.3	
Upper	60	57.7	45.6	7,108	81.3	57.4	61	50.4	46.2	4,262	59.9	54.9	39.0	
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
<b>Total</b>	<b>104</b>	<b>100.0</b>	<b>100.0</b>	<b>8,740</b>	<b>100.0</b>	<b>100.0</b>	<b>121</b>	<b>100.0</b>	<b>100.0</b>	<b>7,121</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>	
Low	2	25.0	24.1	1,010	2.0	8.1	0	0.0	25.6	0	0.0	22.1		20.5
Moderate	1	12.5	20.7	410	0.8	7.4	2	28.6	29.5	702	0.9	10.7		21.0
Middle	4	50.0	29.3	43,175	85.3	53.7	2	28.6	24.4	70,355	89.7	43.0		31.7
Upper	1	12.5	25.9	6,000	11.9	30.8	3	42.9	19.2	7,338	9.4	22.1		20.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.3	0	0.0	2.1		6.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>50,595</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>78,395</b>	<b>100.0</b>	<b>100.0</b>		<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>	
Low	14	1.7	1.7	2,064	1.2	1.5	26	3.4	2.4	2,167	1.2	3.8		3.2
Moderate	64	7.9	8.3	5,636	3.4	5.5	76	9.9	9.4	7,514	4.1	6.9		10.3
Middle	352	43.5	43.6	80,879	48.1	37.7	340	44.3	45.4	112,733	61.5	40.0		47.3
Upper	380	46.9	46.2	79,635	47.3	55.2	325	42.3	42.7	60,508	33.0	48.9		39.0
Unknown	0	0.0	0.2	0	0.0	0.1	1	0.1	0.1	328	0.2	0.4		0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
<b>Total</b>	<b>810</b>	<b>100.0</b>	<b>100.0</b>	<b>168,214</b>	<b>100.0</b>	<b>100.0</b>	<b>768</b>	<b>100.0</b>	<b>100.0</b>	<b>183,250</b>	<b>100.0</b>	<b>100.0</b>		<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 45060 (Syracuse, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	70	11.1	7.5	8,755	11.9	7.4	9.6
Moderate	67	10.6	9.5	6,987	9.5	8.4	10.2
Middle	275	43.7	40.0	37,242	50.4	44.5	38.9
Upper	197	31.3	39.4	17,582	23.8	35.2	38.5
Unknown	21	3.3	2.2	3,270	4.4	4.2	2.7
Tract-Unk	0	0.0	1.2	0	0.0	0.4	
<b>Total</b>	<b>630</b>	<b>100.0</b>	<b>100.0</b>	<b>73,836</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	146	8.2	7.9	22,135	10.3	9.5	101	7.9	7.5	13,781	10.8	9.3	9.6
Moderate	154	8.7	10.0	18,873	8.8	9.4	115	9.0	10.2	15,034	11.8	10.6	10.1
Middle	745	42.0	41.2	93,093	43.5	43.4	504	39.4	41.6	49,161	38.6	43.0	39.4
Upper	665	37.5	38.0	66,797	31.2	32.8	520	40.6	38.2	42,438	33.3	32.4	38.4
Unknown	64	3.6	2.7	13,140	6.1	4.9	40	3.1	2.2	6,970	5.5	4.5	2.4
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>1,774</b>	<b>100.0</b>	<b>100.0</b>	<b>214,038</b>	<b>100.0</b>	<b>100.0</b>	<b>1,280</b>	<b>100.0</b>	<b>100.0</b>	<b>127,384</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 45060 (Syracuse, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	24	11.3	10.4	1,809	5.4	6.0	20.7
<b>Moderate</b>	61	28.8	25.1	6,514	19.3	18.9	16.6
<b>Middle</b>	41	19.3	21.9	5,750	17.1	20.8	20.2
<b>Upper</b>	70	33.0	31.1	17,440	51.8	43.1	42.5
<b>Unknown</b>	16	7.5	11.5	2,175	6.5	11.2	0.0
<b>Total</b>	212	100.0	100.0	33,688	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	41	15.1	10.6	2,309	6.1	5.9	20.7
<b>Moderate</b>	62	22.8	20.6	4,853	12.8	14.7	16.6
<b>Middle</b>	73	26.8	23.2	6,585	17.3	19.9	20.2
<b>Upper</b>	93	34.2	38.4	23,833	62.8	50.4	42.5
<b>Unknown</b>	3	1.1	7.2	400	1.1	9.1	0.0
<b>Total</b>	272	100.0	100.0	37,980	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	15	10.6	8.8	564	6.1	6.6	20.7
<b>Moderate</b>	33	23.2	20.1	1,592	17.2	14.0	16.6
<b>Middle</b>	30	21.1	27.0	1,853	20.0	24.9	20.2
<b>Upper</b>	60	42.3	42.5	5,154	55.7	52.0	42.5
<b>Unknown</b>	4	2.8	1.7	95	1.0	2.4	0.0
<b>Total</b>	142	100.0	100.0	9,258	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	80	11.9	10.3	4,682	5.5	6.1	20.7
<b>Moderate</b>	156	23.2	22.5	12,959	15.1	17.3	16.6
<b>Middle</b>	144	21.4	22.2	14,188	16.5	20.3	20.2
<b>Upper</b>	223	33.1	33.5	46,427	54.1	44.5	42.5
<b>Unknown</b>	70	10.4	11.5	7,489	8.7	11.7	0.0
<b>Total</b>	673	100.0	100.0	85,745	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 45060 (Syracuse, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	22	8.0	7.5	1,740	3.8	4.2	40	13.3	10.2	4,451	8.7	6.0	20.7
Moderate	72	26.3	23.2	8,344	18.0	16.9	90	30.0	24.0	13,604	26.6	18.2	16.6
Middle	61	22.3	23.8	9,525	20.5	22.0	54	18.0	21.7	8,864	17.4	20.6	20.2
Upper	88	32.1	34.5	20,261	43.7	46.3	82	27.3	31.4	21,074	41.3	43.2	42.5
Unknown	31	11.3	11.0	6,485	14.0	10.6	34	11.3	12.7	3,073	6.0	11.9	0.0
<b>Total</b>	<b>274</b>	<b>100.0</b>	<b>100.0</b>	<b>46,355</b>	<b>100.0</b>	<b>100.0</b>	<b>300</b>	<b>100.0</b>	<b>100.0</b>	<b>51,066</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	18	5.9	4.4	1,412	2.8	2.2	28	9.1	7.0	2,331	5.3	3.9	20.7
Moderate	44	14.4	13.3	3,690	7.3	8.4	55	17.9	18.1	5,495	12.6	12.5	16.6
Middle	83	27.2	22.6	9,426	18.5	17.8	84	27.4	24.7	9,461	21.7	20.8	20.2
Upper	149	48.9	50.4	28,289	55.6	60.8	126	41.0	40.5	24,563	56.2	51.9	42.5
Unknown	11	3.6	9.3	8,071	15.9	10.8	14	4.6	9.7	1,826	4.2	10.9	0.0
<b>Total</b>	<b>305</b>	<b>100.0</b>	<b>100.0</b>	<b>50,888</b>	<b>100.0</b>	<b>100.0</b>	<b>307</b>	<b>100.0</b>	<b>100.0</b>	<b>43,676</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	5	4.8	7.0	120	1.4	3.9	12	9.9	7.8	406	5.7	5.0	20.7
Moderate	21	20.2	18.7	1,275	14.6	12.9	23	19.0	19.8	888	12.5	14.0	16.6
Middle	27	26.0	25.4	1,649	18.9	18.7	34	28.1	27.0	1,590	22.3	22.1	20.2
Upper	49	47.1	46.9	5,529	63.3	59.9	48	39.7	43.5	4,085	57.4	56.6	42.5
Unknown	2	1.9	2.1	167	1.9	4.6	4	3.3	1.8	152	2.1	2.1	0.0
<b>Total</b>	<b>104</b>	<b>100.0</b>	<b>100.0</b>	<b>8,740</b>	<b>100.0</b>	<b>100.0</b>	<b>121</b>	<b>100.0</b>	<b>100.0</b>	<b>7,121</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	45	5.6	5.9	3,272	2.8	3.3	80	10.5	8.5	7,188	6.9	5.1	20.7
Moderate	137	17.1	17.6	13,309	11.3	12.7	168	22.1	20.7	19,987	19.1	15.5	16.6
Middle	171	21.3	22.1	20,600	17.5	19.3	172	22.6	23.2	19,915	19.0	20.5	20.2
Upper	286	35.7	40.1	54,079	46.0	51.3	256	33.6	36.1	49,722	47.4	47.1	42.5
Unknown	163	20.3	14.3	26,359	22.4	13.5	85	11.2	11.5	8,043	7.7	11.8	0.0
<b>Total</b>	<b>802</b>	<b>100.0</b>	<b>100.0</b>	<b>117,619</b>	<b>100.0</b>	<b>100.0</b>	<b>761</b>	<b>100.0</b>	<b>100.0</b>	<b>104,855</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 45060 (Syracuse, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	376	59.7	40.8	23,938	32.4	27.9	88.6
<b>Over \$1 Million</b>	231	36.7		44,539	60.3		10.2
<b>Revenue Unknown</b>	23	3.7		5,359	7.3		1.2
<b>Total</b>	630	100.0		73,836	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	467	74.1	92.3	13,143	17.8	35.2	
<b>\$100,001 - \$250,000</b>	79	12.5	4.1	14,089	19.1	17.1	
<b>\$250,001 - \$1 Million</b>	84	13.3	3.6	46,604	63.1	47.7	
<b>Total</b>	630	100.0	100.0	73,836	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	324	86.2		7,162	29.9		
<b>\$100,001 - \$250,000</b>	30	8.0		5,168	21.6		
<b>\$250,001 - \$1 Million</b>	22	5.9		11,608	48.5		
<b>Total</b>	376	100.0		23,938	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 45060 (Syracuse, NY)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	688	38.8	34.4	41,113	19.2	20.2	436	34.1	41.7	27,224	21.4	27.3	88.9
<b>Over \$1 Million</b>	496	28.0		128,196	59.9		268	20.9		66,068	51.9		9.9
<b>Revenue Unknown</b>	590	33.3		44,729	20.9		576	45.0		34,092	26.8		1.2
<b>Total</b>	1,774	100.0		214,038	100.0		1,280	100.0		127,384	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	1,219	68.7	83.4	40,710	19.0	26.5	951	74.3	89.4	26,204	20.6	31.7	
<b>\$100,001 - \$250,000</b>	296	16.7	9.2	48,495	22.7	21.4	180	14.1	5.9	29,126	22.9	20.5	
<b>\$250,001 - \$1 Million</b>	259	14.6	7.4	124,833	58.3	52.0	149	11.6	4.6	72,054	56.6	47.8	
<b>Total</b>	1,774	100.0	100.0	214,038	100.0	100.0	1,280	100.0	100.0	127,384	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	607	88.2		17,766	43.2		379	86.9		9,868	36.2		
<b>\$100,001 - \$250,000</b>	46	6.7		7,043	17.1		29	6.7		4,243	15.6		
<b>\$250,001 - \$1 Million</b>	35	5.1		16,304	39.7		28	6.4		13,113	48.2		
<b>Total</b>	688	100.0		41,113	100.0		436	100.0		27,224	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 46540 (Utica-Rome, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	4	4.2	5.8	302	2.2	3.5	5.0
Moderate	6	6.3	8.5	427	3.1	5.8	7.2
Middle	56	58.9	56.3	7,016	50.4	53.0	60.0
Upper	29	30.5	29.3	6,166	44.3	37.7	27.8
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	
<b>Total</b>	<b>95</b>	<b>100.0</b>	<b>100.0</b>	<b>13,911</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	1	1.3	4.0	25	0.3	2.4	5.0
Moderate	3	3.8	5.6	175	2.2	3.9	7.2
Middle	43	55.1	57.3	3,135	40.2	53.0	60.0
Upper	31	39.7	33.1	4,459	57.2	40.7	27.8
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	
<b>Total</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>7,794</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	2.2	4.7	20	0.7	3.2	5.0
Moderate	1	2.2	4.2	11	0.4	2.7	7.2
Middle	26	57.8	59.5	1,060	38.8	56.5	60.0
Upper	17	37.8	31.5	1,642	60.1	37.7	27.8
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	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>2,733</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	1	20.0	20.8	2,695	11.1	16.0	25.7
Moderate	0	0.0	4.2	0	0.0	0.2	19.5
Middle	2	40.0	54.2	655	2.7	15.8	38.6
Upper	1	20.0	16.7	4,000	16.4	19.8	16.1
Unknown	1	20.0	4.2	17,012	69.8	48.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>24,362</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	7	3.0	5.3	3,042	6.1	3.8	5.0
Moderate	13	5.5	7.2	798	1.6	4.9	7.2
Middle	134	56.8	56.8	12,446	24.9	51.1	60.0
Upper	81	34.3	30.7	16,703	33.4	37.8	27.8
Unknown	1	0.4	0.0	17,012	34.0	2.4	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>236</b>	<b>100.0</b>	<b>100.0</b>	<b>50,001</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 46540 (Utica-Rome, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	5	5.2	4.4	461	3.3	2.7	5	4.5	5.7	494	2.8	3.7	5.0
Moderate	10	10.3	8.5	977	6.9	5.9	15	13.6	8.9	1,610	9.1	6.1	7.2
Middle	50	51.5	55.7	6,910	48.7	51.4	63	57.3	54.0	9,478	53.5	49.3	60.0
Upper	32	33.0	31.4	5,835	41.1	40.0	27	24.5	31.4	6,134	34.6	40.8	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>14,183</b>	<b>100.0</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>17,716</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	1.1	1.6	81	0.6	0.9	0	0.0	2.5	0	0.0	1.5	5.0
Moderate	2	2.3	4.6	242	1.9	2.8	5	5.6	5.3	511	3.6	3.4	7.2
Middle	45	51.1	52.6	4,921	38.6	47.8	45	50.6	54.5	6,242	44.5	49.7	60.0
Upper	40	45.5	41.2	7,509	58.9	48.5	39	43.8	37.7	7,266	51.8	45.4	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>88</b>	<b>100.0</b>	<b>100.0</b>	<b>12,753</b>	<b>100.0</b>	<b>100.0</b>	<b>89</b>	<b>100.0</b>	<b>100.0</b>	<b>14,019</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	5.6	4.8	55	3.4	3.9	1	2.4	2.4	50	1.7	1.6	5.0
Moderate	2	5.6	4.6	31	1.9	4.1	2	4.9	5.6	100	3.3	4.1	7.2
Middle	17	47.2	54.7	741	45.9	56.3	22	53.7	55.0	1,432	47.5	52.3	60.0
Upper	15	41.7	35.8	786	48.7	35.7	16	39.0	37.0	1,433	47.5	42.0	27.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>1,613</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>3,015</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	33.3	0	0.0	36.6	2	50.0	36.8	222	3.5	63.5	
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	5.3	0	0.0	3.1	19.5
Middle	0	0.0	38.9	0	0.0	22.8	1	25.0	42.1	5,500	85.6	27.0	38.6
Upper	0	0.0	22.2	0	0.0	12.4	1	25.0	15.8	705	11.0	6.4	16.1
Unknown	0	0.0	5.6	0	0.0	28.3	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>6,427</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	9	3.6	3.6	684	2.2	4.2	9	3.6	4.1	831	2.0	4.7	
Moderate	16	6.4	6.7	1,331	4.3	4.3	22	8.8	7.1	2,221	5.3	4.9	7.2
Middle	134	53.4	54.8	14,331	46.0	48.7	134	53.4	54.2	22,878	54.8	48.7	60.0
Upper	92	36.7	34.9	14,807	47.5	41.1	86	34.3	34.6	15,789	37.8	41.7	27.8
Unknown	0	0.0	0.0	0	0.0	1.8	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>251</b>	<b>100.0</b>	<b>100.0</b>	<b>31,153</b>	<b>100.0</b>	<b>100.0</b>	<b>251</b>	<b>100.0</b>	<b>100.0</b>	<b>41,719</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 46540 (Utica-Rome, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	22	9.7	11.2	2,811	12.1	13.0	11.7
Moderate	28	12.3	10.4	4,305	18.5	16.4	14.1
Middle	102	44.9	44.6	8,935	38.4	42.6	45.9
Upper	67	29.5	31.0	5,637	24.3	23.3	27.1
Unknown	8	3.5	1.2	1,552	6.7	4.0	1.2
Tract-Unk	0	0.0	1.6	0	0.0	0.7	
<b>Total</b>	<b>227</b>	<b>100.0</b>	<b>100.0</b>	<b>23,240</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 46540 (Utica-Rome, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	56	10.7	12.1	7,400	14.2	16.5	53	9.3	11.0	5,287	12.7	11.8	11.9
Moderate	64	12.3	12.2	6,056	11.6	14.8	79	13.9	11.1	6,157	14.8	14.7	13.9
Middle	246	47.2	44.6	23,498	45.0	37.5	279	49.2	47.6	17,311	41.5	39.5	45.6
Upper	147	28.2	29.2	14,777	28.3	26.5	153	27.0	28.8	12,220	29.3	28.8	27.3
Unknown	8	1.5	1.6	543	1.0	4.6	3	0.5	1.1	752	1.8	5.0	1.3
Tract-Unk	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>521</b>	<b>100.0</b>	<b>100.0</b>	<b>52,274</b>	<b>100.0</b>	<b>100.0</b>	<b>567</b>	<b>100.0</b>	<b>100.0</b>	<b>41,727</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 46540 (Utica-Rome, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	10	10.5	11.4	738	5.3	6.8	22.0
<b>Moderate</b>	28	29.5	26.1	2,712	19.5	20.2	16.9
<b>Middle</b>	26	27.4	23.5	3,454	24.8	22.6	21.5
<b>Upper</b>	27	28.4	27.5	6,520	46.9	39.5	39.6
<b>Unknown</b>	4	4.2	11.6	487	3.5	10.9	0.0
<b>Total</b>	95	100.0	100.0	13,911	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	10	12.8	10.8	561	7.2	6.7	22.0
<b>Moderate</b>	12	15.4	19.0	1,138	14.6	14.0	16.9
<b>Middle</b>	23	29.5	25.8	1,717	22.0	23.7	21.5
<b>Upper</b>	30	38.5	38.7	4,136	53.1	48.0	39.6
<b>Unknown</b>	3	3.8	5.8	242	3.1	7.6	0.0
<b>Total</b>	78	100.0	100.0	7,794	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	3	6.7	13.1	130	4.8	9.8	22.0
<b>Moderate</b>	7	15.6	19.6	271	9.9	17.2	16.9
<b>Middle</b>	19	42.2	28.0	725	26.5	25.6	21.5
<b>Upper</b>	15	33.3	38.5	1,577	57.7	46.7	39.6
<b>Unknown</b>	1	2.2	0.7	30	1.1	0.6	0.0
<b>Total</b>	45	100.0	100.0	2,733	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	23	10.0	11.1	1,429	5.6	6.8	22.0
<b>Moderate</b>	47	20.3	22.2	4,121	16.1	17.8	16.9
<b>Middle</b>	68	29.4	24.1	5,896	23.0	22.5	21.5
<b>Upper</b>	72	31.2	32.1	12,233	47.7	42.0	39.6
<b>Unknown</b>	21	9.1	10.5	1,960	7.6	10.9	0.0
<b>Total</b>	231	100.0	100.0	25,639	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 46540 (Utica-Rome, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	9	9.3	9.8	809	5.7	5.9	10	9.1	10.6	867	4.9	6.4	22.0
Moderate	19	19.6	25.6	2,328	16.4	20.1	30	27.3	23.2	3,773	21.3	17.9	16.9
Middle	28	28.9	24.1	3,712	26.2	23.8	39	35.5	23.7	6,467	36.5	22.7	21.5
Upper	32	33.0	29.8	6,782	47.8	40.5	26	23.6	28.9	6,189	34.9	40.1	39.6
Unknown	9	9.3	10.7	552	3.9	9.7	5	4.5	13.6	420	2.4	12.9	0.0
<b>Total</b>	<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>14,183</b>	<b>100.0</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>17,716</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	11	12.5	5.2	648	5.1	2.5	2	2.2	6.6	138	1.0	3.8	22.0
Moderate	17	19.3	15.8	1,829	14.3	10.7	18	20.2	17.2	1,786	12.7	12.4	16.9
Middle	21	23.9	23.8	2,527	19.8	19.4	21	23.6	25.6	2,586	18.4	22.6	21.5
Upper	39	44.3	45.9	7,749	60.8	56.4	47	52.8	42.4	9,440	67.3	51.5	39.6
Unknown	0	0.0	9.3	0	0.0	11.0	1	1.1	8.2	69	0.5	9.6	0.0
<b>Total</b>	<b>88</b>	<b>100.0</b>	<b>100.0</b>	<b>12,753</b>	<b>100.0</b>	<b>100.0</b>	<b>89</b>	<b>100.0</b>	<b>100.0</b>	<b>14,019</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	8	22.2	8.9	286	17.7	6.4	3	7.3	7.1	200	6.6	5.2	22.0
Moderate	7	19.4	19.5	452	28.0	17.4	7	17.1	16.4	380	12.6	11.8	16.9
Middle	6	16.7	24.7	209	13.0	21.0	15	36.6	25.6	1,175	39.0	22.6	21.5
Upper	15	41.7	45.3	666	41.3	53.5	16	39.0	50.3	1,260	41.8	60.1	39.6
Unknown	0	0.0	1.6	0	0.0	1.7	0	0.0	0.6	0	0.0	0.3	0.0
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>1,613</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>3,015</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	28	11.2	7.4	1,743	5.6	4.4	15	6.1	8.5	1,205	3.4	5.2	22.0
Moderate	43	17.1	20.1	4,609	14.8	15.6	55	22.3	19.6	5,939	16.8	15.2	16.9
Middle	55	21.9	22.8	6,448	20.7	21.2	75	30.4	24.5	10,228	29.0	22.5	21.5
Upper	86	34.3	36.1	15,197	48.8	46.4	89	36.0	36.4	16,889	47.9	45.7	39.6
Unknown	39	15.5	13.6	3,156	10.1	12.5	13	5.3	10.9	1,031	2.9	11.5	0.0
<b>Total</b>	<b>251</b>	<b>100.0</b>	<b>100.0</b>	<b>31,153</b>	<b>100.0</b>	<b>100.0</b>	<b>247</b>	<b>100.0</b>	<b>100.0</b>	<b>35,292</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 46540 (Utica-Rome, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
\$1 Million or Less	150	66.1	42.8	7,906	34.0	38.2	89.4
Over \$1 Million	68	30.0		13,885	59.7		9.1
Revenue Unknown	9	4.0		1,449	6.2		1.5
<b>Total</b>	<b>227</b>	<b>100.0</b>		<b>23,240</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	179	78.9	94.2	5,171	22.3	42.5	
\$100,001 - \$250,000	24	10.6	3.3	4,325	18.6	18.1	
\$250,001 - \$1 Million	24	10.6	2.5	13,744	59.1	39.5	
<b>Total</b>	<b>227</b>	<b>100.0</b>	<b>100.0</b>	<b>23,240</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	131	87.3		3,240	41.0		
\$100,001 - \$250,000	13	8.7		2,180	27.6		
\$250,001 - \$1 Million	6	4.0		2,486	31.4		
<b>Total</b>	<b>150</b>	<b>100.0</b>		<b>7,906</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 46540 (Utica-Rome, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	227	43.6	32.4	13,305	25.5	22.2	199	35.1	44.8	9,907	23.7	26.1	89.5
Over \$1 Million	135	25.9		29,108	55.7		118	20.8		23,403	56.1		8.8
Revenue Unknown	159	30.5		9,861	18.9		250	44.1		8,417	20.2		1.7
<b>Total</b>	<b>521</b>	<b>100.0</b>		<b>52,274</b>	<b>100.0</b>		<b>567</b>	<b>100.0</b>		<b>41,727</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	380	72.9	86.4	12,821	24.5	31.4	465	82.0	91.9	12,623	30.3	36.4	
\$100,001 - \$250,000	85	16.3	8.3	12,292	23.5	23.3	63	11.1	4.9	10,166	24.4	21.1	
\$250,001 - \$1 Million	56	10.7	5.3	27,161	52.0	45.4	39	6.9	3.2	18,938	45.4	42.5	
<b>Total</b>	<b>521</b>	<b>100.0</b>	<b>100.0</b>	<b>52,274</b>	<b>100.0</b>	<b>100.0</b>	<b>567</b>	<b>100.0</b>	<b>100.0</b>	<b>41,727</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	202	89.0		6,281	47.2		179	89.9		4,445	44.9		
\$100,001 - \$250,000	15	6.6		2,144	16.1		13	6.5		2,009	20.3		
\$250,001 - \$1 Million	10	4.4		4,880	36.7		7	3.5		3,453	34.9		
<b>Total</b>	<b>227</b>	<b>100.0</b>		<b>13,305</b>	<b>100.0</b>		<b>199</b>	<b>100.0</b>		<b>9,907</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 48060 (Watertown-Fort Drum, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	18.2	8.6	128	8.9	5.2	7.9
Middle	9	81.8	81.7	1,309	91.1	84.7	83.2
Upper	0	0.0	9.6	0	0.0	10.0	8.9
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,437</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	6.4	0	0.0	3.5	7.9
Middle	4	100.0	85.1	705	100.0	88.8	83.2
Upper	0	0.0	8.5	0	0.0	7.7	8.9
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	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>705</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	4.4	15	10.7	2.1	7.9
Middle	1	50.0	86.8	125	89.3	87.8	83.2
Upper	0	0.0	8.8	0	0.0	10.1	8.9
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	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>140</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	50.0	0	0.0	4.9	35.0
Middle	1	100.0	50.0	5,033	100.0	95.1	62.1
Upper	0	0.0	0.0	0	0.0	0.0	2.9
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>5,033</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	22.7	8.0	342	4.4	4.9	7.9
Middle	16	72.7	82.7	7,308	93.6	85.8	83.2
Upper	1	4.5	9.2	161	2.1	9.2	8.9
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	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>7,811</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 48060 (Watertown-Fort Drum, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	11.1	8.1	474	5.9	5.3	1	9.1	11.2	83	3.9	7.6	7.9
Middle	35	77.8	82.6	6,956	86.6	85.4	10	90.9	80.3	2,054	96.1	83.5	83.2
Upper	5	11.1	9.3	606	7.5	9.3	0	0.0	8.5	0	0.0	9.0	8.9
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	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>8,036</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>2,137</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	11.1	4.4	120	6.0	2.3	1	16.7	6.4	123	9.8	4.0	7.9
Middle	6	66.7	86.3	1,292	65.1	87.7	5	83.3	85.2	1,127	90.2	87.4	83.2
Upper	2	22.2	9.3	572	28.8	10.0	0	0.0	8.3	0	0.0	8.5	8.9
Unknown	0	0.0	0.0	0	0.0	0.0	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	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,984</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,250</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	3.5	0	0.0	7.0	0	0.0	4.3	7.9
Middle	2	100.0	83.7	266	100.0	85.7	2	66.7	85.4	147	73.5	91.9	83.2
Upper	0	0.0	10.9	0	0.0	10.8	1	33.3	7.6	53	26.5	3.7	8.9
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	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>266</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	1	100.0	46.7	310	100.0	68.8	0	0.0	41.2	0	0.0	7.0	35.0
Middle	0	0.0	53.3	0	0.0	31.2	0	0.0	58.8	0	0.0	93.0	62.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.9
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>310</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	11	16.4	6.6	1,298	11.0	5.2	2	9.1	9.4	206	5.3	6.4	7.9
Middle	49	73.1	83.9	9,322	79.0	85.2	19	86.4	82.3	3,619	93.3	85.2	83.2
Upper	7	10.4	9.4	1,178	10.0	9.5	1	4.5	8.3	53	1.4	8.4	8.9
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	
<b>Total</b>	<b>67</b>	<b>100.0</b>	<b>100.0</b>	<b>11,798</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>3,878</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 48060 (Watertown-Fort Drum, NY)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.7	0	0.0	17.3	15.6
Middle	15	83.3	76.5	1,680	94.3	74.4	77.5
Upper	3	16.7	6.1	102	5.7	7.3	6.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	3.7	0	0.0	1.0	
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>1,782</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 48060 (Watertown-Fort Drum, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	2.2	14.4	20	0.4	14.4	1	3.1	13.0	6	0.1	14.1	16.6
Middle	39	86.7	79.4	5,288	95.1	81.1	28	87.5	79.8	4,198	98.0	82.1	76.7
Upper	5	11.1	5.4	252	4.5	4.2	3	9.4	6.2	80	1.9	3.6	6.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.7	0	0.0	0.3	0	0.0	1.0	0	0.0	0.2	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>5,560</b>	<b>100.0</b>	<b>100.0</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>4,284</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 48060 (Watertown-Fort Drum, NY)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	3.0	0	0.0	1.3	19.8
<b>Moderate</b>	1	9.1	12.6	111	7.7	8.2	18.3
<b>Middle</b>	2	18.2	26.7	306	21.3	23.3	22.4
<b>Upper</b>	5	45.5	46.9	1,008	70.1	56.4	39.5
<b>Unknown</b>	3	27.3	10.8	12	0.8	10.9	0.0
<b>Total</b>	11	100.0	100.0	1,437	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	4.8	0	0.0	2.4	19.8
<b>Moderate</b>	0	0.0	11.6	0	0.0	7.1	18.3
<b>Middle</b>	1	25.0	21.6	110	15.6	17.9	22.4
<b>Upper</b>	3	75.0	49.4	595	84.4	54.4	39.5
<b>Unknown</b>	0	0.0	12.5	0	0.0	18.2	0.0
<b>Total</b>	4	100.0	100.0	705	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	2.0	0	0.0	1.1	19.8
<b>Moderate</b>	1	50.0	11.7	15	10.7	9.6	18.3
<b>Middle</b>	0	0.0	25.4	0	0.0	17.7	22.4
<b>Upper</b>	1	50.0	59.5	125	89.3	70.7	39.5
<b>Unknown</b>	0	0.0	1.5	0	0.0	0.9	0.0
<b>Total</b>	2	100.0	100.0	140	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	0	0.0	3.6	0	0.0	1.7	19.8
<b>Moderate</b>	2	9.5	12.3	126	4.5	7.9	18.3
<b>Middle</b>	3	14.3	24.7	416	15.0	21.2	22.4
<b>Upper</b>	9	42.9	47.9	1,728	62.2	55.9	39.5
<b>Unknown</b>	7	33.3	11.5	508	18.3	13.4	0.0
<b>Total</b>	21	100.0	100.0	2,778	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 48060 (Watertown-Fort Drum, 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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	6.7	2.4	200	2.5	1.1	1	9.1	4.2	83	3.9	2.0	19.8
Moderate	8	17.8	14.0	811	10.1	8.9	0	0.0	16.6	0	0.0	11.3	18.3
Middle	15	33.3	25.7	2,630	32.7	21.5	3	27.3	28.8	593	27.7	25.8	22.4
Upper	15	33.3	48.3	3,911	48.7	58.7	6	54.5	39.2	1,380	64.6	48.4	39.5
Unknown	4	8.9	9.6	484	6.0	9.8	1	9.1	11.2	81	3.8	12.5	0.0
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>8,036</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>2,137</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	11.1	1.5	45	2.3	0.6	0	0.0	3.4	0	0.0	1.8	19.8
Moderate	2	22.2	7.3	206	10.4	4.3	1	16.7	10.7	123	9.8	7.0	18.3
Middle	0	0.0	15.5	0	0.0	11.3	0	0.0	17.5	0	0.0	13.6	22.4
Upper	4	44.4	57.3	1,263	63.7	62.6	5	83.3	48.8	1,127	90.2	55.7	39.5
Unknown	2	22.2	18.4	470	23.7	21.1	0	0.0	19.6	0	0.0	21.9	0.0
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,984</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,250</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.9	0	0.0	3.3	0	0.0	8.2	0	0.0	3.5	19.8
Moderate	0	0.0	19.0	0	0.0	12.7	0	0.0	15.2	0	0.0	7.4	18.3
Middle	1	50.0	21.7	116	43.6	20.1	1	33.3	20.3	72	36.0	16.0	22.4
Upper	1	50.0	52.7	150	56.4	63.1	2	66.7	53.8	128	64.0	67.4	39.5
Unknown	0	0.0	1.6	0	0.0	0.8	0	0.0	2.5	0	0.0	5.8	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>266</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	4	6.1	2.2	245	2.1	0.9	1	4.5	4.1	83	2.1	2.0	19.8
Moderate	10	15.2	11.2	1,017	8.9	7.0	1	4.5	14.2	123	3.2	9.6	18.3
Middle	16	24.2	20.5	2,746	23.9	16.8	4	18.2	24.0	665	17.1	21.3	22.4
Upper	20	30.3	50.2	5,324	46.3	58.5	13	59.1	43.2	2,635	67.9	51.1	39.5
Unknown	16	24.2	16.0	2,156	18.8	16.8	3	13.6	14.5	372	9.6	16.0	0.0
<b>Total</b>	<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>11,488</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>3,878</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 48060 (Watertown-Fort Drum, NY)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	11	61.1	42.8	314	17.6	36.0	88.4
Over \$1 Million	7	38.9		1,468	82.4		9.1
Revenue Unknown	0	0.0		0	0.0		2.5
<b>Total</b>	<b>18</b>	<b>100.0</b>		<b>1,782</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	16	88.9	90.2	491	27.6	36.1	
\$100,001 - \$250,000	0	0.0	5.7	0	0.0	19.7	
\$250,001 - \$1 Million	2	11.1	4.1	1,291	72.4	44.1	
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>1,782</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	11	100.0		314	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>11</b>	<b>100.0</b>		<b>314</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 48060 (Watertown-Fort Drum, NY)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
<b>By Revenue</b>													
\$1 Million or Less	14	31.1	32.3	758	13.6	24.0	14	43.8	40.7	1,485	34.7	31.5	88.0
Over \$1 Million	13	28.9		2,526	45.4		9	28.1		1,770	41.3		9.3
Revenue Unknown	18	40.0		2,276	40.9		9	28.1		1,029	24.0		2.7
<b>Total</b>	<b>45</b>	<b>100.0</b>		<b>5,560</b>	<b>100.0</b>		<b>32</b>	<b>100.0</b>		<b>4,284</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	25	55.6	84.6	894	16.1	31.8	20	62.5	88.8	799	18.7	34.3	
\$100,001 - \$250,000	14	31.1	9.3	2,218	39.9	22.8	6	18.8	6.6	903	21.1	20.4	
\$250,001 - \$1 Million	6	13.3	6.1	2,448	44.0	45.5	6	18.8	4.7	2,582	60.3	45.3	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>5,560</b>	<b>100.0</b>	<b>100.0</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>4,284</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	13	92.9		358	47.2		12	85.7		565	38.0		
\$100,001 - \$250,000	0	0.0		0	0.0		1	7.1		120	8.1		
\$250,001 - \$1 Million	1	7.1		400	52.8		1	7.1		800	53.9		
<b>Total</b>	<b>14</b>	<b>100.0</b>		<b>758</b>	<b>100.0</b>		<b>14</b>	<b>100.0</b>		<b>1,485</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA New York (Group A)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	2	0.6	0.2	38	0.1	0.1	0.5
Moderate	27	8.5	6.3	1,840	4.9	3.8	6.8
Middle	272	85.8	86.3	33,327	89.7	86.7	87.7
Upper	16	5.0	7.3	1,969	5.3	9.4	5.1
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	
<b>Total</b>	<b>317</b>	<b>100.0</b>	<b>100.0</b>	<b>37,174</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.2	0	0.0	0.2	0.5
Moderate	5	3.1	4.6	461	3.1	3.2	6.8
Middle	145	91.2	87.8	13,521	90.0	88.5	87.7
Upper	9	5.7	7.4	1,048	7.0	8.1	5.1
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	
<b>Total</b>	<b>159</b>	<b>100.0</b>	<b>100.0</b>	<b>15,030</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	3	3.4	5.9	88	1.8	4.4	6.8
Middle	81	92.0	87.6	4,330	90.6	89.2	87.7
Upper	4	4.5	6.6	359	7.5	6.4	5.1
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	
<b>Total</b>	<b>88</b>	<b>100.0</b>	<b>100.0</b>	<b>4,777</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	6.8
Moderate	0	0.0	8.7	0	0.0	5.0	10.4
Middle	2	100.0	87.0	830	100.0	93.4	70.0
Upper	0	0.0	4.3	0	0.0	1.6	12.7
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	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>830</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	2	0.3	0.1	38	0.1	0.1	0.5
Moderate	37	6.3	5.6	2,503	4.2	3.7	6.8
Middle	523	88.3	87.0	53,880	89.9	87.7	87.7
Upper	30	5.1	7.2	3,509	5.9	8.5	5.1
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	
<b>Total</b>	<b>592</b>	<b>100.0</b>	<b>100.0</b>	<b>59,930</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA New York (Group A)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	0.8	0.2	331	0.7	0.1	2	0.5	0.3	134	0.2	0.1	0.5
Moderate	27	7.6	6.0	2,208	4.7	3.7	34	7.8	6.4	2,924	4.9	4.1	6.8
Middle	295	82.6	85.9	40,581	86.2	86.6	374	85.8	86.3	52,354	88.3	87.0	87.7
Upper	32	9.0	7.9	3,973	8.4	9.5	26	6.0	7.0	3,883	6.5	8.8	5.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>357</b>	<b>100.0</b>	<b>100.0</b>	<b>47,093</b>	<b>100.0</b>	<b>100.0</b>	<b>436</b>	<b>100.0</b>	<b>100.0</b>	<b>59,295</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	0.5	0.0	40	0.2	0.0	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	4	2.0	3.2	242	1.1	2.0	4	1.9	3.3	250	1.0	2.5	6.8
Middle	186	93.0	87.4	21,316	93.3	87.2	196	92.5	89.0	24,302	93.3	88.9	87.7
Upper	9	4.5	9.4	1,249	5.5	10.8	12	5.7	7.6	1,498	5.8	8.6	5.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>22,847</b>	<b>100.0</b>	<b>100.0</b>	<b>212</b>	<b>100.0</b>	<b>100.0</b>	<b>26,050</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	1	1.1	4.4	35	0.6	3.2	1	1.0	4.8	15	0.2	3.2	6.8
Middle	87	91.6	88.3	5,123	89.8	89.0	100	95.2	88.4	6,583	93.2	90.2	87.7
Upper	7	7.4	6.8	544	9.5	7.4	4	3.8	6.7	462	6.5	6.6	5.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>95</b>	<b>100.0</b>	<b>100.0</b>	<b>5,702</b>	<b>100.0</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>	<b>7,060</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	8.9	0	0.0	1.9	0	0.0	2.3	0	0.0	34.7	6.8
Moderate	0	0.0	11.1	0	0.0	19.2	0	0.0	7.0	0	0.0	1.9	10.4
Middle	7	100.0	71.1	6,005	100.0	37.9	3	100.0	76.7	9,870	100.0	57.2	70.0
Upper	0	0.0	8.9	0	0.0	41.0	0	0.0	14.0	0	0.0	6.2	12.7
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	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>6,005</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>9,870</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	5	0.7	0.3	464	0.5	0.2	2	0.3	0.2	134	0.1	1.0	0.5
Moderate	33	4.5	4.8	2,548	2.9	3.8	42	5.4	5.2	3,351	3.2	3.4	6.8
Middle	636	87.6	86.6	78,427	89.5	84.9	695	89.0	87.5	94,832	91.0	87.0	87.7
Upper	52	7.2	8.3	6,185	7.1	11.2	42	5.4	7.2	5,843	5.6	8.5	5.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>726</b>	<b>100.0</b>	<b>100.0</b>	<b>87,624</b>	<b>100.0</b>	<b>100.0</b>	<b>781</b>	<b>100.0</b>	<b>100.0</b>	<b>104,160</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA New York (Group A)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	13	3.6	2.3	525	2.5	2.0	3.4
Moderate	17	4.8	7.7	2,278	11.0	9.0	8.5
Middle	311	87.1	83.2	17,279	83.8	82.6	82.0
Upper	16	4.5	4.9	534	2.6	5.5	6.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.9	0	0.0	0.8	
<b>Total</b>	<b>357</b>	<b>100.0</b>	<b>100.0</b>	<b>20,616</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Non-MSA New York (Group A)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	37	5.1	2.7	5,541	9.1	4.2	38	5.9	2.6	3,789	7.8	3.9	3.3
Moderate	44	6.1	7.9	4,876	8.0	9.2	30	4.7	7.5	3,261	6.8	9.0	8.2
Middle	607	83.7	84.2	45,998	75.6	81.5	548	85.2	84.7	39,211	81.2	82.9	82.4
Upper	37	5.1	4.6	4,396	7.2	5.0	27	4.2	4.7	2,010	4.2	4.1	6.2
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	0.5	0	0.0	0.2	0	0.0	0.6	0	0.0	0.1	
<b>Total</b>	<b>725</b>	<b>100.0</b>	<b>100.0</b>	<b>60,811</b>	<b>100.0</b>	<b>100.0</b>	<b>643</b>	<b>100.0</b>	<b>100.0</b>	<b>48,271</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Non-MSA New York (Group A)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	31	9.8	8.8	1,870	5.0	4.8	21.7
<b>Moderate</b>	72	22.7	21.5	6,087	16.4	15.6	18.8
<b>Middle</b>	76	24.0	23.7	8,429	22.7	21.7	22.1
<b>Upper</b>	104	32.8	32.4	18,920	50.9	45.2	37.4
<b>Unknown</b>	34	10.7	13.7	1,868	5.0	12.7	0.0
<b>Total</b>	317	100.0	100.0	37,174	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	13	8.2	10.5	554	3.7	6.1	21.7
<b>Moderate</b>	40	25.2	18.1	3,286	21.9	12.8	18.8
<b>Middle</b>	35	22.0	26.7	3,408	22.7	23.7	22.1
<b>Upper</b>	66	41.5	37.6	7,175	47.7	48.5	37.4
<b>Unknown</b>	5	3.1	7.1	607	4.0	8.9	0.0
<b>Total</b>	159	100.0	100.0	15,030	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	15	17.0	9.5	462	9.7	6.8	21.7
<b>Moderate</b>	15	17.0	18.9	680	14.2	15.4	18.8
<b>Middle</b>	20	22.7	27.5	985	20.6	25.0	22.1
<b>Upper</b>	36	40.9	40.1	2,575	53.9	48.5	37.4
<b>Unknown</b>	2	2.3	4.0	75	1.6	4.3	0.0
<b>Total</b>	88	100.0	100.0	4,777	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	59	10.0	9.3	2,886	4.9	5.2	21.7
<b>Moderate</b>	127	21.5	19.5	10,053	17.0	14.6	18.8
<b>Middle</b>	131	22.2	24.7	12,822	21.7	22.1	22.1
<b>Upper</b>	206	34.9	34.2	28,670	48.5	45.6	37.4
<b>Unknown</b>	67	11.4	12.3	4,669	7.9	12.4	0.0
<b>Total</b>	590	100.0	100.0	59,100	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA New York (Group A)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	25	7.0	7.4	1,918	4.1	3.8	44	10.1	8.2	3,464	5.8	4.4	21.7
Moderate	103	28.9	22.1	9,732	20.7	15.3	117	26.8	23.7	11,916	20.1	16.9	18.8
Middle	74	20.7	23.4	9,055	19.2	20.8	88	20.2	22.2	11,783	19.9	20.3	22.1
Upper	111	31.1	33.3	21,494	45.6	46.9	136	31.2	30.8	27,627	46.6	44.0	37.4
Unknown	44	12.3	13.8	4,894	10.4	13.1	51	11.7	15.1	4,505	7.6	14.4	0.0
<b>Total</b>	<b>357</b>	<b>100.0</b>	<b>100.0</b>	<b>47,093</b>	<b>100.0</b>	<b>100.0</b>	<b>436</b>	<b>100.0</b>	<b>100.0</b>	<b>59,295</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	12	6.0	5.1	558	2.4	2.5	19	9.0	6.6	1,321	5.1	3.6	21.7
Moderate	42	21.0	15.2	2,986	13.1	9.6	53	25.0	17.6	4,961	19.0	12.2	18.8
Middle	60	30.0	24.9	5,263	23.0	20.0	42	19.8	25.5	4,227	16.2	21.6	22.1
Upper	79	39.5	46.3	12,850	56.2	58.0	93	43.9	41.4	14,827	56.9	52.3	37.4
Unknown	7	3.5	8.5	1,190	5.2	9.9	5	2.4	8.9	714	2.7	10.3	0.0
<b>Total</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>22,847</b>	<b>100.0</b>	<b>100.0</b>	<b>212</b>	<b>100.0</b>	<b>100.0</b>	<b>26,050</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	11	11.6	9.3	406	7.1	5.9	12	11.4	9.7	591	8.4	7.4	21.7
Moderate	12	12.6	18.5	486	8.5	13.7	27	25.7	21.1	1,289	18.3	16.2	18.8
Middle	30	31.6	26.4	1,642	28.8	22.5	23	21.9	27.7	1,285	18.2	24.4	22.1
Upper	37	38.9	43.5	2,916	51.1	55.6	39	37.1	38.7	3,670	52.0	49.3	37.4
Unknown	5	5.3	2.3	252	4.4	2.3	4	3.8	2.9	225	3.2	2.7	0.0
<b>Total</b>	<b>95</b>	<b>100.0</b>	<b>100.0</b>	<b>5,702</b>	<b>100.0</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>	<b>7,060</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	48	6.7	6.5	2,882	3.5	3.4	75	9.6	7.7	5,376	5.7	4.2	21.7
Moderate	157	21.8	18.5	13,204	16.2	12.9	197	25.3	20.8	18,166	19.3	14.9	18.8
Middle	164	22.8	23.2	15,960	19.6	20.0	153	19.7	23.7	17,295	18.3	20.8	22.1
Upper	227	31.6	37.4	37,260	45.7	50.1	268	34.4	35.0	46,124	48.9	47.1	37.4
Unknown	123	17.1	14.5	12,313	15.1	13.7	85	10.9	12.9	7,329	7.8	13.0	0.0
<b>Total</b>	<b>719</b>	<b>100.0</b>	<b>100.0</b>	<b>81,619</b>	<b>100.0</b>	<b>100.0</b>	<b>778</b>	<b>100.0</b>	<b>100.0</b>	<b>94,290</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA New York (Group A)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	254	71.1	47.7	6,495	31.5	32.9	88.0
Over \$1 Million	95	26.6		12,418	60.2		9.1
Revenue Unknown	8	2.2		1,703	8.3		2.9
<b>Total</b>	<b>357</b>	<b>100.0</b>		<b>20,616</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	314	88.0	92.7	6,977	33.8	39.9	
\$100,001 - \$250,000	28	7.8	4.3	5,036	24.4	19.5	
\$250,001 - \$1 Million	15	4.2	2.9	8,603	41.7	40.7	
<b>Total</b>	<b>357</b>	<b>100.0</b>	<b>100.0</b>	<b>20,616</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	243	95.7		4,341	66.8		
\$100,001 - \$250,000	9	3.5		1,508	23.2		
\$250,001 - \$1 Million	2	0.8		646	9.9		
<b>Total</b>	<b>254</b>	<b>100.0</b>		<b>6,495</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA New York (Group A)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
<b>By Revenue</b>													
\$1 Million or Less	314	43.3	37.2	13,019	21.4	25.8	255	39.7	45.3	9,321	19.3	28.8	88.0
Over \$1 Million	149	20.6		32,494	53.4		108	16.8		19,916	41.3		8.8
Revenue Unknown	262	36.1		15,298	25.2		280	43.5		19,034	39.4		3.2
<b>Total</b>	<b>725</b>	<b>100.0</b>		<b>60,811</b>	<b>100.0</b>		<b>643</b>	<b>100.0</b>		<b>48,271</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	576	79.4	86.0	17,563	28.9	32.6	535	83.2	89.7	14,952	31.0	35.6	
\$100,001 - \$250,000	93	12.8	8.8	15,775	25.9	24.3	67	10.4	6.6	11,398	23.6	22.6	
\$250,001 - \$1 Million	56	7.7	5.1	27,473	45.2	43.1	41	6.4	3.7	21,921	45.4	41.8	
<b>Total</b>	<b>725</b>	<b>100.0</b>	<b>100.0</b>	<b>60,811</b>	<b>100.0</b>	<b>100.0</b>	<b>643</b>	<b>100.0</b>	<b>100.0</b>	<b>48,271</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	289	92.0		6,939	53.3		240	94.1		5,755	61.7		
\$100,001 - \$250,000	17	5.4		3,014	23.2		11	4.3		1,757	18.8		
\$250,001 - \$1 Million	8	2.5		3,066	23.6		4	1.6		1,809	19.4		
<b>Total</b>	<b>314</b>	<b>100.0</b>		<b>13,019</b>	<b>100.0</b>		<b>255</b>	<b>100.0</b>		<b>9,321</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA New York (Group B)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.9	0	0.0	0.5	0.7
Moderate	9	13.4	6.7	505	6.8	4.8	5.0
Middle	45	67.2	74.2	5,121	68.9	71.5	75.0
Upper	13	19.4	18.2	1,811	24.4	23.2	19.3
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	
<b>Total</b>	<b>67</b>	<b>100.0</b>	<b>100.0</b>	<b>7,437</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	1	2.2	0.9	80	1.9	0.6	0.7
Moderate	3	6.5	5.5	147	3.4	4.5	5.0
Middle	29	63.0	70.4	2,637	61.8	64.4	75.0
Upper	13	28.3	23.2	1,404	32.9	30.5	19.3
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	
<b>Total</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>4,268</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.0	0	0.0	0.9	0.7
Moderate	0	0.0	4.5	0	0.0	2.6	5.0
Middle	12	66.7	73.5	458	48.3	75.0	75.0
Upper	6	33.3	21.0	491	51.7	21.5	19.3
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	
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>949</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	8.7	0	0.0	1.5	4.7
Moderate	0	0.0	34.8	0	0.0	19.0	26.5
Middle	0	0.0	56.5	0	0.0	79.5	59.5
Upper	0	0.0	0.0	0	0.0	0.0	9.4
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	1	0.7	0.9	80	0.6	0.6	0.7
Moderate	13	9.0	6.6	717	5.1	5.3	5.0
Middle	98	68.1	73.1	9,452	67.7	69.8	75.0
Upper	32	22.2	19.5	3,706	26.6	24.3	19.3
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	
<b>Total</b>	<b>144</b>	<b>100.0</b>	<b>100.0</b>	<b>13,955</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA New York (Group B)													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%		\$%
<b>Home Purchase Loans</b>													
Low	0	0.0	0.8	0	0.0	0.4	3	2.6	0.9	181	1.2	0.5	0.7
Moderate	5	4.7	7.5	613	4.9	5.7	13	11.4	7.3	1,452	9.9	5.2	5.0
Middle	85	79.4	73.2	9,312	75.1	69.4	86	75.4	74.1	10,633	72.7	70.5	75.0
Upper	17	15.9	18.5	2,482	20.0	24.5	12	10.5	17.7	2,362	16.1	23.7	19.3
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	
<b>Total</b>	<b>107</b>	<b>100.0</b>	<b>100.0</b>	<b>12,407</b>	<b>100.0</b>	<b>100.0</b>	<b>114</b>	<b>100.0</b>	<b>100.0</b>	<b>14,628</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	1.0	0	0.0	1.1	0.7
Moderate	3	5.9	4.1	242	4.1	2.6	2	4.8	4.1	197	3.8	3.2	5.0
Middle	30	58.8	69.0	3,110	52.7	65.1	28	66.7	68.6	3,036	58.9	63.0	75.0
Upper	18	35.3	26.7	2,544	43.1	32.2	12	28.6	26.3	1,925	37.3	32.7	19.3
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	
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>5,896</b>	<b>100.0</b>	<b>100.0</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>5,158</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	0.2	0.7
Moderate	2	10.5	2.8	48	4.4	1.3	1	6.7	2.8	19	2.1	1.4	5.0
Middle	15	78.9	77.0	971	88.4	73.3	11	73.3	72.2	676	73.5	69.0	75.0
Upper	2	10.5	20.2	80	7.3	25.4	3	20.0	24.4	225	24.5	29.3	19.3
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	
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>1,099</b>	<b>100.0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>920</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
Low	0	0.0	5.0	0	0.0	0.2	0	0.0	0.0	0	0.0		0.0
Moderate	0	0.0	5.0	0	0.0	30.3	0	0.0	4.0	0	0.0	3.5	26.5
Middle	1	100.0	70.0	575	100.0	28.0	1	100.0	84.0	250	100.0	76.5	59.5
Upper	0	0.0	20.0	0	0.0	41.5	0	0.0	12.0	0	0.0	20.0	9.4
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>575</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>250</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
Low	0	0.0	0.6	0	0.0	0.3	4	2.2	0.9	279	1.3		0.7
Moderate	13	6.0	5.8	1,098	4.7	6.1	17	9.4	5.6	1,751	8.1	4.3	5.0
Middle	159	74.0	72.2	16,455	71.1	65.3	130	72.2	71.8	14,893	68.7	67.9	75.0
Upper	43	20.0	21.5	5,598	24.2	28.3	29	16.1	21.6	4,761	22.0	27.1	19.3
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	
<b>Total</b>	<b>215</b>	<b>100.0</b>	<b>100.0</b>	<b>23,151</b>	<b>100.0</b>	<b>100.0</b>	<b>180</b>	<b>100.0</b>	<b>100.0</b>	<b>21,684</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA New York (Group B)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	3	4.1	2.4	380	2.8	2.3	2.9
Moderate	9	12.3	8.2	365	2.7	8.9	9.5
Middle	48	65.8	66.1	8,762	64.1	66.2	69.6
Upper	13	17.8	21.4	4,154	30.4	22.0	18.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.0	0	0.0	0.7	
<b>Total</b>	<b>73</b>	<b>100.0</b>	<b>100.0</b>	<b>13,661</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Non-MSA New York (Group B)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	10	4.7	3.2	1,837	7.5	4.5	4	2.5	2.7	576	3.9	4.4	2.7
Moderate	20	9.5	9.0	1,558	6.3	12.7	14	8.8	8.3	1,444	9.9	15.3	9.2
Middle	129	61.1	65.6	14,237	57.8	58.0	104	65.0	67.1	7,916	54.2	56.9	69.7
Upper	52	24.6	21.5	7,002	28.4	24.3	38	23.8	21.4	4,664	31.9	23.1	18.4
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	0.6	0	0.0	0.6	0	0.0	0.7	0	0.0	0.2	
<b>Total</b>	<b>211</b>	<b>100.0</b>	<b>100.0</b>	<b>24,634</b>	<b>100.0</b>	<b>100.0</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>14,600</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Non-MSA New York (Group B)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	9	13.4	6.8	634	8.5	4.1	18.7
<b>Moderate</b>	24	35.8	23.6	2,387	32.1	18.0	16.8
<b>Middle</b>	18	26.9	26.7	2,482	33.4	25.4	22.2
<b>Upper</b>	11	16.4	31.1	1,914	25.7	41.6	42.3
<b>Unknown</b>	5	7.5	11.7	20	0.3	11.0	0.0
<b>Total</b>	67	100.0	100.0	7,437	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	5	10.9	7.7	291	6.8	4.8	18.7
<b>Moderate</b>	11	23.9	18.2	777	18.2	13.0	16.8
<b>Middle</b>	11	23.9	28.5	749	17.5	24.2	22.2
<b>Upper</b>	18	39.1	38.1	2,356	55.2	48.0	42.3
<b>Unknown</b>	1	2.2	7.5	95	2.2	10.0	0.0
<b>Total</b>	46	100.0	100.0	4,268	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	2	11.1	6.2	125	13.2	4.1	18.7
<b>Moderate</b>	3	16.7	20.6	69	7.3	14.1	16.8
<b>Middle</b>	6	33.3	23.0	220	23.2	20.6	22.2
<b>Upper</b>	7	38.9	47.4	535	56.4	59.2	42.3
<b>Unknown</b>	0	0.0	2.7	0	0.0	2.0	0.0
<b>Total</b>	18	100.0	100.0	949	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	16	11.1	6.9	1,050	7.5	4.2	18.7
<b>Moderate</b>	38	26.4	20.8	3,233	23.2	16.0	16.8
<b>Middle</b>	35	24.3	26.2	3,451	24.7	24.4	22.2
<b>Upper</b>	36	25.0	33.9	4,805	34.4	43.3	42.3
<b>Unknown</b>	19	13.2	12.2	1,416	10.1	12.0	0.0
<b>Total</b>	144	100.0	100.0	13,955	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA New York (Group B)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	6	5.6	5.4	414	3.3	3.0	12	10.5	7.9	1,046	7.2	4.5	18.7
Moderate	29	27.1	23.0	2,685	21.6	17.4	37	32.5	24.4	4,341	29.7	18.1	16.8
Middle	32	29.9	24.2	4,574	36.9	22.7	31	27.2	23.8	4,653	31.8	21.8	22.2
Upper	23	21.5	35.3	4,007	32.3	46.6	13	11.4	30.8	3,050	20.9	43.1	42.3
Unknown	17	15.9	12.2	727	5.9	10.3	21	18.4	13.1	1,538	10.5	12.5	0.0
<b>Total</b>	<b>107</b>	<b>100.0</b>	<b>100.0</b>	<b>12,407</b>	<b>100.0</b>	<b>100.0</b>	<b>114</b>	<b>100.0</b>	<b>100.0</b>	<b>14,628</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	4	7.8	3.2	272	4.6	2.0	3	7.1	5.7	298	5.8	3.2	18.7
Moderate	7	13.7	13.7	600	10.2	8.7	9	21.4	17.1	998	19.3	11.7	16.8
Middle	11	21.6	23.8	1,137	19.3	17.7	11	26.2	26.7	1,207	23.4	21.4	22.2
Upper	28	54.9	49.6	3,794	64.3	60.7	17	40.5	40.7	2,397	46.5	51.1	42.3
Unknown	1	2.0	9.7	93	1.6	10.9	2	4.8	9.8	258	5.0	12.6	0.0
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>5,896</b>	<b>100.0</b>	<b>100.0</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>5,158</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	1	5.3	7.0	75	6.8	4.2	0	0.0	4.4	0	0.0	2.2	18.7
Moderate	4	21.1	14.3	233	21.2	8.7	2	13.3	19.4	80	8.7	12.4	16.8
Middle	3	15.8	24.4	95	8.6	22.2	6	40.0	27.5	365	39.7	26.2	22.2
Upper	10	52.6	50.2	671	61.1	59.1	7	46.7	47.8	475	51.6	58.5	42.3
Unknown	1	5.3	4.2	25	2.3	5.9	0	0.0	0.9	0	0.0	0.6	0.0
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>1,099</b>	<b>100.0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>920</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	11	5.1	4.5	761	3.4	2.6	15	8.4	6.8	1,344	6.3	3.9	18.7
Moderate	40	18.7	17.6	3,518	15.6	13.1	48	26.8	20.9	5,419	25.3	15.4	16.8
Middle	46	21.5	22.9	5,806	25.7	20.0	48	26.8	25.1	6,225	29.0	21.7	22.2
Upper	61	28.5	40.2	8,472	37.5	51.5	37	20.7	35.5	5,922	27.6	46.4	42.3
Unknown	56	26.2	14.8	4,019	17.8	12.8	31	17.3	11.7	2,524	11.8	12.6	0.0
<b>Total</b>	<b>214</b>	<b>100.0</b>	<b>100.0</b>	<b>22,576</b>	<b>100.0</b>	<b>100.0</b>	<b>179</b>	<b>100.0</b>	<b>100.0</b>	<b>21,434</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA New York (Group B)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	40	54.8	42.0	2,511	18.4	34.9	89.2
<b>Over \$1 Million</b>	30	41.1		10,009	73.3		8.4
<b>Revenue Unknown</b>	3	4.1		1,141	8.4		2.4
<b>Total</b>	73	100.0		13,661	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	47	64.4	92.9	1,316	9.6	34.6	
<b>\$100,001 - \$250,000</b>	11	15.1	3.7	1,838	13.5	15.5	
<b>\$250,001 - \$1 Million</b>	15	20.5	3.4	10,507	76.9	49.9	
<b>Total</b>	73	100.0	100.0	13,661	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	33	82.5		606	24.1		
<b>\$100,001 - \$250,000</b>	4	10.0		498	19.8		
<b>\$250,001 - \$1 Million</b>	3	7.5		1,407	56.0		
<b>Total</b>	40	100.0		2,511	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA New York (Group B)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	75	35.5	33.8	4,931	20.0	23.4	53	33.1	45.6	3,683	25.2	32.3	89.1
<b>Over \$1 Million</b>	59	28.0		15,236	61.8		32	20.0		6,094	41.7		8.2
<b>Revenue Unknown</b>	77	36.5		4,467	18.1		75	46.9		4,823	33.0		2.7
<b>Total</b>	211	100.0		24,634	100.0		160	100.0		14,600	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	151	71.6	86.9	4,641	18.8	30.0	125	78.1	91.4	4,029	27.6	34.5	
<b>\$100,001 - \$250,000</b>	33	15.6	7.1	5,664	23.0	19.9	20	12.5	5.1	3,230	22.1	20.0	
<b>\$250,001 - \$1 Million</b>	27	12.8	6.0	14,329	58.2	50.1	15	9.4	3.5	7,341	50.3	45.5	
<b>Total</b>	211	100.0	100.0	24,634	100.0	100.0	160	100.0	100.0	14,600	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	65	86.7		1,713	34.7		46	86.8		1,340	36.4		
<b>\$100,001 - \$250,000</b>	6	8.0		962	19.5		2	3.8		236	6.4		
<b>\$250,001 - \$1 Million</b>	4	5.3		2,256	45.8		5	9.4		2,107	57.2		
<b>Total</b>	75	100.0		4,931	100.0		53	100.0		3,683	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA New York (Group C)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	6.7	10.7	104	3.4	8.9	13.2
Middle	16	53.3	59.9	1,698	55.3	60.8	67.2
Upper	12	40.0	29.4	1,269	41.3	30.3	19.6
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	
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>3,071</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	28.6	11.4	200	28.6	8.3	13.2
Middle	5	71.4	66.3	499	71.4	68.2	67.2
Upper	0	0.0	22.3	0	0.0	23.4	19.6
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	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>699</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.3	0	0.0	14.8	13.2
Middle	7	77.8	63.3	316	76.0	48.9	67.2
Upper	2	22.2	23.5	100	24.0	36.3	19.6
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	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>416</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	42.9	0	0.0	81.1	59.3
Middle	0	0.0	42.9	0	0.0	14.9	25.9
Upper	0	0.0	14.3	0	0.0	4.0	14.8
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	7.8	11.3	304	6.3	10.6	13.2
Middle	33	64.7	62.5	3,159	65.4	61.8	67.2
Upper	14	27.5	26.1	1,369	28.3	27.7	19.6
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	
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>4,832</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA New York (Group C)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	11	30.6	12.2	1,217	23.2	10.7	9	19.6	14.0	1,207	16.6	10.9	13.2
Middle	13	36.1	61.9	1,772	33.7	65.1	26	56.5	61.0	3,984	54.9	63.4	67.2
Upper	12	33.3	25.8	2,265	43.1	24.2	11	23.9	25.1	2,063	28.4	25.7	19.6
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	
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>5,254</b>	<b>100.0</b>	<b>100.0</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>7,254</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
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	10.3	0	0.0	9.1	0	0.0	13.5	0	0.0	11.0	13.2
Middle	8	66.7	61.8	1,187	61.5	61.2	7	77.8	61.7	604	53.8	61.5	67.2
Upper	4	33.3	27.9	744	38.5	29.7	2	22.2	24.8	519	46.2	27.5	19.6
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	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>1,931</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,123</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	5.3	0	0.0	4.0	1	11.1	3.9	25	4.2	1.9	13.2
Middle	4	66.7	72.4	307	56.6	74.8	8	88.9	77.5	570	95.8	82.7	67.2
Upper	2	33.3	22.4	235	43.4	21.2	0	0.0	18.6	0	0.0	15.5	19.6
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	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>542</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>595</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	1	100.0	60.0	5,325	100.0	93.8	1	100.0	44.4	330	100.0	53.6	59.3
Middle	0	0.0	40.0	0	0.0	6.2	0	0.0	44.4	0	0.0	38.5	25.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	11.1	0	0.0	7.8	14.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>5,325</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>330</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	14	21.5	11.5	6,777	46.9	11.5	11	15.9	13.5	1,562	16.0	11.4	13.2
Middle	29	44.6	62.3	3,824	26.5	63.2	45	65.2	62.1	5,603	57.5	63.2	67.2
Upper	22	33.8	26.1	3,841	26.6	25.3	13	18.8	24.4	2,582	26.5	25.4	19.6
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	
<b>Total</b>	<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>14,442</b>	<b>100.0</b>	<b>100.0</b>	<b>69</b>	<b>100.0</b>	<b>100.0</b>	<b>9,747</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA New York (Group C)							
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	3	17.6	20.2	112	12.9	19.0	25.7
Middle	11	64.7	52.8	594	68.7	49.8	56.5
Upper	3	17.6	20.1	159	18.4	27.1	17.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	6.9	0	0.0	4.1	
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>865</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Non-MSA New York (Group C)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	22.0	23.3	329	9.9	18.7	7	19.4	21.6	280	10.6	23.5	25.3
Middle	27	65.9	53.5	2,851	85.8	58.4	27	75.0	55.4	2,261	85.4	56.0	56.7
Upper	5	12.2	21.5	144	4.3	21.5	2	5.6	21.3	107	4.0	19.9	18.0
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	1.7	0	0.0	1.4	0	0.0	1.7	0	0.0	0.5	
<b>Total</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>3,324</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>2,648</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Non-MSA New York (Group C)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	2	6.7	2.4	90	2.9	1.2	20.5
Moderate	3	10.0	10.8	392	12.8	6.9	16.5
Middle	10	33.3	25.3	1,371	44.6	21.7	21.3
Upper	9	30.0	50.8	1,198	39.0	58.8	41.7
Unknown	6	20.0	10.8	20	0.7	11.4	0.0
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>3,071</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	3.1	0	0.0	1.7	20.5
Moderate	2	28.6	8.9	200	28.6	5.7	16.5
Middle	2	28.6	21.2	155	22.2	16.5	21.3
Upper	3	42.9	54.6	344	49.2	61.9	41.7
Unknown	0	0.0	12.3	0	0.0	14.2	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>699</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	2	22.2	7.1	50	12.0	3.5	20.5
Moderate	1	11.1	12.2	20	4.8	7.1	16.5
Middle	2	22.2	21.4	90	21.6	11.6	21.3
Upper	4	44.4	55.1	256	61.5	67.8	41.7
Unknown	0	0.0	4.1	0	0.0	10.0	0.0
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>416</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	4	7.8	3.0	140	2.9	1.4	20.5
Moderate	6	11.8	10.6	612	12.7	6.7	16.5
Middle	14	27.5	23.1	1,616	33.4	19.3	21.3
Upper	16	31.4	50.4	1,798	37.2	58.4	41.7
Unknown	11	21.6	13.0	666	13.8	14.2	0.0
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>4,832</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA New York (Group C)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	5.6	2.2	84	1.6	0.9	1	2.2	2.2	133	1.8	1.1	20.5
Moderate	5	13.9	10.4	469	8.9	6.5	0	0.0	11.4	0	0.0	7.5	16.5
Middle	9	25.0	18.8	1,386	26.4	16.0	13	28.3	20.3	2,319	32.0	16.4	21.3
Upper	13	36.1	59.1	2,589	49.3	68.9	16	34.8	56.1	4,099	56.5	65.9	41.7
Unknown	7	19.4	9.5	726	13.8	7.8	16	34.8	10.0	703	9.7	9.2	0.0
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>5,254</b>	<b>100.0</b>	<b>100.0</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>7,254</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.3	0	0.0	1.4	1	11.1	3.4	25	2.2	1.8	20.5
Moderate	1	8.3	7.6	210	10.9	4.9	0	0.0	10.0	0	0.0	6.8	16.5
Middle	0	0.0	18.0	0	0.0	13.4	3	33.3	19.9	427	38.0	16.5	21.3
Upper	11	91.7	61.2	1,721	89.1	67.4	5	55.6	55.7	671	59.8	63.0	41.7
Unknown	0	0.0	10.9	0	0.0	12.9	0	0.0	11.1	0	0.0	12.0	0.0
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>1,931</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,123</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	6.9	0	0.0	5.8	20.5
Moderate	1	16.7	5.3	45	8.3	2.6	0	0.0	9.8	0	0.0	3.9	16.5
Middle	0	0.0	19.7	0	0.0	14.1	3	33.3	23.5	167	28.1	19.9	21.3
Upper	5	83.3	75.0	497	91.7	83.3	6	66.7	57.8	428	71.9	66.2	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.0	0	0.0	4.2	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>542</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>595</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	2	3.1	2.2	84	0.9	1.1	2	2.9	2.8	158	1.7	1.4	20.5
Moderate	7	10.9	8.9	724	7.9	5.7	0	0.0	10.7	0	0.0	7.1	16.5
Middle	9	14.1	17.8	1,386	15.2	14.6	19	27.9	20.0	2,913	30.9	16.2	21.3
Upper	29	45.3	58.3	4,807	52.7	67.2	27	39.7	55.7	5,198	55.2	65.1	41.7
Unknown	17	26.6	12.8	2,116	23.2	11.4	20	29.4	10.8	1,148	12.2	10.3	0.0
<b>Total</b>	<b>64</b>	<b>100.0</b>	<b>100.0</b>	<b>9,117</b>	<b>100.0</b>	<b>100.0</b>	<b>68</b>	<b>100.0</b>	<b>100.0</b>	<b>9,417</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA New York (Group C)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
\$1 Million or Less	13	76.5	40.2	265	30.6	27.9	90.8
Over \$1 Million	4	23.5		600	69.4		6.8
Revenue Unknown	0	0.0		0	0.0		2.4
<b>Total</b>	<b>17</b>	<b>100.0</b>		<b>865</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	16	94.1	97.9	465	53.8	62.5	
\$100,001 - \$250,000	0	0.0	1.1	0	0.0	9.6	
\$250,001 - \$1 Million	1	5.9	1.0	400	46.2	27.9	
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>865</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	13	100.0		265	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>13</b>	<b>100.0</b>		<b>265</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA New York (Group C)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	15	36.6	31.0	301	9.1	21.5	18	50.0	42.7	586	22.1	24.0	91.1
Over \$1 Million	8	19.5		2,388	71.8		9	25.0		1,668	63.0		6.5
Revenue Unknown	18	43.9		635	19.1		9	25.0		394	14.9		2.4
<b>Total</b>	<b>41</b>	<b>100.0</b>		<b>3,324</b>	<b>100.0</b>		<b>36</b>	<b>100.0</b>		<b>2,648</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	33	80.5	94.0	848	25.5	44.0	29	80.6	96.1	742	28.0	55.6	
\$100,001 - \$250,000	5	12.2	3.5	863	26.0	16.7	4	11.1	2.5	591	22.3	17.5	
\$250,001 - \$1 Million	3	7.3	2.5	1,613	48.5	39.4	3	8.3	1.4	1,315	49.7	26.9	
<b>Total</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>3,324</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>2,648</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	15	100.0		301	100.0		17	94.4		289	49.3		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	5.6		297	50.7		
<b>Total</b>	<b>15</b>	<b>100.0</b>		<b>301</b>	<b>100.0</b>		<b>18</b>	<b>100.0</b>		<b>586</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 25420 (Harrisburg-Carlisle, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	1	1.8	2.9	88	0.8	1.7	3.0
Moderate	13	22.8	14.0	1,376	12.5	8.9	12.8
Middle	23	40.4	50.4	4,654	42.3	48.6	54.8
Upper	20	35.1	32.7	4,880	44.4	40.8	29.4
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	
<b>Total</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>10,998</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	6	5.8	1.3	529	4.8	0.8	3.0
Moderate	11	10.6	8.9	751	6.7	5.5	12.8
Middle	52	50.0	53.7	5,637	50.6	49.9	54.8
Upper	35	33.7	36.1	4,218	37.9	43.7	29.4
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	
<b>Total</b>	<b>104</b>	<b>100.0</b>	<b>100.0</b>	<b>11,135</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	1.6	1.6	50	1.3	1.4	3.0
Moderate	8	13.1	8.9	435	11.7	6.3	12.8
Middle	31	50.8	55.6	1,934	51.9	55.2	54.8
Upper	21	34.4	33.9	1,307	35.1	37.2	29.4
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	
<b>Total</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>3,726</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	3	37.5	23.3	1,248	2.3	19.1	10.9
Moderate	1	12.5	33.0	50	0.1	11.7	29.4
Middle	3	37.5	33.0	51,910	96.6	49.7	47.4
Upper	1	12.5	10.7	540	1.0	19.6	12.3
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	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>53,748</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	11	4.5	2.3	1,915	2.4	2.7	3.0
Moderate	37	15.2	11.8	2,918	3.6	8.0	12.8
Middle	117	48.0	52.3	65,116	80.1	49.5	54.8
Upper	79	32.4	33.5	11,329	13.9	39.8	29.4
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	
<b>Total</b>	<b>244</b>	<b>100.0</b>	<b>100.0</b>	<b>81,278</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 25420 (Harrisburg-Carlisle, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	7	8.6	3.4	638	4.5	2.0	6	7.9	4.2	753	5.7	2.3	3.0
Moderate	11	13.6	13.7	1,571	11.1	8.7	19	25.0	14.5	2,126	16.2	9.1	12.8
Middle	40	49.4	49.9	7,270	51.3	48.6	33	43.4	49.6	5,973	45.5	48.6	54.8
Upper	23	28.4	32.9	4,704	33.2	40.7	18	23.7	31.8	4,278	32.6	40.0	29.4
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	
<b>Total</b>	<b>81</b>	<b>100.0</b>	<b>100.0</b>	<b>14,183</b>	<b>100.0</b>	<b>100.0</b>	<b>76</b>	<b>100.0</b>	<b>100.0</b>	<b>13,130</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	5	3.9	1.3	515	2.7	0.7	3	2.0	1.8	289	1.5	1.1	3.0
Moderate	16	12.4	7.2	1,387	7.2	4.4	16	10.9	8.9	1,621	8.2	5.7	12.8
Middle	68	52.7	50.2	10,894	56.8	47.2	85	57.8	52.3	11,269	57.2	49.6	54.8
Upper	40	31.0	41.3	6,400	33.3	47.6	43	29.3	37.1	6,507	33.1	43.6	29.4
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	
<b>Total</b>	<b>129</b>	<b>100.0</b>	<b>100.0</b>	<b>19,196</b>	<b>100.0</b>	<b>100.0</b>	<b>147</b>	<b>100.0</b>	<b>100.0</b>	<b>19,686</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	1	1.9	1.3	100	1.9	1.1	1	2.0	1.3	25	0.7	0.7	3.0
Moderate	2	3.8	8.7	61	1.1	5.3	6	11.8	9.9	160	4.5	6.5	12.8
Middle	28	52.8	53.3	2,202	41.4	48.6	29	56.9	53.5	2,300	65.3	50.8	54.8
Upper	22	41.5	36.7	2,953	55.5	45.0	15	29.4	35.3	1,039	29.5	42.0	29.4
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	
<b>Total</b>	<b>53</b>	<b>100.0</b>	<b>100.0</b>	<b>5,316</b>	<b>100.0</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>3,524</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	4	66.7	20.0	817	61.1	4.6	1	25.0	20.2	260	8.3	5.1	
Moderate	1	16.7	27.7	120	9.0	25.3	2	50.0	36.8	1,150	36.7	33.4	29.4
Middle	1	16.7	42.3	400	29.9	42.2	0	0.0	33.1	0	0.0	45.3	47.4
Upper	0	0.0	10.0	0	0.0	27.9	1	25.0	9.8	1,725	55.0	16.1	12.3
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	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,337</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>3,135</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	20	6.6	2.3	2,182	5.0	1.5	13	4.5	2.7	1,464	3.6	1.9	
Moderate	41	13.6	10.2	4,037	9.3	7.4	45	15.6	11.3	5,192	12.8	9.3	12.8
Middle	154	51.0	50.4	22,935	52.7	47.6	154	53.3	51.3	20,298	50.1	48.9	54.8
Upper	87	28.8	37.1	14,335	33.0	43.5	77	26.6	34.6	13,549	33.5	39.9	29.4
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	
<b>Total</b>	<b>302</b>	<b>100.0</b>	<b>100.0</b>	<b>43,489</b>	<b>100.0</b>	<b>100.0</b>	<b>289</b>	<b>100.0</b>	<b>100.0</b>	<b>40,503</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 25420 (Harrisburg-Carlisle, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Low	12	4.8	3.7	683	1.9	3.7	5.4
Moderate	32	12.9	15.8	2,949	8.3	15.5	18.0
Middle	134	53.8	54.4	21,767	61.5	59.8	52.7
Upper	71	28.5	25.6	10,012	28.3	20.9	23.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.5	0	0.0	0.1	
<b>Total</b>	<b>249</b>	<b>100.0</b>	<b>100.0</b>	<b>35,411</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 25420 (Harrisburg-Carlisle, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	40	5.9	4.6	3,088	3.8	3.8	24	5.3	4.9	1,592	3.6	3.8	5.7
Moderate	143	21.0	17.0	20,195	25.0	17.8	86	18.9	16.2	7,676	17.3	17.0	17.8
Middle	348	51.2	52.7	39,738	49.1	55.4	230	50.7	53.5	22,899	51.7	57.1	52.7
Upper	149	21.9	25.5	17,894	22.1	22.9	114	25.1	25.2	12,116	27.4	22.0	23.9
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	0.2	0	0.0	0.1	0	0.0	0.3	0	0.0	0.0	
<b>Total</b>	<b>680</b>	<b>100.0</b>	<b>100.0</b>	<b>80,915</b>	<b>100.0</b>	<b>100.0</b>	<b>454</b>	<b>100.0</b>	<b>100.0</b>	<b>44,283</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 25420 (Harrisburg-Carlisle, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	11	19.3	10.2	1,179	10.7	6.1	19.8
<b>Moderate</b>	19	33.3	25.9	3,183	28.9	20.5	18.0
<b>Middle</b>	4	7.0	23.3	494	4.5	22.9	21.7
<b>Upper</b>	16	28.1	29.8	4,723	42.9	40.7	40.6
<b>Unknown</b>	7	12.3	10.8	1,419	12.9	9.8	0.0
<b>Total</b>	57	100.0	100.0	10,998	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	17	16.3	8.7	1,454	13.1	4.9	19.8
<b>Moderate</b>	32	30.8	18.5	2,635	23.7	13.0	18.0
<b>Middle</b>	25	24.0	21.7	2,908	26.1	18.4	21.7
<b>Upper</b>	27	26.0	36.0	3,737	33.6	45.2	40.6
<b>Unknown</b>	3	2.9	15.1	401	3.6	18.5	0.0
<b>Total</b>	104	100.0	100.0	11,135	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	7	11.5	7.8	509	13.7	5.3	19.8
<b>Moderate</b>	16	26.2	17.8	574	15.4	13.7	18.0
<b>Middle</b>	23	37.7	27.2	1,134	30.4	23.8	21.7
<b>Upper</b>	13	21.3	45.2	1,384	37.1	53.5	40.6
<b>Unknown</b>	2	3.3	2.0	125	3.4	3.7	0.0
<b>Total</b>	61	100.0	100.0	3,726	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	35	14.8	9.3	3,142	11.4	5.6	19.8
<b>Moderate</b>	67	28.4	22.1	6,392	23.2	17.5	18.0
<b>Middle</b>	52	22.0	23.0	4,536	16.5	21.2	21.7
<b>Upper</b>	56	23.7	33.5	9,844	35.8	42.4	40.6
<b>Unknown</b>	26	11.0	12.1	3,616	13.1	13.2	0.0
<b>Total</b>	236	100.0	100.0	27,530	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 25420 (Harrisburg-Carlisle, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	17	21.0	12.5	2,132	15.0	7.8	13	17.1	11.0	1,794	13.7	6.7	19.8
Moderate	14	17.3	25.0	2,520	17.8	20.3	22	28.9	23.0	3,560	27.1	18.2	18.0
Middle	24	29.6	22.0	4,612	32.5	22.2	10	13.2	21.8	1,904	14.5	21.5	21.7
Upper	13	16.0	28.3	2,917	20.6	38.1	20	26.3	27.9	4,843	36.9	37.5	40.6
Unknown	13	16.0	12.2	2,002	14.1	11.6	11	14.5	16.3	1,029	7.8	16.1	0.0
<b>Total</b>	<b>81</b>	<b>100.0</b>	<b>100.0</b>	<b>14,183</b>	<b>100.0</b>	<b>100.0</b>	<b>76</b>	<b>100.0</b>	<b>100.0</b>	<b>13,130</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	16	12.4	5.6	1,282	6.7	3.0	24	16.3	6.8	1,855	9.4	4.1	19.8
Moderate	25	19.4	15.2	2,514	13.1	10.7	49	33.3	17.1	5,303	26.9	12.5	18.0
Middle	44	34.1	21.2	5,474	28.5	18.6	24	16.3	21.3	3,368	17.1	19.0	21.7
Upper	41	31.8	38.9	9,361	48.8	47.3	41	27.9	34.8	7,731	39.3	43.0	40.6
Unknown	3	2.3	19.2	565	2.9	20.5	9	6.1	19.9	1,429	7.3	21.4	0.0
<b>Total</b>	<b>129</b>	<b>100.0</b>	<b>100.0</b>	<b>19,196</b>	<b>100.0</b>	<b>100.0</b>	<b>147</b>	<b>100.0</b>	<b>100.0</b>	<b>19,686</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	13	24.5	6.6	810	15.2	5.0	11	21.6	8.0	333	9.4	6.3	19.8
Moderate	9	17.0	18.4	565	10.6	14.4	10	19.6	16.9	667	18.9	14.2	18.0
Middle	6	11.3	23.5	578	10.9	19.1	10	19.6	24.3	979	27.8	20.4	21.7
Upper	22	41.5	49.9	2,929	55.1	58.9	19	37.3	49.4	1,445	41.0	56.9	40.6
Unknown	3	5.7	1.6	434	8.2	2.6	1	2.0	1.5	100	2.8	2.2	0.0
<b>Total</b>	<b>53</b>	<b>100.0</b>	<b>100.0</b>	<b>5,316</b>	<b>100.0</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>3,524</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	46	15.5	8.2	4,224	10.0	5.0	48	16.8	8.6	3,982	10.7	5.3	19.8
Moderate	48	16.2	18.8	5,599	13.3	14.6	81	28.4	19.2	9,530	25.5	15.0	18.0
Middle	74	25.0	21.3	10,664	25.3	19.8	44	15.4	21.7	6,251	16.7	20.1	21.7
Upper	76	25.7	35.0	15,207	36.1	43.2	80	28.1	33.4	14,019	37.5	41.0	40.6
Unknown	52	17.6	16.6	6,458	15.3	17.3	32	11.2	17.1	3,586	9.6	18.6	0.0
<b>Total</b>	<b>296</b>	<b>100.0</b>	<b>100.0</b>	<b>42,152</b>	<b>100.0</b>	<b>100.0</b>	<b>285</b>	<b>100.0</b>	<b>100.0</b>	<b>37,368</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 25420 (Harrisburg-Carlisle, PA)													
	Bank And Aggregate Loans						Total Businesses %						
	Bank		Agg	Bank		Agg							
	#	%	%	\$(000)	%	%							
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	168	67.5	44.3	12,946	36.6	33.5	89.8						
<b>Over \$1 Million</b>	75	30.1		19,123	54.0		8.6						
<b>Revenue Unknown</b>	6	2.4		3,342	9.4		1.6						
<b>Total</b>	249	100.0		35,411	100.0		100.0						
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	176	70.7	90.0	4,450	12.6	30.0							
<b>\$100,001 - \$250,000</b>	31	12.4	5.1	5,315	15.0	16.9							
<b>\$250,001 - \$1 Million</b>	42	16.9	4.9	25,646	72.4	53.1							
<b>Total</b>	249	100.0	100.0	35,411	100.0	100.0							
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	138	82.1		2,739	21.2								
<b>\$100,001 - \$250,000</b>	15	8.9		2,418	18.7								
<b>\$250,001 - \$1 Million</b>	15	8.9		7,789	60.2								
<b>Total</b>	168	100.0		12,946	100.0								
Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 25420 (Harrisburg-Carlisle, PA)													
	Bank And Aggregate Loans By Year												
	2020						2021						Total Businesses %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	301	44.3	36.0	22,213	27.5	22.3	168	37.0	40.6	11,432	25.8	25.5	90.0
<b>Over \$1 Million</b>	178	26.2		37,608	46.5		108	23.8		24,513	55.4		8.3
<b>Revenue Unknown</b>	201	29.6		21,094	26.1		178	39.2		8,338	18.8		1.7
<b>Total</b>	680	100.0		80,915	100.0		454	100.0		44,283	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	463	68.1	83.4	15,385	19.0	26.7	338	74.4	89.2	10,387	23.5	32.7	
<b>\$100,001 - \$250,000</b>	118	17.4	9.2	19,282	23.8	21.1	67	14.8	6.7	10,702	24.2	23.0	
<b>\$250,001 - \$1 Million</b>	99	14.6	7.4	46,248	57.2	52.2	49	10.8	4.2	23,194	52.4	44.4	
<b>Total</b>	680	100.0	100.0	80,915	100.0	100.0	454	100.0	100.0	44,283	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	257	85.4		6,961	31.3		147	87.5		4,290	37.5		
<b>\$100,001 - \$250,000</b>	23	7.6		3,892	17.5		9	5.4		1,282	11.2		
<b>\$250,001 - \$1 Million</b>	21	7.0		11,360	51.1		12	7.1		5,860	51.3		
<b>Total</b>	301	100.0		22,213	100.0		168	100.0		11,432	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 49620 (York-Hanover, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	1	0.7	3.1	103	0.4	1.3	3.3
Moderate	6	3.9	6.8	800	3.1	4.3	6.2
Middle	110	71.9	69.8	17,723	68.1	69.4	70.9
Upper	36	23.5	20.3	7,400	28.4	25.1	19.6
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	
<b>Total</b>	<b>153</b>	<b>100.0</b>	<b>100.0</b>	<b>26,026</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	7	2.2	1.6	271	0.8	0.7	3.3
Moderate	16	5.1	4.2	1,026	2.9	2.8	6.2
Middle	225	71.7	71.2	25,106	71.5	68.7	70.9
Upper	66	21.0	23.0	8,729	24.8	27.8	19.6
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	
<b>Total</b>	<b>314</b>	<b>100.0</b>	<b>100.0</b>	<b>35,132</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	0.8	2.2	50	0.7	1.6	3.3
Moderate	5	4.2	4.1	310	4.3	3.2	6.2
Middle	90	76.3	70.4	5,807	79.8	69.9	70.9
Upper	22	18.6	23.3	1,114	15.3	25.3	19.6
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	
<b>Total</b>	<b>118</b>	<b>100.0</b>	<b>100.0</b>	<b>7,281</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	1	11.1	23.4	793	2.7	8.9	17.8
Moderate	2	22.2	13.8	605	2.1	4.2	7.2
Middle	5	55.6	57.4	27,791	94.4	81.1	70.3
Upper	1	11.1	5.3	251	0.9	5.8	4.6
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	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>29,440</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	10	1.6	2.6	1,217	1.2	1.5	3.3
Moderate	35	5.6	5.9	3,272	3.2	3.8	6.2
Middle	445	71.8	70.4	78,371	77.4	69.9	70.9
Upper	130	21.0	21.1	18,449	18.2	24.7	19.6
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	
<b>Total</b>	<b>620</b>	<b>100.0</b>	<b>100.0</b>	<b>101,309</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 49620 (York-Hanover, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	8	4.5	3.6	780	2.4	1.5	15	8.7	4.3	1,388	4.5	2.0	3.3
Moderate	13	7.3	6.5	1,624	5.0	4.4	22	12.7	7.4	2,875	9.4	4.7	6.2
Middle	119	66.5	67.9	19,847	61.1	66.6	112	64.7	69.1	20,627	67.3	69.1	70.9
Upper	39	21.8	22.1	10,219	31.5	27.5	24	13.9	19.3	5,774	18.8	24.1	19.6
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	179	100.0	100.0	32,470	100.0	100.0	173	100.0	100.0	30,664	100.0	100.0	100.0
<b>Refinance Loans</b>													
Low	3	0.9	0.9	215	0.5	0.4	7	2.1	2.0	681	1.3	1.0	3.3
Moderate	14	4.3	3.1	1,110	2.4	2.0	12	3.6	3.9	1,143	2.2	2.7	6.2
Middle	246	75.0	68.4	33,732	72.4	65.6	241	71.7	69.0	34,702	66.0	66.3	70.9
Upper	65	19.8	27.6	11,528	24.7	32.0	76	22.6	25.1	16,037	30.5	30.0	19.6
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	328	100.0	100.0	46,585	100.0	100.0	336	100.0	100.0	52,563	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
Low	1	0.8	1.8	85	1.0	1.3	2	1.5	2.1	65	0.7	1.8	3.3
Moderate	4	3.3	4.7	365	4.3	3.7	3	2.2	4.4	155	1.7	3.0	6.2
Middle	96	79.3	70.4	6,464	75.5	68.5	93	68.9	69.6	5,838	65.6	66.0	70.9
Upper	20	16.5	23.2	1,649	19.3	26.6	37	27.4	23.9	2,837	31.9	29.2	19.6
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	121	100.0	100.0	8,563	100.0	100.0	135	100.0	100.0	8,895	100.0	100.0	100.0
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	1	14.3	28.1	106	0.2	15.2	1	50.0	35.7	280	1.8	7.9	
Moderate	0	0.0	12.4	0	0.0	7.6	0	0.0	13.4	0	0.0	6.9	7.2
Middle	6	85.7	57.3	45,267	99.8	73.3	0	0.0	46.4	0	0.0	79.1	70.3
Upper	0	0.0	2.2	0	0.0	4.0	1	50.0	4.5	15,000	98.2	6.1	4.6
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	7	100.0	100.0	45,373	100.0	100.0	2	100.0	100.0	15,280	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	14	2.1	2.3	1,223	0.9	1.5	26	3.9	3.1	2,454	2.2	1.9	
Moderate	37	5.5	4.8	3,712	2.7	3.3	38	5.7	5.4	4,281	3.9	3.9	6.2
Middle	495	73.2	68.4	109,224	78.7	66.4	460	69.3	69.2	63,095	57.5	68.5	70.9
Upper	130	19.2	24.6	24,671	17.8	28.7	140	21.1	22.3	39,874	36.3	25.7	19.6
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	676	100.0	100.0	138,830	100.0	100.0	664	100.0	100.0	109,704	100.0	100.0	100.0

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 49620 (York-Hanover, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	34	7.1	6.7	6,141	10.6	8.1	8.8
Moderate	25	5.2	5.4	4,203	7.2	6.5	6.5
Middle	315	65.5	67.7	36,708	63.2	65.9	67.1
Upper	107	22.2	19.5	10,993	18.9	19.3	17.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.2	
<b>Total</b>	<b>481</b>	<b>100.0</b>	<b>100.0</b>	<b>58,045</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 49620 (York-Hanover, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	87	8.5	7.6	9,396	9.0	8.7	45	6.9	7.6	4,262	6.9	8.6	8.8
Moderate	76	7.4	6.7	7,010	6.7	8.4	37	5.7	6.1	3,069	5.0	7.1	6.6
Middle	651	63.8	65.6	65,199	62.5	62.3	428	65.6	65.6	40,013	64.7	62.3	66.6
Upper	207	20.3	19.9	22,759	21.8	20.6	142	21.8	20.5	14,502	23.4	22.0	18.0
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	0.1	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>1,021</b>	<b>100.0</b>	<b>100.0</b>	<b>104,364</b>	<b>100.0</b>	<b>100.0</b>	<b>652</b>	<b>100.0</b>	<b>100.0</b>	<b>61,846</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 49620 (York-Hanover, PA)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	15	9.8	8.5	1,622	6.2	4.8	19.4
Moderate	39	25.5	22.5	5,308	20.4	17.7	18.4
Middle	39	25.5	23.9	7,360	28.3	23.6	22.3
Upper	50	32.7	31.2	10,198	39.2	40.9	39.9
Unknown	10	6.5	13.9	1,538	5.9	13.0	0.0
<b>Total</b>	<b>153</b>	<b>100.0</b>	<b>100.0</b>	<b>26,026</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	41	13.1	8.3	2,666	7.6	4.4	19.4
Moderate	79	25.2	17.5	6,855	19.5	12.1	18.4
Middle	78	24.8	21.5	8,924	25.4	18.9	22.3
Upper	102	32.5	36.4	14,529	41.4	43.8	39.9
Unknown	14	4.5	16.3	2,158	6.1	20.8	0.0
<b>Total</b>	<b>314</b>	<b>100.0</b>	<b>100.0</b>	<b>35,132</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	13	11.0	7.9	660	9.1	7.5	19.4
Moderate	24	20.3	17.5	1,335	18.3	14.9	18.4
Middle	29	24.6	24.4	1,707	23.4	22.7	22.3
Upper	49	41.5	47.8	3,461	47.5	51.5	39.9
Unknown	3	2.5	2.2	118	1.6	3.3	0.0
<b>Total</b>	<b>118</b>	<b>100.0</b>	<b>100.0</b>	<b>7,281</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	69	11.3	8.2	4,948	6.9	4.7	19.4
Moderate	142	23.2	20.1	13,498	18.8	15.6	18.4
Middle	146	23.9	22.8	17,991	25.0	21.7	22.3
Upper	201	32.9	34.0	28,188	39.2	41.6	39.9
Unknown	53	8.7	14.9	7,244	10.1	16.4	0.0
<b>Total</b>	<b>611</b>	<b>100.0</b>	<b>100.0</b>	<b>71,869</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 49620 (York-Hanover, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	30	16.8	10.5	3,548	10.9	6.2	41	23.7	9.1	4,507	14.7	5.2	19.4
Moderate	48	26.8	24.8	7,375	22.7	20.2	50	28.9	23.6	8,104	26.4	18.6	18.4
Middle	35	19.6	23.3	5,615	17.3	23.5	30	17.3	22.8	5,390	17.6	23.1	22.3
Upper	53	29.6	27.5	13,354	41.1	36.7	38	22.0	26.7	10,339	33.7	35.5	39.9
Unknown	13	7.3	14.0	2,578	7.9	13.4	14	8.1	17.8	2,324	7.6	17.7	0.0
<b>Total</b>	<b>179</b>	<b>100.0</b>	<b>100.0</b>	<b>32,470</b>	<b>100.0</b>	<b>100.0</b>	<b>173</b>	<b>100.0</b>	<b>100.0</b>	<b>30,664</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	33	10.1	5.0	2,530	5.4	2.7	39	11.6	5.2	3,301	6.3	2.9	19.4
Moderate	68	20.7	14.1	7,440	16.0	10.0	76	22.6	16.7	9,642	18.3	12.7	18.4
Middle	91	27.7	21.4	12,007	25.8	18.9	77	22.9	22.8	11,417	21.7	20.7	22.3
Upper	115	35.1	37.9	21,421	46.0	44.6	131	39.0	34.5	25,615	48.7	41.6	39.9
Unknown	21	6.4	21.5	3,187	6.8	23.8	13	3.9	20.7	2,588	4.9	22.1	0.0
<b>Total</b>	<b>328</b>	<b>100.0</b>	<b>100.0</b>	<b>46,585</b>	<b>100.0</b>	<b>100.0</b>	<b>336</b>	<b>100.0</b>	<b>100.0</b>	<b>52,563</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	15	12.4	9.1	800	9.3	7.4	15	11.1	8.4	702	7.9	6.7	19.4
Moderate	24	19.8	17.3	1,494	17.4	14.6	25	18.5	17.9	1,519	17.1	15.2	18.4
Middle	39	32.2	25.9	3,132	36.6	23.0	28	20.7	22.3	2,019	22.7	20.1	22.3
Upper	42	34.7	45.5	2,862	33.4	51.3	59	43.7	49.0	4,269	48.0	54.3	39.9
Unknown	1	0.8	2.2	275	3.2	3.7	8	5.9	2.4	386	4.3	3.6	0.0
<b>Total</b>	<b>121</b>	<b>100.0</b>	<b>100.0</b>	<b>8,563</b>	<b>100.0</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>100.0</b>	<b>8,895</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	78	11.7	7.4	6,878	7.4	4.3	95	14.4	7.0	8,510	9.0	4.1	19.4
Moderate	140	20.9	18.4	16,309	17.5	14.5	151	22.8	19.4	19,265	20.4	15.5	18.4
Middle	165	24.7	21.9	20,754	22.2	20.7	135	20.4	22.8	18,826	19.9	21.7	22.3
Upper	210	31.4	33.1	37,637	40.3	40.2	228	34.4	32.2	40,223	42.6	38.9	39.9
Unknown	76	11.4	19.1	11,879	12.7	20.3	53	8.0	18.5	7,600	8.0	19.9	0.0
<b>Total</b>	<b>669</b>	<b>100.0</b>	<b>100.0</b>	<b>93,457</b>	<b>100.0</b>	<b>100.0</b>	<b>662</b>	<b>100.0</b>	<b>100.0</b>	<b>94,424</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 49620 (York-Hanover, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	308	64.0	48.9	16,312	28.1	39.2	90.8
<b>Over \$1 Million</b>	162	33.7		40,604	70.0		8.0
<b>Revenue Unknown</b>	11	2.3		1,129	1.9		1.2
<b>Total</b>	481	100.0		58,045	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	362	75.3	92.0	10,408	17.9	32.7	
<b>\$100,001 - \$250,000</b>	51	10.6	4.0	9,734	16.8	16.7	
<b>\$250,001 - \$1 Million</b>	68	14.1	4.0	37,903	65.3	50.6	
<b>Total</b>	481	100.0	100.0	58,045	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	275	89.3		6,199	38.0		
<b>\$100,001 - \$250,000</b>	18	5.8		2,992	18.3		
<b>\$250,001 - \$1 Million</b>	15	4.9		7,121	43.7		
<b>Total</b>	308	100.0		16,312	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 49620 (York-Hanover, PA)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	473	46.3	44.4	27,068	25.9	32.6	240	36.8	48.7	16,261	26.3	33.0	91.2
<b>Over \$1 Million</b>	271	26.5		62,492	59.9		162	24.8		34,978	56.6		7.6
<b>Revenue Unknown</b>	277	27.1		14,804	14.2		250	38.3		10,607	17.2		1.3
<b>Total</b>	1,021	100.0		104,364	100.0		652	100.0		61,846	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	756	74.0	86.2	22,514	21.6	29.9	493	75.6	90.1	14,293	23.1	32.6	
<b>\$100,001 - \$250,000</b>	143	14.0	7.5	22,391	21.5	19.9	98	15.0	5.8	16,301	26.4	21.6	
<b>\$250,001 - \$1 Million</b>	122	11.9	6.3	59,459	57.0	50.2	61	9.4	4.1	31,252	50.5	45.8	
<b>Total</b>	1,021	100.0	100.0	104,364	100.0	100.0	652	100.0	100.0	61,846	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	422	89.2		11,004	40.7		207	86.3		5,825	35.8		
<b>\$100,001 - \$250,000</b>	26	5.5		4,367	16.1		20	8.3		3,150	19.4		
<b>\$250,001 - \$1 Million</b>	25	5.3		11,697	43.2		13	5.4		7,286	44.8		
<b>Total</b>	473	100.0		27,068	100.0		240	100.0		16,261	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 11020 (Altoona, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	4.3	3.3	61	1.7	1.7	3.1
Moderate	1	4.3	11.3	57	1.5	7.0	9.0
Middle	17	73.9	74.2	3,023	81.9	73.0	77.6
Upper	4	17.4	11.2	552	14.9	18.2	10.2
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	
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>3,693</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	5.0	1.8	123	3.6	1.1	3.1
Moderate	4	10.0	7.1	353	10.5	4.7	9.0
Middle	31	77.5	76.3	2,596	76.9	73.0	77.6
Upper	3	7.5	14.7	303	9.0	21.2	10.2
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	
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>3,375</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	3.6	2.3	50	3.9	1.5	3.1
Moderate	3	10.7	8.4	105	8.2	6.2	9.0
Middle	16	57.1	77.3	605	47.3	78.4	77.6
Upper	8	28.6	11.9	520	40.6	14.0	10.2
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	
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>1,280</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	9.7	0	0.0	5.2	21.4
Moderate	0	0.0	38.7	0	0.0	33.4	8.1
Middle	2	100.0	48.4	153	100.0	59.6	67.0
Upper	0	0.0	3.2	0	0.0	1.7	3.5
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	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>153</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	4	4.2	2.8	234	2.7	1.6	3.1
Moderate	8	8.3	9.9	515	5.9	7.0	9.0
Middle	69	71.9	75.2	6,669	75.8	73.2	77.6
Upper	15	15.6	12.2	1,375	15.6	18.2	10.2
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	
<b>Total</b>	<b>96</b>	<b>100.0</b>	<b>100.0</b>	<b>8,793</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 11020 (Altoona, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	1	1.8	2.2	91	1.2	0.9	1	2.4	3.4	75	1.3	1.6	3.1
Moderate	4	7.3	10.3	430	5.7	6.2	3	7.1	10.5	326	5.8	6.7	9.0
Middle	43	78.2	76.4	5,391	71.9	75.8	33	78.6	74.5	4,244	76.1	75.4	77.6
Upper	7	12.7	11.1	1,583	21.1	17.1	5	11.9	11.6	935	16.8	16.3	10.2
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	55	100.0	100.0	7,495	100.0	100.0	42	100.0	100.0	5,580	100.0	100.0	100.0
<b>Refinance Loans</b>													
Low	1	2.0	1.2	75	1.0	0.6	0	0.0	0.9	0	0.0	0.9	3.1
Moderate	3	6.1	5.5	235	3.2	4.0	6	9.5	5.8	382	5.0	3.5	9.0
Middle	40	81.6	76.9	5,508	74.3	73.0	45	71.4	77.9	5,376	70.9	75.8	77.6
Upper	5	10.2	16.5	1,591	21.5	22.3	12	19.0	15.4	1,822	24.0	19.8	10.2
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	49	100.0	100.0	7,409	100.0	100.0	63	100.0	100.0	7,580	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
Low	0	0.0	2.8	0	0.0	2.0	2	7.1	1.7	66	5.1	1.6	3.1
Moderate	4	9.8	6.8	161	7.8	5.1	2	7.1	7.6	68	5.3	4.9	9.0
Middle	33	80.5	76.9	1,649	79.6	72.3	18	64.3	77.9	726	56.1	76.8	77.6
Upper	4	9.8	13.5	261	12.6	20.6	6	21.4	12.8	434	33.5	16.7	10.2
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	41	100.0	100.0	2,071	100.0	100.0	28	100.0	100.0	1,294	100.0	100.0	100.0
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	16.2	0	0.0	8.6	0	0.0	15.8	0	0.0	4.2	21.4
Moderate	0	0.0	13.5	0	0.0	3.0	0	0.0	21.1	0	0.0	8.0	8.1
Middle	0	0.0	64.9	0	0.0	34.7	0	0.0	60.5	0	0.0	87.5	67.0
Upper	0	0.0	5.4	0	0.0	53.6	0	0.0	2.6	0	0.0	0.3	3.5
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
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	3	2.0	1.9	256	1.5	1.2	3	2.2	2.2	141	1.0	1.7	3.1
Moderate	11	7.3	7.7	826	4.8	4.9	12	9.0	8.1	842	5.8	5.4	9.0
Middle	120	80.0	76.5	12,843	74.0	72.4	96	71.6	76.0	10,346	71.3	76.7	77.6
Upper	16	10.7	13.9	3,435	19.8	21.6	23	17.2	13.8	3,191	22.0	16.2	10.2
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	150	100.0	100.0	17,360	100.0	100.0	134	100.0	100.0	14,520	100.0	100.0	100.0

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 11020 (Altoona, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	25	16.6	6.1	2,976	17.8	8.2	9.1
Moderate	16	10.6	7.4	998	6.0	5.3	8.4
Middle	98	64.9	75.7	11,492	68.6	73.7	76.6
Upper	12	7.9	9.7	1,275	7.6	12.5	6.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.2	0	0.0	0.2	
<b>Total</b>	<b>151</b>	<b>100.0</b>	<b>100.0</b>	<b>16,741</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 11020 (Altoona, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	33	10.8	6.0	3,731	9.8	6.3	16	8.7	4.6	2,664	13.3	6.9	8.0
Moderate	20	6.5	7.2	2,319	6.1	7.6	21	11.5	7.8	2,563	12.8	7.7	8.8
Middle	224	73.2	76.9	29,653	77.5	77.3	121	66.1	77.4	11,054	55.4	75.9	77.0
Upper	29	9.5	9.6	2,563	6.7	8.8	25	13.7	9.5	3,689	18.5	8.7	6.2
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	0.3	0	0.0	0.0	0	0.0	0.7	0	0.0	0.7	
<b>Total</b>	<b>306</b>	<b>100.0</b>	<b>100.0</b>	<b>38,266</b>	<b>100.0</b>	<b>100.0</b>	<b>183</b>	<b>100.0</b>	<b>100.0</b>	<b>19,970</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 11020 (Altoona, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	3	13.0	9.1	181	4.9	5.0	19.9
<b>Moderate</b>	7	30.4	24.8	1,000	27.1	18.5	18.7
<b>Middle</b>	4	17.4	22.7	456	12.3	22.2	21.9
<b>Upper</b>	7	30.4	31.1	1,890	51.2	44.7	39.5
<b>Unknown</b>	2	8.7	12.4	166	4.5	9.6	0.0
<b>Total</b>	23	100.0	100.0	3,693	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	3	7.5	9.2	151	4.5	4.7	19.9
<b>Moderate</b>	14	35.0	18.9	998	29.6	12.9	18.7
<b>Middle</b>	8	20.0	20.7	765	22.7	18.3	21.9
<b>Upper</b>	13	32.5	36.5	1,334	39.5	44.6	39.5
<b>Unknown</b>	2	5.0	14.7	127	3.8	19.5	0.0
<b>Total</b>	40	100.0	100.0	3,375	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	3	10.7	7.8	90	7.0	6.8	19.9
<b>Moderate</b>	10	35.7	21.5	345	27.0	17.7	18.7
<b>Middle</b>	7	25.0	23.8	382	29.8	23.1	21.9
<b>Upper</b>	7	25.0	42.7	363	28.4	48.3	39.5
<b>Unknown</b>	1	3.6	4.1	100	7.8	4.1	0.0
<b>Total</b>	28	100.0	100.0	1,280	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	9	9.6	9.0	422	4.9	5.0	19.9
<b>Moderate</b>	31	33.0	21.6	2,343	27.1	16.1	18.7
<b>Middle</b>	19	20.2	21.7	1,603	18.6	20.5	21.9
<b>Upper</b>	27	28.7	34.8	3,587	41.5	44.5	39.5
<b>Unknown</b>	8	8.5	12.9	685	7.9	14.0	0.0
<b>Total</b>	94	100.0	100.0	8,640	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 11020 (Altoona, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	5	9.1	7.0	367	4.9	3.7	12	28.6	13.1	1,141	20.4	8.0	19.9
Moderate	18	32.7	21.3	1,892	25.2	15.6	16	38.1	24.0	1,887	33.8	19.1	18.7
Middle	12	21.8	24.5	1,369	18.3	22.6	7	16.7	20.8	1,111	19.9	21.6	21.9
Upper	14	25.5	36.3	2,829	37.7	49.3	7	16.7	25.8	1,441	25.8	38.1	39.5
Unknown	6	10.9	11.0	1,038	13.8	8.7	0	0.0	16.1	0	0.0	13.3	0.0
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>7,495</b>	<b>100.0</b>	<b>100.0</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>5,580</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	5	10.2	3.6	269	3.6	1.6	12	19.0	7.4	636	8.4	3.9	19.9
Moderate	11	22.4	11.3	810	10.9	6.6	11	17.5	17.8	804	10.6	11.9	18.7
Middle	11	22.4	19.2	1,579	21.3	15.0	15	23.8	22.7	1,658	21.9	19.8	21.9
Upper	19	38.8	50.1	4,110	55.5	59.7	23	36.5	37.6	4,231	55.8	47.7	39.5
Unknown	3	6.1	15.8	641	8.7	17.2	2	3.2	14.4	251	3.3	16.7	0.0
<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>7,409</b>	<b>100.0</b>	<b>100.0</b>	<b>63</b>	<b>100.0</b>	<b>100.0</b>	<b>7,580</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	5	12.2	9.3	116	5.6	5.1	3	10.7	9.3	77	6.0	6.0	19.9
Moderate	11	26.8	14.9	438	21.1	12.0	6	21.4	22.1	257	19.9	18.1	18.7
Middle	9	22.0	23.1	440	21.2	18.6	9	32.1	23.2	326	25.2	19.5	21.9
Upper	13	31.7	49.5	857	41.4	59.3	9	32.1	40.5	555	42.9	52.6	39.5
Unknown	3	7.3	3.2	220	10.6	5.0	1	3.6	4.8	79	6.1	3.8	0.0
<b>Total</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>2,071</b>	<b>100.0</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>1,294</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	15	10.0	5.4	752	4.3	2.5	27	20.1	9.9	1,854	12.8	5.7	19.9
Moderate	40	26.7	15.4	3,140	18.1	10.3	33	24.6	20.3	2,948	20.3	15.1	18.7
Middle	32	21.3	21.1	3,388	19.5	17.9	31	23.1	21.5	3,095	21.3	20.3	21.9
Upper	46	30.7	43.3	7,796	44.9	54.5	39	29.1	32.9	6,227	42.9	43.3	39.5
Unknown	17	11.3	14.8	2,284	13.2	14.8	4	3.0	15.4	396	2.7	15.6	0.0
<b>Total</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>17,360</b>	<b>100.0</b>	<b>100.0</b>	<b>134</b>	<b>100.0</b>	<b>100.0</b>	<b>14,520</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 11020 (Altoona, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	91	60.3	45.6	8,397	50.2	42.5	88.8
Over \$1 Million	56	37.1		8,091	48.3		9.9
Revenue Unknown	4	2.6		253	1.5		1.3
<b>Total</b>	<b>151</b>	<b>100.0</b>		<b>16,741</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	116	76.8	92.9	3,815	22.8	38.0	
\$100,001 - \$250,000	19	12.6	4.0	3,406	20.3	18.2	
\$250,001 - \$1 Million	16	10.6	3.2	9,520	56.9	43.8	
<b>Total</b>	<b>151</b>	<b>100.0</b>	<b>100.0</b>	<b>16,741</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	74	81.3		2,126	25.3		
\$100,001 - \$250,000	9	9.9		1,401	16.7		
\$250,001 - \$1 Million	8	8.8		4,870	58.0		
<b>Total</b>	<b>91</b>	<b>100.0</b>		<b>8,397</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 11020 (Altoona, PA)													
	Bank And Aggregate Loans By Year												
	2020						2021						Total Businesses %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	121	39.5	42.7	12,444	32.5	26.7	70	38.3	53.2	6,016	30.1	35.3	88.9
Over \$1 Million	90	29.4		19,861	51.9		53	29.0		11,077	55.5		9.5
Revenue Unknown	95	31.0		5,961	15.6		60	32.8		2,877	14.4		1.6
<b>Total</b>	<b>306</b>	<b>100.0</b>		<b>38,266</b>	<b>100.0</b>		<b>183</b>	<b>100.0</b>		<b>19,970</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	205	67.0	83.8	7,329	19.2	26.8	124	67.8	88.4	3,947	19.8	29.8	
\$100,001 - \$250,000	52	17.0	8.5	8,500	22.2	19.6	35	19.1	6.1	5,530	27.7	18.6	
\$250,001 - \$1 Million	49	16.0	7.8	22,437	58.6	53.6	24	13.1	5.5	10,493	52.5	51.5	
<b>Total</b>	<b>306</b>	<b>100.0</b>	<b>100.0</b>	<b>38,266</b>	<b>100.0</b>	<b>100.0</b>	<b>183</b>	<b>100.0</b>	<b>100.0</b>	<b>19,970</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	94	77.7		2,823	22.7		55	78.6		1,562	26.0		
\$100,001 - \$250,000	12	9.9		1,934	15.5		7	10.0		1,034	17.2		
\$250,001 - \$1 Million	15	12.4		7,687	61.8		8	11.4		3,420	56.8		
<b>Total</b>	<b>121</b>	<b>100.0</b>		<b>12,444</b>	<b>100.0</b>		<b>70</b>	<b>100.0</b>		<b>6,016</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 14100 (Bloomsburg-Berwick, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	12.5	19.6	455	15.2	15.2	11.6
Middle	11	68.8	64.1	1,675	55.9	61.4	71.2
Upper	3	18.8	16.2	867	28.9	23.4	17.2
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	
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>2,997</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	11.1	10.5	67	3.0	7.1	11.6
Middle	10	55.6	69.8	874	39.7	69.3	71.2
Upper	6	33.3	19.7	1,259	57.2	23.5	17.2
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	
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>2,200</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.3	0	0.0	7.5	11.6
Middle	6	66.7	72.0	320	36.7	65.0	71.2
Upper	3	33.3	16.7	551	63.3	27.5	17.2
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	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>871</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	46.7	0	0.0	27.4	33.5
Middle	0	0.0	46.7	0	0.0	32.9	53.2
Upper	0	0.0	6.7	0	0.0	39.7	13.3
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	9.1	15.7	522	8.5	12.8	11.6
Middle	28	63.6	66.8	2,947	47.9	63.2	71.2
Upper	12	27.3	17.5	2,677	43.6	24.0	17.2
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	
<b>Total</b>	<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>6,146</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 14100 (Bloomsburg-Berwick, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	6.7	20.0	225	8.5	15.8	5	20.8	20.2	706	16.1	15.2	11.6
Middle	10	66.7	63.6	1,723	65.2	62.0	18	75.0	62.7	3,533	80.6	58.3	71.2
Upper	4	26.7	16.4	693	26.2	22.2	1	4.2	17.1	146	3.3	26.6	17.2
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	
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>2,641</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>4,385</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	3.8	9.0	65	1.7	6.2	4	11.8	11.4	417	9.3	8.1	11.6
Middle	14	53.8	68.3	2,284	58.9	63.9	24	70.6	68.8	3,173	70.9	65.2	71.2
Upper	11	42.3	22.7	1,530	39.4	29.9	6	17.6	19.7	884	19.8	26.7	17.2
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	
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>3,879</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>4,474</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	8.3	6.9	25	3.6	6.6	1	16.7	10.6	100	24.6	11.4	11.6
Middle	7	58.3	69.3	364	52.9	60.4	5	83.3	68.2	306	75.4	64.3	71.2
Upper	4	33.3	23.8	299	43.5	33.0	0	0.0	21.2	0	0.0	24.3	17.2
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	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>688</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>406</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
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	39.1	0	0.0	57.5	0	0.0	21.2	0	0.0	9.9	33.5
Middle	0	0.0	60.9	0	0.0	42.5	1	100.0	69.7	536	100.0	76.9	53.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	9.1	0	0.0	13.2	13.3
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>536</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	5.5	13.6	315	4.2	12.0	10	15.4	15.3	1,223	12.5	11.6	11.6
Middle	33	60.0	66.9	4,600	61.9	62.4	48	73.8	66.0	7,548	77.0	62.4	71.2
Upper	19	34.5	19.5	2,522	33.9	25.6	7	10.8	18.6	1,030	10.5	26.0	17.2
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	
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>7,437</b>	<b>100.0</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>9,801</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 14100 (Bloomsburg-Berwick, PA)							
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	11	17.5	13.6	389	14.9	19.0	17.9
Middle	35	55.6	65.4	1,169	44.9	58.4	62.1
Upper	17	27.0	19.4	1,045	40.1	20.8	19.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.5	0	0.0	1.9	
<b>Total</b>	<b>63</b>	<b>100.0</b>	<b>100.0</b>	<b>2,603</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 14100 (Bloomsburg-Berwick, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	14.2	14.8	1,292	12.6	14.7	11	16.9	14.7	952	14.3	16.8	17.6
Middle	69	61.1	64.0	5,361	52.3	57.5	42	64.6	64.9	3,183	47.7	54.9	62.8
Upper	28	24.8	20.9	3,605	35.1	27.5	12	18.5	19.9	2,541	38.1	28.2	19.7
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	0.3	0	0.0	0.2	0	0.0	0.5	0	0.0	0.1	
<b>Total</b>	<b>113</b>	<b>100.0</b>	<b>100.0</b>	<b>10,258</b>	<b>100.0</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>6,676</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 14100 (Bloomsburg-Berwick, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	6.3	6.6	30	1.0	3.7	19.0
<b>Moderate</b>	1	6.3	19.2	154	5.1	13.6	19.2
<b>Middle</b>	3	18.8	21.8	551	18.4	20.7	21.0
<b>Upper</b>	10	62.5	38.3	2,206	73.6	50.6	40.8
<b>Unknown</b>	1	6.3	14.1	56	1.9	11.5	0.0
<b>Total</b>	16	100.0	100.0	2,997	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	2	11.1	8.7	82	3.7	4.6	19.0
<b>Moderate</b>	2	11.1	19.7	225	10.2	13.9	19.2
<b>Middle</b>	3	16.7	20.7	380	17.3	18.3	21.0
<b>Upper</b>	9	50.0	36.7	1,428	64.9	45.6	40.8
<b>Unknown</b>	2	11.1	14.1	85	3.9	17.7	0.0
<b>Total</b>	18	100.0	100.0	2,200	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	2	22.2	11.3	65	7.5	7.6	19.0
<b>Moderate</b>	1	11.1	17.3	100	11.5	14.1	19.2
<b>Middle</b>	2	22.2	17.9	105	12.1	12.1	21.0
<b>Upper</b>	4	44.4	50.0	601	69.0	63.3	40.8
<b>Unknown</b>	0	0.0	3.6	0	0.0	2.8	0.0
<b>Total</b>	9	100.0	100.0	871	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	5	11.4	7.6	177	2.9	4.1	19.0
<b>Moderate</b>	4	9.1	18.8	479	7.8	13.6	19.2
<b>Middle</b>	8	18.2	21.1	1,036	16.9	19.5	21.0
<b>Upper</b>	23	52.3	38.9	4,235	68.9	49.0	40.8
<b>Unknown</b>	4	9.1	13.6	219	3.6	13.8	0.0
<b>Total</b>	44	100.0	100.0	6,146	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 14100 (Bloomsburg-Berwick, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	20.0	7.0	333	12.6	4.2	4	16.7	12.0	435	9.9	6.9	19.0
Moderate	1	6.7	22.1	171	6.5	16.8	5	20.8	21.1	558	12.7	16.7	19.2
Middle	5	33.3	25.5	719	27.2	24.6	8	33.3	21.6	1,728	39.4	21.2	21.0
Upper	5	33.3	33.3	1,268	48.0	44.6	6	25.0	29.6	1,469	33.5	41.4	40.8
Unknown	1	6.7	12.0	150	5.7	9.8	1	4.2	15.8	195	4.4	13.7	0.0
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>2,641</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>4,385</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	11.5	5.5	180	4.6	2.5	9	26.5	8.1	605	13.5	4.6	19.0
Moderate	2	7.7	13.0	133	3.4	8.1	5	14.7	17.1	419	9.4	12.2	19.2
Middle	8	30.8	19.3	1,021	26.3	15.2	6	17.6	22.1	834	18.6	19.7	21.0
Upper	13	50.0	43.5	2,545	65.6	54.0	12	35.3	35.7	2,189	48.9	45.3	40.8
Unknown	0	0.0	18.7	0	0.0	20.4	2	5.9	17.0	427	9.5	18.1	0.0
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>3,879</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>4,474</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	16.7	9.9	130	18.9	8.8	2	33.3	14.4	106	26.1	13.1	19.0
Moderate	0	0.0	12.9	0	0.0	11.2	0	0.0	16.7	0	0.0	14.7	19.2
Middle	5	41.7	21.8	298	43.3	20.9	2	33.3	25.8	200	49.3	24.7	21.0
Upper	5	41.7	49.5	260	37.8	49.9	1	16.7	37.9	50	12.3	39.2	40.8
Unknown	0	0.0	5.9	0	0.0	9.2	1	16.7	5.3	50	12.3	8.3	0.0
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>688</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>406</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	8	14.5	6.4	643	8.6	3.3	15	23.4	10.1	1,146	12.4	5.9	19.0
Moderate	3	5.5	16.4	304	4.1	11.8	10	15.6	18.8	977	10.5	14.4	19.2
Middle	18	32.7	22.5	2,038	27.4	19.4	16	25.0	22.0	2,762	29.8	20.5	21.0
Upper	23	41.8	38.7	4,073	54.8	49.3	19	29.7	33.2	3,708	40.0	43.2	40.8
Unknown	3	5.5	16.0	379	5.1	16.2	4	6.3	16.0	672	7.3	16.0	0.0
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>7,437</b>	<b>100.0</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>	<b>100.0</b>	<b>9,265</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 14100 (Bloomsburg-Berwick, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	48	76.2	44.6	1,520	58.4	35.7	90.9
Over \$1 Million	14	22.2		961	36.9		6.6
Revenue Unknown	1	1.6		122	4.7		2.5
<b>Total</b>	<b>63</b>	<b>100.0</b>		<b>2,603</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	57	90.5	95.3	1,396	53.6	48.0	
\$100,001 - \$250,000	5	7.9	3.0	707	27.2	19.2	
\$250,001 - \$1 Million	1	1.6	1.7	500	19.2	32.7	
<b>Total</b>	<b>63</b>	<b>100.0</b>	<b>100.0</b>	<b>2,603</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	45	93.8		1,066	70.1		
\$100,001 - \$250,000	3	6.3		454	29.9		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>48</b>	<b>100.0</b>		<b>1,520</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 14100 (Bloomsburg-Berwick, PA)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	61	54.0	38.4	3,928	38.3	33.8	20	30.8	49.2	1,217	18.2	32.2	90.4
Over \$1 Million	28	24.8		4,657	45.4		22	33.8		3,752	56.2		6.9
Revenue Unknown	24	21.2		1,673	16.3		23	35.4		1,707	25.6		2.8
<b>Total</b>	<b>113</b>	<b>100.0</b>		<b>10,258</b>	<b>100.0</b>		<b>65</b>	<b>100.0</b>		<b>6,676</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	85	75.2	89.8	2,588	25.2	31.1	47	72.3	92.8	1,326	19.9	37.9	
\$100,001 - \$250,000	15	13.3	5.1	2,352	22.9	17.2	8	12.3	3.5	1,188	17.8	15.9	
\$250,001 - \$1 Million	13	11.5	5.2	5,318	51.8	51.8	10	15.4	3.7	4,162	62.3	46.2	
<b>Total</b>	<b>113</b>	<b>100.0</b>	<b>100.0</b>	<b>10,258</b>	<b>100.0</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>6,676</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	54	88.5		1,479	37.7		17	85.0		397	32.6		
\$100,001 - \$250,000	3	4.9		384	9.8		1	5.0		131	10.8		
\$250,001 - \$1 Million	4	6.6		2,065	52.6		2	10.0		689	56.6		
<b>Total</b>	<b>61</b>	<b>100.0</b>		<b>3,928</b>	<b>100.0</b>		<b>20</b>	<b>100.0</b>		<b>1,217</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 16540 (Chambersburg-Waynesboro, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.9	0	0.0	2.4	1.4
Moderate	1	3.6	9.6	38	0.7	7.6	6.5
Middle	27	96.4	77.8	5,209	99.3	78.7	82.7
Upper	0	0.0	9.7	0	0.0	11.4	9.4
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	
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>5,247</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	1.7	1.9	268	2.2	1.6	1.4
Moderate	7	6.0	6.3	815	6.7	5.0	6.5
Middle	101	87.1	82.1	10,338	85.5	82.3	82.7
Upper	6	5.2	9.7	675	5.6	11.1	9.4
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	
<b>Total</b>	<b>116</b>	<b>100.0</b>	<b>100.0</b>	<b>12,096</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.6	0	0.0	1.4	1.4
Moderate	3	7.5	4.6	150	5.6	5.2	6.5
Middle	35	87.5	83.9	2,361	88.7	81.9	82.7
Upper	2	5.0	9.8	150	5.6	11.5	9.4
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	
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>2,661</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	5.7	0	0.0	11.6	11.2
Moderate	0	0.0	34.3	0	0.0	36.1	21.2
Middle	2	100.0	60.0	5,328	100.0	52.3	66.8
Upper	0	0.0	0.0	0	0.0	0.0	0.7
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	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>5,328</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	3	1.6	2.5	358	1.4	2.5	1.4
Moderate	15	7.8	8.2	1,492	5.7	7.8	6.5
Middle	167	86.5	79.5	23,544	89.8	78.8	82.7
Upper	8	4.1	9.8	825	3.1	11.0	9.4
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	
<b>Total</b>	<b>193</b>	<b>100.0</b>	<b>100.0</b>	<b>26,219</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 16540 (Chambersburg-Waynesboro, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	3.9	2.4	397	5.0	1.9	1	2.6	3.6	187	2.4	3.0	1.4
Moderate	11	21.6	9.6	1,465	18.4	7.7	4	10.5	10.4	462	5.9	8.4	6.5
Middle	34	66.7	75.9	5,542	69.6	76.7	28	73.7	74.6	5,647	71.5	75.5	82.7
Upper	4	7.8	12.1	561	7.0	13.6	5	13.2	11.4	1,598	20.2	13.1	9.4
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	
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>7,965</b>	<b>100.0</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>7,894</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	4	4.6	1.7	551	4.5	1.4	3	2.3	2.0	395	2.3	1.6	1.4
Moderate	4	4.6	5.2	348	2.8	4.1	7	5.5	6.8	591	3.5	5.3	6.5
Middle	72	82.8	79.4	10,083	81.7	79.7	110	85.9	77.9	14,773	87.7	78.7	82.7
Upper	7	8.0	13.6	1,366	11.1	14.8	8	6.3	13.3	1,091	6.5	14.4	9.4
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	
<b>Total</b>	<b>87</b>	<b>100.0</b>	<b>100.0</b>	<b>12,348</b>	<b>100.0</b>	<b>100.0</b>	<b>128</b>	<b>100.0</b>	<b>100.0</b>	<b>16,850</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.3	0	0.0	0.2	1	2.5	1.4	15	0.6	1.2	1.4
Moderate	1	3.7	4.7	100	4.0	3.5	1	2.5	3.5	75	2.8	3.2	6.5
Middle	23	85.2	83.9	2,114	84.9	82.2	35	87.5	86.7	2,413	90.9	87.0	82.7
Upper	3	11.1	11.1	277	11.1	14.1	3	7.5	8.4	151	5.7	8.5	9.4
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	
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>2,491</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>2,654</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	25.6	0	0.0	18.9	0	0.0	19.0	0	0.0	25.1	
Moderate	0	0.0	23.3	0	0.0	10.5	0	0.0	23.8	0	0.0	15.4	21.2
Middle	1	100.0	48.8	4,344	100.0	69.1	0	0.0	52.4	0	0.0	57.9	66.8
Upper	0	0.0	2.3	0	0.0	1.5	0	0.0	4.8	0	0.0	1.6	0.7
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,344</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	7	4.0	2.1	1,035	3.6	1.9	5	2.4	2.8	597	2.1	3.0	
Moderate	18	10.2	7.2	2,033	7.1	5.8	13	6.2	8.1	1,276	4.6	7.0	6.5
Middle	136	76.8	78.1	22,930	80.5	78.3	175	83.7	76.9	23,175	83.1	76.7	82.7
Upper	16	9.0	12.7	2,503	8.8	14.0	16	7.7	12.2	2,840	10.2	13.3	9.4
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	
<b>Total</b>	<b>177</b>	<b>100.0</b>	<b>100.0</b>	<b>28,501</b>	<b>100.0</b>	<b>100.0</b>	<b>209</b>	<b>100.0</b>	<b>100.0</b>	<b>27,888</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 16540 (Chambersburg-Waynesboro, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	2	1.7	3.2	134	1.2	5.2	4.5
Moderate	6	5.2	5.9	171	1.5	7.6	8.4
Middle	102	88.7	83.5	10,718	95.9	79.8	79.7
Upper	5	4.3	6.8	157	1.4	7.1	7.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.3	
<b>Total</b>	<b>115</b>	<b>100.0</b>	<b>100.0</b>	<b>11,180</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: MSA 16540 (Chambersburg-Waynesboro, PA)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Businesses %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
Low	19	6.8	3.9	3,225	11.2	6.6	6	3.2	3.3	961	5.7	5.6	4.5	
Moderate	27	9.6	6.7	3,279	11.4	6.4	24	12.9	5.4	2,333	13.9	5.8	8.2	
Middle	214	76.2	82.3	20,929	72.7	79.9	142	76.3	82.0	12,498	74.6	80.5	79.7	
Upper	21	7.5	7.0	1,365	4.7	7.0	14	7.5	8.8	963	5.7	8.1	7.6	
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	0.2	0	0.0	0.1	0	0.0	0.5	0	0.0	0.1		
<b>Total</b>	<b>281</b>	<b>100.0</b>	<b>100.0</b>	<b>28,798</b>	<b>100.0</b>	<b>100.0</b>	<b>186</b>	<b>100.0</b>	<b>100.0</b>	<b>16,755</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 16540 (Chambersburg-Waynesboro, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	2	7.1	9.6	281	5.4	6.2	18.6
<b>Moderate</b>	4	14.3	24.0	605	11.5	20.5	19.9
<b>Middle</b>	8	28.6	21.8	1,645	31.4	21.9	22.3
<b>Upper</b>	13	46.4	25.2	2,078	39.6	32.7	39.2
<b>Unknown</b>	1	3.6	19.4	638	12.2	18.7	0.0
<b>Total</b>	28	100.0	100.0	5,247	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	17	14.7	9.3	1,217	10.1	5.5	18.6
<b>Moderate</b>	34	29.3	20.3	3,078	25.4	15.2	19.9
<b>Middle</b>	29	25.0	21.8	3,255	26.9	19.7	22.3
<b>Upper</b>	34	29.3	27.8	4,236	35.0	33.8	39.2
<b>Unknown</b>	2	1.7	20.7	310	2.6	25.9	0.0
<b>Total</b>	116	100.0	100.0	12,096	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	7	17.5	10.7	469	17.6	9.1	18.6
<b>Moderate</b>	10	25.0	21.9	648	24.4	21.7	19.9
<b>Middle</b>	7	17.5	23.8	630	23.7	21.1	22.3
<b>Upper</b>	16	40.0	41.0	914	34.3	41.4	39.2
<b>Unknown</b>	0	0.0	2.7	0	0.0	6.7	0.0
<b>Total</b>	40	100.0	100.0	2,661	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	26	13.6	9.6	1,967	9.4	6.0	18.6
<b>Moderate</b>	48	25.1	22.1	4,331	20.7	18.5	19.9
<b>Middle</b>	44	23.0	21.9	5,530	26.5	21.0	22.3
<b>Upper</b>	63	33.0	27.4	7,228	34.6	33.0	39.2
<b>Unknown</b>	10	5.2	18.9	1,835	8.8	21.6	0.0
<b>Total</b>	191	100.0	100.0	20,891	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 16540 (Chambersburg-Waynesboro, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	11	21.6	9.5	1,329	16.7	6.4	3	7.9	6.5	355	4.5	3.9	18.6
Moderate	9	17.6	23.9	1,453	18.2	20.6	6	15.8	22.1	955	12.1	17.9	19.9
Middle	13	25.5	20.0	2,272	28.5	20.5	8	21.1	21.2	2,071	26.2	21.3	22.3
Upper	11	21.6	23.3	1,882	23.6	30.3	13	34.2	24.6	3,335	42.2	31.7	39.2
Unknown	7	13.7	23.3	1,029	12.9	22.2	8	21.1	25.5	1,178	14.9	25.2	0.0
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>7,965</b>	<b>100.0</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>7,894</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	13	14.9	5.3	1,252	10.1	3.0	20	15.6	5.9	1,743	10.3	3.5	18.6
Moderate	24	27.6	15.7	3,180	25.8	11.7	27	21.1	16.0	2,730	16.2	12.1	19.9
Middle	22	25.3	19.3	3,165	25.6	17.1	34	26.6	20.1	4,438	26.3	18.2	22.3
Upper	25	28.7	30.9	4,218	34.2	36.0	44	34.4	32.1	7,426	44.1	38.0	39.2
Unknown	3	3.4	28.7	533	4.3	32.1	3	2.3	25.9	513	3.0	28.2	0.0
<b>Total</b>	<b>87</b>	<b>100.0</b>	<b>100.0</b>	<b>12,348</b>	<b>100.0</b>	<b>100.0</b>	<b>128</b>	<b>100.0</b>	<b>100.0</b>	<b>16,850</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	3	11.1	9.9	403	16.2	8.2	7	17.5	9.4	316	11.9	6.6	18.6
Moderate	8	29.6	19.3	555	22.3	15.2	2	5.0	16.9	61	2.3	11.8	19.9
Middle	4	14.8	23.1	260	10.4	19.1	10	25.0	21.3	586	22.1	19.1	22.3
Upper	12	44.4	45.0	1,273	51.1	51.8	19	47.5	50.1	1,575	59.3	57.6	39.2
Unknown	0	0.0	2.6	0	0.0	5.7	2	5.0	2.3	116	4.4	4.9	0.0
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>2,491</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>2,654</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	27	15.3	7.2	2,984	12.4	4.6	30	14.4	6.4	2,414	8.7	3.8	18.6
Moderate	41	23.3	18.9	5,188	21.5	15.5	35	16.7	18.5	3,746	13.4	14.8	19.9
Middle	39	22.2	19.6	5,697	23.6	18.3	52	24.9	20.7	7,095	25.4	19.7	22.3
Upper	48	27.3	28.5	7,373	30.5	33.4	76	36.4	30.2	12,336	44.2	35.4	39.2
Unknown	21	11.9	25.8	2,915	12.1	28.2	16	7.7	24.2	2,297	8.2	26.3	0.0
<b>Total</b>	<b>176</b>	<b>100.0</b>	<b>100.0</b>	<b>24,157</b>	<b>100.0</b>	<b>100.0</b>	<b>209</b>	<b>100.0</b>	<b>100.0</b>	<b>27,888</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 16540 (Chambersburg-Waynesboro, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	86	74.8	47.6	5,481	49.0	43.2	92.3
Over \$1 Million	29	25.2		5,699	51.0		6.7
Revenue Unknown	0	0.0		0	0.0		1.1
<b>Total</b>	<b>115</b>	<b>100.0</b>		<b>11,180</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	88	76.5	90.9	2,042	18.3	31.7	
\$100,001 - \$250,000	12	10.4	4.9	2,041	18.3	20.0	
\$250,001 - \$1 Million	15	13.0	4.2	7,097	63.5	48.3	
<b>Total</b>	<b>115</b>	<b>100.0</b>	<b>100.0</b>	<b>11,180</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	72	83.7		1,465	26.7		
\$100,001 - \$250,000	8	9.3		1,387	25.3		
\$250,001 - \$1 Million	6	7.0		2,629	48.0		
<b>Total</b>	<b>86</b>	<b>100.0</b>		<b>5,481</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 16540 (Chambersburg-Waynesboro, PA)													
	Bank And Aggregate Loans By Year												
	2020						2021						Total Businesses %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	135	48.0	36.0	5,995	20.8	27.4	80	43.0	37.0	3,987	23.8	34.1	92.4
Over \$1 Million	65	23.1		16,250	56.4		32	17.2		7,741	46.2		6.5
Revenue Unknown	81	28.8		6,553	22.8		74	39.8		5,027	30.0		1.1
<b>Total</b>	<b>281</b>	<b>100.0</b>	<b>100.0</b>	<b>28,798</b>	<b>100.0</b>	<b>100.0</b>	<b>186</b>	<b>100.0</b>	<b>100.0</b>	<b>16,755</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	221	78.6	87.9	6,892	23.9	32.2	152	81.7	92.2	4,071	24.3	37.5	
\$100,001 - \$250,000	28	10.0	6.9	4,795	16.7	19.4	13	7.0	4.7	2,221	13.3	20.5	
\$250,001 - \$1 Million	32	11.4	5.2	17,111	59.4	48.3	21	11.3	3.1	10,463	62.4	42.0	
<b>Total</b>	<b>281</b>	<b>100.0</b>	<b>100.0</b>	<b>28,798</b>	<b>100.0</b>	<b>100.0</b>	<b>186</b>	<b>100.0</b>	<b>100.0</b>	<b>16,755</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	128	94.8		3,477	58.0		74	92.5		1,999	50.1		
\$100,001 - \$250,000	3	2.2		452	7.5		2	2.5		338	8.5		
\$250,001 - \$1 Million	4	3.0		2,066	34.5		4	5.0		1,650	41.4		
<b>Total</b>	<b>135</b>	<b>100.0</b>		<b>5,995</b>	<b>100.0</b>		<b>80</b>	<b>100.0</b>		<b>3,987</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 20700 (East Stroudsburg, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	8.7	10.9	503	11.1	11.2	8.0
Middle	20	87.0	85.8	3,720	82.0	84.7	86.4
Upper	1	4.3	3.2	312	6.9	4.1	5.6
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	
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>4,535</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.5	0	0.0	10.2	8.0
Middle	4	100.0	85.0	420	100.0	83.1	86.4
Upper	0	0.0	5.4	0	0.0	6.8	5.6
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	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>420</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	8.5	0	0.0	8.1	8.0
Middle	2	100.0	87.3	113	100.0	86.8	86.4
Upper	0	0.0	4.2	0	0.0	5.1	5.6
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	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>113</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	41.7	1,700	100.0	17.2	47.2
Middle	0	0.0	54.2	0	0.0	81.0	49.9
Upper	0	0.0	4.2	0	0.0	1.8	2.9
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,700</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	10.3	10.3	2,447	30.2	10.9	8.0
Middle	33	84.6	85.7	5,136	63.4	84.4	86.4
Upper	2	5.1	4.0	521	6.4	4.7	5.6
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	
<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>8,104</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 20700 (East Stroudsburg, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	13.6	12.9	733	15.9	14.0	2	12.5	12.4	328	10.0	12.8	8.0
Middle	16	72.7	84.0	3,254	70.8	82.0	14	87.5	84.2	2,968	90.0	83.1	86.4
Upper	3	13.6	3.1	609	13.3	4.0	0	0.0	3.4	0	0.0	4.0	5.6
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	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>4,596</b>	<b>100.0</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>3,296</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	12.5	8.6	300	13.5	9.3	1	3.6	8.7	720	13.6	9.3	8.0
Middle	11	68.8	85.8	1,404	63.2	83.5	26	92.9	85.8	4,391	83.1	84.3	86.4
Upper	3	18.8	5.7	519	23.3	7.2	1	3.6	5.4	176	3.3	6.5	5.6
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	
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>2,223</b>	<b>100.0</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>5,287</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	12.3	0	0.0	14.0	2	15.4	12.5	115	7.7	17.4	8.0
Middle	1	33.3	81.1	74	38.9	78.2	10	76.9	81.9	1,175	78.9	75.5	86.4
Upper	2	66.7	6.6	116	61.1	7.9	1	7.7	5.5	200	13.4	7.1	5.6
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	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>190</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,490</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
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	22.2	0	0.0	13.6	1	100.0	50.0	375	100.0	69.1	47.2
Middle	0	0.0	72.2	0	0.0	85.7	0	0.0	50.0	0	0.0	30.9	49.9
Upper	0	0.0	5.6	0	0.0	0.8	0	0.0	0.0	0	0.0	0.0	2.9
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>375</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	9.8	10.7	1,219	11.9	11.9	6	9.7	10.7	1,538	13.9	12.5	8.0
Middle	47	77.0	85.0	7,816	76.0	83.0	54	87.1	85.0	9,178	82.7	82.5	86.4
Upper	8	13.1	4.2	1,244	12.1	5.1	2	3.2	4.3	376	3.4	5.0	5.6
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	
<b>Total</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>10,279</b>	<b>100.0</b>	<b>100.0</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>11,092</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 20700 (East Stroudsburg, PA)							
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	1	5.0	15.6	25	0.7	11.4	20.4
Middle	13	65.0	73.8	1,728	48.0	79.4	73.9
Upper	6	30.0	6.7	1,845	51.3	7.0	5.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	4.0	0	0.0	2.2	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>3,598</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 20700 (East Stroudsburg, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	18	22.5	16.4	1,778	26.7	17.7	10	19.6	14.4	1,104	18.9	18.0	19.3
Middle	52	65.0	75.2	4,156	62.3	73.6	35	68.6	78.1	3,705	63.4	74.7	74.8
Upper	10	12.5	7.4	735	11.0	7.8	6	11.8	6.1	1,034	17.7	6.3	5.9
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	1.0	0	0.0	0.9	0	0.0	1.4	0	0.0	1.1	
<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>6,669</b>	<b>100.0</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>5,843</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 20700 (East Stroudsburg, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	4.3	6.6	84	1.9	4.0	20.7
<b>Moderate</b>	3	13.0	22.8	557	12.3	19.2	18.1
<b>Middle</b>	4	17.4	25.3	818	18.0	26.1	21.3
<b>Upper</b>	12	52.2	31.3	2,459	54.2	37.0	39.9
<b>Unknown</b>	3	13.0	14.0	617	13.6	13.8	0.0
<b>Total</b>	23	100.0	100.0	4,535	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	8.4	0	0.0	5.0	20.7
<b>Moderate</b>	0	0.0	18.1	0	0.0	13.5	18.1
<b>Middle</b>	2	50.0	21.0	144	34.3	19.3	21.3
<b>Upper</b>	2	50.0	30.4	276	65.7	35.4	39.9
<b>Unknown</b>	0	0.0	22.2	0	0.0	26.7	0.0
<b>Total</b>	4	100.0	100.0	420	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	13.7	0	0.0	10.8	20.7
<b>Moderate</b>	0	0.0	20.4	0	0.0	18.1	18.1
<b>Middle</b>	0	0.0	25.4	0	0.0	21.9	21.3
<b>Upper</b>	2	100.0	37.7	113	100.0	45.8	39.9
<b>Unknown</b>	0	0.0	2.8	0	0.0	3.4	0.0
<b>Total</b>	2	100.0	100.0	113	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	1	2.6	7.4	84	1.3	4.3	20.7
<b>Moderate</b>	3	7.9	20.5	557	8.7	17.0	18.1
<b>Middle</b>	6	15.8	23.2	962	15.0	23.2	21.3
<b>Upper</b>	16	42.1	30.3	2,848	44.5	35.6	39.9
<b>Unknown</b>	12	31.6	18.6	1,953	30.5	19.9	0.0
<b>Total</b>	38	100.0	100.0	6,404	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 20700 (East Stroudsburg, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	6.0	0	0.0	3.6	0	0.0	4.4	0	0.0	2.6	20.7
Moderate	5	22.7	19.4	955	20.8	16.3	6	37.5	18.7	1,194	36.2	15.4	18.1
Middle	6	27.3	23.1	1,096	23.8	22.8	6	37.5	21.1	1,176	35.7	20.4	21.3
Upper	7	31.8	40.1	1,477	32.1	45.7	4	25.0	37.3	926	28.1	42.8	39.9
Unknown	4	18.2	11.4	1,068	23.2	11.6	0	0.0	18.5	0	0.0	18.8	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>4,596</b>	<b>100.0</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>3,296</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	12.5	3.5	140	6.3	2.1	1	3.6	5.6	50	0.9	3.6	20.7
Moderate	3	18.8	13.5	367	16.5	10.4	8	28.6	17.2	1,087	20.6	13.9	18.1
Middle	2	12.5	20.1	300	13.5	17.7	4	14.3	23.7	603	11.4	22.5	21.3
Upper	7	43.8	36.9	1,133	51.0	41.3	12	42.9	33.5	2,997	56.7	38.4	39.9
Unknown	2	12.5	26.0	283	12.7	28.6	3	10.7	19.9	550	10.4	21.6	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>2,223</b>	<b>100.0</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>5,287</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	9.3	0	0.0	5.7	1	7.7	8.9	155	10.4	6.9	20.7
Moderate	0	0.0	20.7	0	0.0	18.8	4	30.8	17.7	400	26.8	15.2	18.1
Middle	0	0.0	26.4	0	0.0	21.5	3	23.1	27.7	265	17.8	25.5	21.3
Upper	3	100.0	41.0	190	100.0	49.6	4	30.8	42.1	522	35.0	46.0	39.9
Unknown	0	0.0	2.6	0	0.0	4.4	1	7.7	3.7	148	9.9	6.4	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>190</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,490</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	2	3.3	5.0	140	1.4	2.9	2	3.3	5.2	205	1.9	3.1	20.7
Moderate	8	13.1	16.2	1,322	12.9	13.5	18	29.5	17.9	2,681	25.0	14.6	18.1
Middle	8	13.1	20.8	1,396	13.6	19.9	13	21.3	22.2	2,044	19.1	21.1	21.3
Upper	17	27.9	37.2	2,800	27.2	42.5	20	32.8	35.1	4,445	41.5	40.5	39.9
Unknown	26	42.6	20.7	4,621	45.0	21.2	8	13.1	19.6	1,342	12.5	20.6	0.0
<b>Total</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>10,279</b>	<b>100.0</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>10,717</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 20700 (East Stroudsburg, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	11	55.0	46.1	978	27.2	39.5	93.1
Over \$1 Million	9	45.0		2,620	72.8		5.8
Revenue Unknown	0	0.0		0	0.0		1.1
<b>Total</b>	<b>20</b>	<b>100.0</b>		<b>3,598</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	15	75.0	95.2	328	9.1	43.6	
\$100,001 - \$250,000	1	5.0	2.8	150	4.2	16.8	
\$250,001 - \$1 Million	4	20.0	2.0	3,120	86.7	39.6	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>3,598</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	10	90.9		68	7.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	1	9.1		910	93.0		
<b>Total</b>	<b>11</b>	<b>100.0</b>		<b>978</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 20700 (East Stroudsburg, PA)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	41	51.3	37.0	2,982	44.7	28.6	14	27.5	48.1	846	14.5	32.3	93.3
Over \$1 Million	20	25.0		3,202	48.0		16	31.4		4,607	78.8		5.4
Revenue Unknown	19	23.8		485	7.3		21	41.2		390	6.7		1.3
<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>6,669</b>	<b>100.0</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>5,843</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	62	77.5	92.0	1,649	24.7	42.6	38	74.5	94.0	923	15.8	44.5	
\$100,001 - \$250,000	11	13.8	5.2	1,814	27.2	22.1	6	11.8	3.9	1,018	17.4	21.7	
\$250,001 - \$1 Million	7	8.8	2.7	3,206	48.1	35.3	7	13.7	2.1	3,902	66.8	33.8	
<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>6,669</b>	<b>100.0</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>5,843</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	36	87.8		796	26.7		12	85.7		393	46.5		
\$100,001 - \$250,000	2	4.9		425	14.3		1	7.1		150	17.7		
\$250,001 - \$1 Million	3	7.3		1,761	59.1		1	7.1		303	35.8		
<b>Total</b>	<b>41</b>	<b>100.0</b>		<b>2,982</b>	<b>100.0</b>		<b>14</b>	<b>100.0</b>		<b>846</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 23900 (Gettysburg, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	7.1	2.9	320	4.9	2.2	2.2
Middle	23	82.1	83.2	5,131	78.4	79.9	83.9
Upper	3	10.7	13.9	1,092	16.7	17.9	13.9
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	
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>6,543</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.6	0	0.0	1.3	2.2
Middle	29	87.9	79.5	8,275	93.7	78.3	83.9
Upper	4	12.1	18.9	554	6.3	20.3	13.9
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	
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>8,829</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.4	0	0.0	1.9	2.2
Middle	11	91.7	82.1	756	78.3	77.1	83.9
Upper	1	8.3	16.6	210	21.7	21.1	13.9
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	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>966</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.7	0	0.0	0.7	16.1
Middle	1	100.0	92.3	5,500	100.0	99.3	83.9
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>5,500</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	2.7	2.3	320	1.5	1.8	2.2
Middle	64	86.5	81.9	19,662	90.0	80.1	83.9
Upper	8	10.8	15.8	1,856	8.5	18.1	13.9
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	
<b>Total</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>21,838</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 23900 (Gettysburg, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	3.2	3.0	353	5.5	2.5	0	0.0	2.6	0	0.0	2.1	2.2
Middle	25	80.6	82.9	4,697	73.1	81.3	20	95.2	83.7	4,074	93.7	81.5	83.9
Upper	5	16.1	14.1	1,378	21.4	16.2	1	4.8	13.7	275	6.3	16.4	13.9
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	
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>6,428</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>4,349</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
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	1.4	1	1.8	2.0	150	1.1	1.7	2.2
Middle	39	90.7	80.7	6,606	86.4	79.4	45	78.9	79.4	10,577	79.7	77.5	83.9
Upper	4	9.3	17.6	1,044	13.6	19.2	11	19.3	18.6	2,551	19.2	20.8	13.9
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	
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>7,650</b>	<b>100.0</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>13,278</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	12.5	2.7	220	13.1	2.5	1	5.0	2.7	50	2.7	2.8	2.2
Middle	16	66.7	77.4	882	52.6	77.3	14	70.0	79.3	1,321	70.5	78.7	83.9
Upper	5	20.8	19.9	576	34.3	20.2	5	25.0	18.0	502	26.8	18.5	13.9
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	
<b>Total</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>1,678</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>1,873</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	15.8	0	0.0	3.9	16.1
Middle	0	0.0	100.0	0	0.0	100.0	1	100.0	78.9	200	100.0	87.3	83.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	5.3	0	0.0	8.8	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	5.7	2.2	793	4.8	1.8	2	1.9	2.3	200	1.0	2.1	2.2
Middle	85	81.0	81.5	12,822	77.2	80.6	84	80.8	81.0	16,670	81.7	79.6	83.9
Upper	14	13.3	16.2	2,998	18.0	17.5	18	17.3	16.7	3,528	17.3	18.4	13.9
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	
<b>Total</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>	<b>16,613</b>	<b>100.0</b>	<b>100.0</b>	<b>104</b>	<b>100.0</b>	<b>100.0</b>	<b>20,398</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 23900 (Gettysburg, PA)							
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	11	15.7	9.5	884	21.0	7.8	11.2
Middle	40	57.1	76.1	2,302	54.7	80.6	77.3
Upper	19	27.1	12.7	1,019	24.2	11.3	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.7	0	0.0	0.3	
<b>Total</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>4,205</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: MSA 23900 (Gettysburg, PA)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Businesses %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	26	17.0	13.7	2,494	17.1	14.7	13	14.0	10.0	861	13.9	13.5	11.0	
Middle	114	74.5	74.4	11,084	76.1	76.1	71	76.3	76.1	5,066	81.8	78.2	77.6	
Upper	13	8.5	11.5	990	6.8	8.7	9	9.7	13.1	268	4.3	8.2	11.4	
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	0.4	0	0.0	0.5	0	0.0	0.8	0	0.0	0.1		
<b>Total</b>	<b>153</b>	<b>100.0</b>	<b>100.0</b>	<b>14,568</b>	<b>100.0</b>	<b>100.0</b>	<b>93</b>	<b>100.0</b>	<b>100.0</b>	<b>6,195</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 23900 (Gettysburg, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	7.2	0	0.0	4.4	17.9
<b>Moderate</b>	3	10.7	23.9	345	5.3	18.7	18.6
<b>Middle</b>	9	32.1	26.0	2,066	31.6	25.7	24.3
<b>Upper</b>	12	42.9	28.0	3,721	56.9	37.5	39.3
<b>Unknown</b>	4	14.3	14.8	411	6.3	13.7	0.0
<b>Total</b>	28	100.0	100.0	6,543	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	4	12.1	8.3	336	3.8	4.3	17.9
<b>Moderate</b>	6	18.2	20.3	592	6.7	15.6	18.6
<b>Middle</b>	9	27.3	22.6	1,031	11.7	20.3	24.3
<b>Upper</b>	13	39.4	33.2	3,570	40.4	39.5	39.3
<b>Unknown</b>	1	3.0	15.6	3,300	37.4	20.3	0.0
<b>Total</b>	33	100.0	100.0	8,829	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	1	8.3	7.4	50	5.2	5.7	17.9
<b>Moderate</b>	5	41.7	23.3	466	48.2	21.8	18.6
<b>Middle</b>	4	33.3	25.3	195	20.2	22.6	24.3
<b>Upper</b>	2	16.7	41.2	255	26.4	47.3	39.3
<b>Unknown</b>	0	0.0	2.7	0	0.0	2.6	0.0
<b>Total</b>	12	100.0	100.0	966	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	5	6.8	7.7	386	2.4	4.5	17.9
<b>Moderate</b>	14	19.2	22.1	1,403	8.6	17.5	18.6
<b>Middle</b>	22	30.1	24.4	3,292	20.1	23.3	24.3
<b>Upper</b>	27	37.0	31.5	7,546	46.2	38.4	39.3
<b>Unknown</b>	5	6.8	14.4	3,711	22.7	16.3	0.0
<b>Total</b>	73	100.0	100.0	16,338	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 23900 (Gettysburg, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	4	12.9	9.7	528	8.2	6.0	1	4.8	6.3	148	3.4	3.3	17.9
Moderate	16	51.6	26.6	3,083	48.0	22.0	7	33.3	22.6	1,170	26.9	17.4	18.6
Middle	4	12.9	24.0	918	14.3	24.5	6	28.6	24.2	1,079	24.8	23.8	24.3
Upper	5	16.1	25.7	1,532	23.8	34.2	6	28.6	29.0	1,820	41.8	38.0	39.3
Unknown	2	6.5	14.1	367	5.7	13.2	1	4.8	17.9	132	3.0	17.4	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>6,428</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>4,349</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	6	14.0	6.0	516	6.7	3.2	2	3.5	5.8	247	1.9	3.4	17.9
Moderate	10	23.3	16.9	1,294	16.9	13.2	13	22.8	16.8	2,263	17.0	12.9	18.6
Middle	6	14.0	21.1	1,358	17.8	19.6	21	36.8	24.0	3,101	23.4	21.7	24.3
Upper	19	44.2	33.0	4,102	53.6	37.5	19	33.3	33.9	7,391	55.7	41.1	39.3
Unknown	2	4.7	22.9	380	5.0	26.4	2	3.5	19.5	276	2.1	20.9	0.0
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>7,650</b>	<b>100.0</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>13,278</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	3	12.5	7.2	125	7.4	5.7	1	5.0	5.4	100	5.3	3.3	17.9
Moderate	5	20.8	23.5	300	17.9	25.2	4	20.0	17.2	317	16.9	14.6	18.6
Middle	4	16.7	29.4	266	15.9	27.7	4	20.0	22.2	301	16.1	19.5	24.3
Upper	8	33.3	38.0	777	46.3	40.0	10	50.0	52.5	955	51.0	56.1	39.3
Unknown	4	16.7	1.8	210	12.5	1.5	1	5.0	2.7	200	10.7	6.4	0.0
<b>Total</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>1,678</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>1,873</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	13	12.4	7.4	1,169	7.0	4.4	4	3.9	5.9	495	2.5	3.3	17.9
Moderate	31	29.5	20.3	4,677	28.2	16.7	24	23.3	18.7	3,750	18.6	14.8	18.6
Middle	14	13.3	22.2	2,542	15.3	21.4	31	30.1	24.1	4,481	22.2	22.5	24.3
Upper	32	30.5	30.0	6,411	38.6	35.7	35	34.0	33.3	10,166	50.3	40.1	39.3
Unknown	15	14.3	20.1	1,814	10.9	21.9	9	8.7	18.0	1,306	6.5	19.3	0.0
<b>Total</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>	<b>16,613</b>	<b>100.0</b>	<b>100.0</b>	<b>103</b>	<b>100.0</b>	<b>100.0</b>	<b>20,198</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 23900 (Gettysburg, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	50	71.4	50.3	2,516	59.8	44.8	92.6
<b>Over \$1 Million</b>	17	24.3		1,621	38.5		5.9
<b>Revenue Unknown</b>	3	4.3		68	1.6		1.5
<b>Total</b>	70	100.0		4,205	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	62	88.6	92.6	1,601	38.1	36.0	
<b>\$100,001 - \$250,000</b>	4	5.7	3.7	743	17.7	17.2	
<b>\$250,001 - \$1 Million</b>	4	5.7	3.7	1,861	44.3	46.8	
<b>Total</b>	70	100.0	100.0	4,205	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	45	90.0		1,102	43.8		
<b>\$100,001 - \$250,000</b>	3	6.0		603	24.0		
<b>\$250,001 - \$1 Million</b>	2	4.0		811	32.2		
<b>Total</b>	50	100.0		2,516	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 23900 (Gettysburg, PA)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	75	49.0	35.3	2,953	20.3	26.6	40	43.0	44.3	1,909	30.8	29.0	92.3
<b>Over \$1 Million</b>	36	23.5		9,308	63.9		15	16.1		3,143	50.7		6.0
<b>Revenue Unknown</b>	42	27.5		2,307	15.8		38	40.9		1,143	18.5		1.6
<b>Total</b>	153	100.0		14,568	100.0		93	100.0		6,195	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	118	77.1	85.9	3,248	22.3	31.6	80	86.0	91.1	2,307	37.2	36.2	
<b>\$100,001 - \$250,000</b>	16	10.5	9.1	2,503	17.2	25.1	7	7.5	5.1	1,168	18.9	20.0	
<b>\$250,001 - \$1 Million</b>	19	12.4	5.0	8,817	60.5	43.4	6	6.5	3.8	2,720	43.9	43.8	
<b>Total</b>	153	100.0	100.0	14,568	100.0	100.0	93	100.0	100.0	6,195	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	70	93.3		1,589	53.8		36	90.0		1,210	63.4		
<b>\$100,001 - \$250,000</b>	2	2.7		276	9.3		4	10.0		699	36.6		
<b>\$250,001 - \$1 Million</b>	3	4.0		1,088	36.8		0	0.0		0	0.0		
<b>Total</b>	75	100.0		2,953	100.0		40	100.0		1,909	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 29540 (Lancaster, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	5	10.6	2.6	463	5.4	1.7	1.6
Moderate	8	17.0	12.7	981	11.4	9.2	8.8
Middle	29	61.7	71.2	5,785	67.4	72.1	76.1
Upper	5	10.6	13.4	1,357	15.8	17.0	13.5
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	
<b>Total</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>8,586</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	1	1.6	1.8	80	1.0	1.1	1.6
Moderate	2	3.2	7.9	96	1.2	5.7	8.8
Middle	54	87.1	74.8	7,034	91.1	74.6	76.1
Upper	5	8.1	15.4	510	6.6	18.6	13.5
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	
<b>Total</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>7,720</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.5	0	0.0	1.7	1.6
Moderate	3	12.5	8.2	92	5.5	5.9	8.8
Middle	17	70.8	74.4	1,292	76.9	73.7	76.1
Upper	4	16.7	15.9	297	17.7	18.7	13.5
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	
<b>Total</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>1,681</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	7.5	0	0.0	2.1	8.0
Moderate	0	0.0	27.4	0	0.0	16.3	12.0
Middle	4	100.0	56.6	113,700	100.0	71.2	65.6
Upper	0	0.0	8.5	0	0.0	10.4	14.4
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	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>113,700</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	6	4.2	2.2	543	0.4	1.6	1.6
Moderate	14	9.7	10.5	1,263	1.0	8.9	8.8
Middle	109	75.7	73.1	128,586	96.9	72.9	76.1
Upper	15	10.4	14.2	2,333	1.8	16.7	13.5
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	
<b>Total</b>	<b>144</b>	<b>100.0</b>	<b>100.0</b>	<b>132,725</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 29540 (Lancaster, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	4	9.3	2.9	608	6.8	2.0	1	2.0	3.5	186	1.6	2.4	1.6
Moderate	14	32.6	13.2	2,214	24.9	9.4	9	18.4	14.5	1,718	15.1	10.8	8.8
Middle	24	55.8	71.1	5,787	65.1	72.0	32	65.3	69.1	7,503	66.0	70.2	76.1
Upper	1	2.3	12.8	275	3.1	16.6	7	14.3	12.8	1,969	17.3	16.5	13.5
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	
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>8,884</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>11,376</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	1.1	0	0.0	0.7	1	0.7	1.4	72	0.3	1.1	1.6
Moderate	4	5.0	6.7	273	1.9	4.9	7	5.1	8.1	651	2.7	5.8	8.8
Middle	62	77.5	75.3	11,647	79.0	74.9	111	81.0	74.3	19,234	81.0	73.8	76.1
Upper	14	17.5	16.9	2,827	19.2	19.5	18	13.1	16.3	3,780	15.9	19.4	13.5
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	
<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>14,747</b>	<b>100.0</b>	<b>100.0</b>	<b>137</b>	<b>100.0</b>	<b>100.0</b>	<b>23,737</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	1	5.6	2.1	25	2.2	2.1	0	0.0	1.2	0	0.0	1.8	1.6
Moderate	2	11.1	8.2	75	6.5	6.4	7	18.9	8.2	341	9.2	5.1	8.8
Middle	12	66.7	74.9	911	78.5	75.7	29	78.4	75.7	3,264	88.1	77.4	76.1
Upper	3	16.7	14.8	150	12.9	15.8	1	2.7	14.8	100	2.7	15.8	13.5
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	
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>1,161</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>3,705</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	11.5	0	0.0	1.5	1	33.3	16.0	1,975	27.6	5.3	
Moderate	0	0.0	25.7	0	0.0	16.0	0	0.0	24.0	0	0.0	8.2	12.0
Middle	1	100.0	59.3	14,200	100.0	81.3	2	66.7	54.4	5,173	72.4	73.9	65.6
Upper	0	0.0	3.5	0	0.0	1.2	0	0.0	5.6	0	0.0	12.6	14.4
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>14,200</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>7,148</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	6	3.7	1.9	697	1.7	1.3	3	1.3	2.2	2,233	4.8	1.8	
Moderate	26	16.0	9.3	2,988	7.2	7.5	26	11.1	10.3	2,990	6.4	7.9	8.8
Middle	112	68.7	73.7	34,405	82.9	74.3	179	76.5	72.6	35,902	76.4	72.6	76.1
Upper	19	11.7	15.1	3,403	8.2	16.9	26	11.1	14.9	5,849	12.5	17.8	13.5
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	
<b>Total</b>	<b>163</b>	<b>100.0</b>	<b>100.0</b>	<b>41,493</b>	<b>100.0</b>	<b>100.0</b>	<b>234</b>	<b>100.0</b>	<b>100.0</b>	<b>46,974</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 29540 (Lancaster, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	2	1.2	3.2	408	1.9	3.7	4.0
Moderate	12	7.4	9.8	1,422	6.7	9.6	11.0
Middle	130	80.2	72.3	15,899	75.3	75.6	73.5
Upper	18	11.1	13.8	3,388	16.0	11.0	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.9	0	0.0	0.2	
<b>Total</b>	<b>162</b>	<b>100.0</b>	<b>100.0</b>	<b>21,117</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 29540 (Lancaster, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	14	4.3	3.6	792	2.3	3.1	10	4.1	3.6	856	3.8	3.4	3.9
Moderate	41	12.7	10.6	3,002	8.7	11.4	24	9.8	9.9	2,007	9.0	10.7	10.8
Middle	245	75.6	73.4	27,831	81.0	74.1	188	77.0	73.5	16,999	76.3	72.9	73.6
Upper	24	7.4	12.2	2,722	7.9	11.4	22	9.0	12.7	2,416	10.8	13.0	11.6
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	0.2	0	0.0	0.0	0	0.0	0.4	0	0.0	0.1	
<b>Total</b>	<b>324</b>	<b>100.0</b>	<b>100.0</b>	<b>34,347</b>	<b>100.0</b>	<b>100.0</b>	<b>244</b>	<b>100.0</b>	<b>100.0</b>	<b>22,278</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 29540 (Lancaster, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	5	10.6	7.3	545	6.3	4.4	18.3
<b>Moderate</b>	12	25.5	24.3	1,932	22.5	19.4	19.2
<b>Middle</b>	10	21.3	26.2	1,788	20.8	25.4	23.1
<b>Upper</b>	10	21.3	31.5	1,870	21.8	40.6	39.4
<b>Unknown</b>	10	21.3	10.7	2,451	28.5	10.2	0.0
<b>Total</b>	47	100.0	100.0	8,586	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	6	9.7	6.6	471	6.1	3.7	18.3
<b>Moderate</b>	15	24.2	18.6	1,261	16.3	14.1	19.2
<b>Middle</b>	19	30.6	24.5	2,503	32.4	22.0	23.1
<b>Upper</b>	20	32.3	38.6	3,257	42.2	45.9	39.4
<b>Unknown</b>	2	3.2	11.7	228	3.0	14.4	0.0
<b>Total</b>	62	100.0	100.0	7,720	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	4	16.7	5.8	295	17.5	4.5	18.3
<b>Moderate</b>	5	20.8	17.9	225	13.4	14.4	19.2
<b>Middle</b>	9	37.5	27.1	511	30.4	24.1	23.1
<b>Upper</b>	5	20.8	47.4	500	29.7	54.4	39.4
<b>Unknown</b>	1	4.2	1.8	150	8.9	2.6	0.0
<b>Total</b>	24	100.0	100.0	1,681	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	15	10.7	6.8	1,311	6.9	4.1	18.3
<b>Moderate</b>	32	22.9	21.0	3,418	18.0	17.0	19.2
<b>Middle</b>	38	27.1	25.4	4,802	25.2	23.9	23.1
<b>Upper</b>	35	25.0	35.6	5,627	29.6	42.8	39.4
<b>Unknown</b>	20	14.3	11.1	3,867	20.3	12.2	0.0
<b>Total</b>	140	100.0	100.0	19,025	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 29540 (Lancaster, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	5	11.6	7.2	625	7.0	4.4	4	8.2	9.1	692	6.1	5.5	18.3
Moderate	13	30.2	26.8	2,427	27.3	21.9	13	26.5	25.8	2,633	23.1	20.4	19.2
Middle	8	18.6	24.1	1,817	20.5	23.4	13	26.5	22.4	3,198	28.1	21.8	23.1
Upper	8	18.6	30.2	2,300	25.9	38.8	13	26.5	28.9	3,541	31.1	38.3	39.4
Unknown	9	20.9	11.7	1,715	19.3	11.4	6	12.2	13.8	1,312	11.5	14.0	0.0
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>8,884</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>11,376</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	3.8	4.1	313	2.1	2.3	22	16.1	6.2	2,331	9.8	3.8	18.3
Moderate	14	17.5	17.1	1,863	12.6	12.9	40	29.2	19.6	6,192	26.1	15.3	19.2
Middle	23	28.8	23.8	3,532	24.0	21.4	27	19.7	24.9	4,743	20.0	22.8	23.1
Upper	33	41.3	39.3	7,770	52.7	46.4	46	33.6	34.2	10,106	42.6	42.0	39.4
Unknown	7	8.8	15.8	1,269	8.6	17.0	2	1.5	15.1	365	1.5	16.1	0.0
<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>14,747</b>	<b>100.0</b>	<b>100.0</b>	<b>137</b>	<b>100.0</b>	<b>100.0</b>	<b>23,737</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	1	5.6	4.1	50	4.3	2.5	3	8.1	5.2	170	4.6	3.6	18.3
Moderate	5	27.8	17.4	350	30.1	14.8	10	27.0	16.7	659	17.8	13.2	19.2
Middle	4	22.2	24.6	225	19.4	21.6	9	24.3	25.8	645	17.4	22.4	23.1
Upper	8	44.4	51.9	536	46.2	59.2	15	40.5	50.6	2,231	60.2	59.2	39.4
Unknown	0	0.0	2.0	0	0.0	2.0	0	0.0	1.7	0	0.0	1.6	0.0
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>1,161</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>3,705</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	9	5.6	5.1	988	3.6	3.1	29	12.6	7.1	3,193	8.0	4.5	18.3
Moderate	32	19.8	19.9	4,640	17.0	16.3	63	27.3	21.3	9,484	23.8	17.2	19.2
Middle	35	21.6	23.4	5,574	20.4	21.8	49	21.2	24.2	8,586	21.6	22.3	23.1
Upper	49	30.2	36.3	10,606	38.9	43.1	74	32.0	33.9	15,878	39.9	41.1	39.4
Unknown	37	22.8	15.2	5,485	20.1	15.6	16	6.9	13.6	2,685	6.7	14.8	0.0
<b>Total</b>	<b>162</b>	<b>100.0</b>	<b>100.0</b>	<b>27,293</b>	<b>100.0</b>	<b>100.0</b>	<b>231</b>	<b>100.0</b>	<b>100.0</b>	<b>39,826</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 29540 (Lancaster, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	105	64.8	48.0	7,090	33.6	35.9	90.0
<b>Over \$1 Million</b>	49	30.2		13,014	61.6		9.0
<b>Revenue Unknown</b>	8	4.9		1,013	4.8		1.0
<b>Total</b>	162	100.0		21,117	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	121	74.7	90.5	3,397	16.1	30.7	
<b>\$100,001 - \$250,000</b>	17	10.5	4.6	3,200	15.2	17.2	
<b>\$250,001 - \$1 Million</b>	24	14.8	4.9	14,520	68.8	52.0	
<b>Total</b>	162	100.0	100.0	21,117	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	90	85.7		2,055	29.0		
<b>\$100,001 - \$250,000</b>	9	8.6		1,590	22.4		
<b>\$250,001 - \$1 Million</b>	6	5.7		3,445	48.6		
<b>Total</b>	105	100.0		7,090	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 29540 (Lancaster, PA)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		\$%
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	136	42.0	46.9	7,991	23.3	33.2	110	45.1	50.7	6,569	29.5	34.9	90.4
<b>Over \$1 Million</b>	98	30.2		21,546	62.7		46	18.9		12,266	55.1		8.5
<b>Revenue Unknown</b>	90	27.8		4,810	14.0		88	36.1		3,443	15.5		1.1
<b>Total</b>	324	100.0		34,347	100.0		244	100.0		22,278	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	236	72.8	82.1	6,924	20.2	24.7	190	77.9	88.0	4,997	22.4	28.0	
<b>\$100,001 - \$250,000</b>	46	14.2	9.6	7,463	21.7	21.0	28	11.5	6.5	4,454	20.0	20.2	
<b>\$250,001 - \$1 Million</b>	42	13.0	8.3	19,960	58.1	54.3	26	10.7	5.5	12,827	57.6	51.8	
<b>Total</b>	324	100.0	100.0	34,347	100.0	100.0	244	100.0	100.0	22,278	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	121	89.0		3,221	40.3		94	85.5		2,387	36.3		
<b>\$100,001 - \$250,000</b>	9	6.6		1,398	17.5		11	10.0		1,771	27.0		
<b>\$250,001 - \$1 Million</b>	6	4.4		3,372	42.2		5	4.5		2,411	36.7		
<b>Total</b>	136	100.0		7,991	100.0		110	100.0		6,569	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 30140 (Lebanon, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	1.8	0	0.0	0.9	1.3
Moderate	4	36.4	15.9	416	28.5	10.2	12.1
Middle	5	45.5	63.1	754	51.7	64.2	67.8
Upper	2	18.2	19.2	289	19.8	24.7	18.8
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	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,459</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.2	0	0.0	0.7	1.3
Moderate	1	3.7	8.6	50	2.0	5.4	12.1
Middle	19	70.4	68.8	1,559	61.4	67.7	67.8
Upper	7	25.9	21.3	931	36.7	26.1	18.8
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	
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>2,540</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.5	0	0.0	0.5	1.3
Moderate	0	0.0	9.5	0	0.0	8.1	12.1
Middle	2	50.0	63.2	82	52.2	63.7	67.8
Upper	2	50.0	26.7	75	47.8	27.7	18.8
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	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>157</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	3.2	0	0.0	2.9	5.8
Moderate	0	0.0	41.9	0	0.0	27.9	45.3
Middle	0	0.0	54.8	0	0.0	69.2	29.3
Upper	0	0.0	0.0	0	0.0	0.0	19.7
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	1.4	0	0.0	0.9	1.3
Moderate	5	11.1	13.1	466	10.3	9.4	12.1
Middle	29	64.4	65.0	2,754	61.0	65.5	67.8
Upper	11	24.4	20.4	1,295	28.7	24.2	18.8
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	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>4,515</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 30140 (Lebanon, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	1	5.9	2.0	105	4.1	1.1	1	10.0	2.7	82	7.8	1.6	1.3
Moderate	5	29.4	17.1	557	21.8	12.0	2	20.0	18.0	262	24.8	12.3	12.1
Middle	10	58.8	61.7	1,748	68.4	63.3	6	60.0	60.5	662	62.7	62.6	67.8
Upper	1	5.9	19.2	147	5.7	23.6	1	10.0	18.8	50	4.7	23.5	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>2,557</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,056</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.5	0	0.0	0.3	1	2.6	0.6	98	2.3	0.3	1.3
Moderate	2	9.1	6.9	150	5.6	4.8	8	21.1	9.0	801	18.7	6.0	12.1
Middle	12	54.5	65.9	1,444	53.8	64.3	21	55.3	68.3	2,292	53.6	67.6	67.8
Upper	8	36.4	26.7	1,088	40.6	30.6	8	21.1	22.2	1,083	25.3	26.1	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,682</b>	<b>100.0</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>4,274</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.2	0	0.0	0.6	1	10.0	2.3	50	10.9	2.6	1.3
Moderate	3	27.3	9.3	85	10.2	7.4	1	10.0	8.4	25	5.5	5.4	12.1
Middle	5	45.5	62.1	415	50.0	64.4	6	60.0	64.3	343	74.9	65.5	67.8
Upper	3	27.3	27.4	330	39.8	27.6	2	20.0	25.0	40	8.7	26.6	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>830</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>458</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	10.5	0	0.0	3.0	0	0.0	9.3	0	0.0	4.3	
Moderate	0	0.0	42.1	0	0.0	9.1	0	0.0	46.5	0	0.0	26.7	45.3
Middle	1	100.0	39.5	730	100.0	32.8	0	0.0	32.6	0	0.0	31.4	29.3
Upper	0	0.0	7.9	0	0.0	55.1	0	0.0	11.6	0	0.0	37.6	19.7
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>730</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	1	1.8	1.2	105	1.4	0.8	3	5.1	1.6	230	3.9	1.0	
Moderate	10	18.2	11.7	792	10.6	8.2	12	20.3	12.9	1,135	19.5	9.6	12.1
Middle	32	58.2	63.9	4,997	67.0	62.1	33	55.9	64.5	3,297	56.5	63.9	67.8
Upper	12	21.8	23.2	1,565	21.0	28.9	11	18.6	21.0	1,173	20.1	25.4	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>7,459</b>	<b>100.0</b>	<b>100.0</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>5,835</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 30140 (Lebanon, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	1	3.1	0.8	25	1.1	2.0	1.2
Moderate	5	15.6	13.7	380	16.2	17.1	18.7
Middle	18	56.3	68.4	666	28.4	58.6	61.5
Upper	8	25.0	16.3	1,270	54.3	22.0	18.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.8	0	0.0	0.3	
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>2,341</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 30140 (Lebanon, PA)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	9.1	8.5	98	6.7	4.6	18.0
Moderate	6	54.5	24.0	803	55.0	18.8	19.0
Middle	2	18.2	23.8	138	9.5	23.8	24.8
Upper	2	18.2	29.5	420	28.8	39.5	38.2
Unknown	0	0.0	14.2	0	0.0	13.3	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,459</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	7	25.9	6.2	426	16.8	3.2	18.0
Moderate	9	33.3	17.6	904	35.6	12.9	19.0
Middle	7	25.9	21.2	454	17.9	17.9	24.8
Upper	4	14.8	38.3	756	29.8	45.7	38.2
Unknown	0	0.0	16.7	0	0.0	20.4	0.0
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>2,540</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	25.0	6.6	25	15.9	3.8	18.0
Moderate	0	0.0	18.3	0	0.0	14.8	19.0
Middle	1	25.0	27.0	28	17.8	26.5	24.8
Upper	2	50.0	47.1	104	66.2	53.5	38.2
Unknown	0	0.0	1.1	0	0.0	1.4	0.0
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>157</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	9	20.0	7.4	549	12.2	4.1	18.0
Moderate	15	33.3	20.9	1,707	37.8	16.6	19.0
Middle	10	22.2	23.0	620	13.7	21.9	24.8
Upper	8	17.8	34.1	1,280	28.3	41.7	38.2
Unknown	3	6.7	14.5	359	8.0	15.7	0.0
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>4,515</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 30140 (Lebanon, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	11.5	0	0.0	7.0	3	30.0	10.8	327	31.0	6.7	18.0
Moderate	7	41.2	25.9	910	35.6	21.4	4	40.0	22.9	455	43.1	18.2	19.0
Middle	5	29.4	24.2	870	34.0	25.6	1	10.0	23.3	136	12.9	23.7	24.8
Upper	2	11.8	24.7	403	15.8	33.4	2	20.0	25.6	138	13.1	34.4	38.2
Unknown	3	17.6	13.8	374	14.6	12.7	0	0.0	17.4	0	0.0	17.0	0.0
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>2,557</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,056</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	5	22.7	3.9	403	15.0	2.0	7	18.4	5.3	434	10.2	3.1	18.0
Moderate	6	27.3	15.3	469	17.5	10.8	11	28.9	17.3	986	23.1	13.0	19.0
Middle	4	18.2	21.2	536	20.0	19.0	11	28.9	23.4	1,477	34.6	21.3	24.8
Upper	7	31.8	37.0	1,274	47.5	43.9	9	23.7	34.5	1,377	32.2	41.6	38.2
Unknown	0	0.0	22.6	0	0.0	24.3	0	0.0	19.4	0	0.0	21.0	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,682</b>	<b>100.0</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>4,274</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.8	0	0.0	4.6	1	10.0	7.9	25	5.5	6.0	18.0
Moderate	3	27.3	16.3	205	24.7	14.8	5	50.0	17.1	173	37.8	14.4	19.0
Middle	4	36.4	24.2	400	48.2	18.4	1	10.0	26.0	135	29.5	26.1	24.8
Upper	4	36.4	52.5	225	27.1	60.4	2	20.0	47.2	75	16.4	51.7	38.2
Unknown	0	0.0	1.2	0	0.0	1.9	1	10.0	1.8	50	10.9	1.8	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>830</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>458</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	5	9.3	7.2	403	6.0	4.3	11	18.6	7.7	786	13.5	4.8	18.0
Moderate	16	29.6	19.5	1,584	23.5	15.4	20	33.9	19.5	1,614	27.7	15.3	19.0
Middle	13	24.1	22.3	1,806	26.8	21.7	13	22.0	23.2	1,748	30.0	22.3	24.8
Upper	13	24.1	32.1	1,902	28.3	39.0	13	22.0	32.2	1,590	27.2	38.8	38.2
Unknown	7	13.0	18.9	1,034	15.4	19.7	2	3.4	17.5	97	1.7	18.8	0.0
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>6,729</b>	<b>100.0</b>	<b>100.0</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>5,835</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 30140 (Lebanon, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	23	71.9	51.7	672	28.7	42.9	90.9
Over \$1 Million	9	28.1		1,669	71.3		7.6
Revenue Unknown	0	0.0		0	0.0		1.5
<b>Total</b>	<b>32</b>	<b>100.0</b>		<b>2,341</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	27	84.4	93.1	731	31.2	36.0	
\$100,001 - \$250,000	2	6.3	3.4	300	12.8	14.8	
\$250,001 - \$1 Million	3	9.4	3.5	1,310	56.0	49.2	
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>2,341</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	21	91.3		372	55.4		
\$100,001 - \$250,000	2	8.7		300	44.6		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>23</b>	<b>100.0</b>		<b>672</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 30140 (Lebanon, PA)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	26	43.3	43.3	580	13.2	29.9	25	45.5	52.4	1,233	25.9	32.7	90.9
Over \$1 Million	22	36.7		3,355	76.6		12	21.8		2,828	59.5		7.4
Revenue Unknown	12	20.0		446	10.2		18	32.7		695	14.6		1.6
<b>Total</b>	<b>60</b>	<b>100.0</b>		<b>4,381</b>	<b>100.0</b>		<b>55</b>	<b>100.0</b>		<b>4,756</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	49	81.7	86.6	1,435	32.8	30.3	41	74.5	90.3	800	16.8	32.1	
\$100,001 - \$250,000	6	10.0	7.4	788	18.0	19.1	10	18.2	5.4	1,692	35.6	18.3	
\$250,001 - \$1 Million	5	8.3	6.0	2,158	49.3	50.6	4	7.3	4.4	2,264	47.6	49.7	
<b>Total</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>	<b>4,381</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>4,756</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	26	100.0		580	100.0		21	84.0		300	24.3		
\$100,001 - \$250,000	0	0.0		0	0.0		3	12.0		587	47.6		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	4.0		346	28.1		
<b>Total</b>	<b>26</b>	<b>100.0</b>		<b>580</b>	<b>100.0</b>		<b>25</b>	<b>100.0</b>		<b>1,233</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 39740 (Reading, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	2	4.3	7.3	181	2.5	3.3	7.1
Moderate	1	2.2	5.0	54	0.7	2.9	4.1
Middle	31	67.4	61.5	4,687	64.9	60.7	61.1
Upper	12	26.1	26.2	2,305	31.9	33.1	27.7
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	
<b>Total</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>7,227</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	4	3.4	2.4	205	1.8	1.0	7.1
Moderate	4	3.4	2.6	213	1.9	1.6	4.1
Middle	74	63.8	59.2	6,182	55.3	55.7	61.1
Upper	34	29.3	35.8	4,584	41.0	41.7	27.7
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	
<b>Total</b>	<b>116</b>	<b>100.0</b>	<b>100.0</b>	<b>11,184</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	1.4	4.4	72	1.4	2.7	7.1
Moderate	1	1.4	3.4	64	1.2	2.7	4.1
Middle	42	60.9	56.4	2,889	55.2	55.2	61.1
Upper	25	36.2	35.7	2,204	42.1	39.3	27.7
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	
<b>Total</b>	<b>69</b>	<b>100.0</b>	<b>100.0</b>	<b>5,229</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	42.4	0	0.0	6.9	30.0
Moderate	1	100.0	11.9	112	100.0	0.6	6.6
Middle	0	0.0	33.9	0	0.0	57.2	45.7
Upper	0	0.0	11.9	0	0.0	35.3	17.7
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>112</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	7	2.9	5.8	458	1.8	3.0	7.1
Moderate	7	2.9	4.1	443	1.7	2.3	4.1
Middle	153	63.0	60.2	14,525	57.1	58.7	61.1
Upper	76	31.3	29.9	10,028	39.4	36.0	27.7
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	
<b>Total</b>	<b>243</b>	<b>100.0</b>	<b>100.0</b>	<b>25,454</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 39740 (Reading, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	6	12.5	6.9	433	4.8	3.1	3	7.5	8.6	390	5.4	4.2	7.1
Moderate	6	12.5	5.9	476	5.3	3.5	4	10.0	5.4	574	7.9	3.4	4.1
Middle	24	50.0	61.5	4,489	49.5	61.0	23	57.5	60.7	3,826	52.9	60.2	61.1
Upper	12	25.0	25.7	3,668	40.5	32.5	10	25.0	25.3	2,441	33.8	32.2	27.7
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	
<b>Total</b>	<b>48</b>	<b>100.0</b>	<b>100.0</b>	<b>9,066</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>7,231</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	4	4.3	1.5	258	2.2	0.7	4	3.5	2.3	275	1.7	1.2	7.1
Moderate	2	2.1	1.5	128	1.1	0.8	1	0.9	2.1	40	0.2	1.3	4.1
Middle	65	69.1	60.1	7,729	66.3	56.2	78	67.8	60.6	9,826	61.2	56.8	61.1
Upper	23	24.5	36.9	3,541	30.4	42.3	32	27.8	34.9	5,918	36.9	40.7	27.7
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	
<b>Total</b>	<b>94</b>	<b>100.0</b>	<b>100.0</b>	<b>11,656</b>	<b>100.0</b>	<b>100.0</b>	<b>115</b>	<b>100.0</b>	<b>100.0</b>	<b>16,059</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	4.2	3.1	90	2.6	2.0	1	2.0	5.5	50	1.0	4.0	7.1
Moderate	0	0.0	2.2	0	0.0	1.8	1	2.0	2.1	53	1.1	1.6	4.1
Middle	28	58.3	59.1	1,579	46.4	56.0	28	56.0	60.4	2,429	50.8	58.4	61.1
Upper	18	37.5	35.6	1,735	51.0	40.3	20	40.0	32.0	2,252	47.1	35.9	27.7
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	
<b>Total</b>	<b>48</b>	<b>100.0</b>	<b>100.0</b>	<b>3,404</b>	<b>100.0</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>4,784</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	21.4	0	0.0	6.9	0	0.0	37.7	0	0.0	43.2	
Moderate	1	50.0	17.1	92	72.4	5.1	0	0.0	13.1	0	0.0	2.6	6.6
Middle	0	0.0	42.9	0	0.0	70.2	0	0.0	47.5	0	0.0	53.8	45.7
Upper	1	50.0	18.6	35	27.6	17.8	0	0.0	1.6	0	0.0	0.3	17.7
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	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>127</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	16	7.3	4.2	945	3.4	2.0	8	3.8	5.1	715	2.5	3.8	
Moderate	9	4.1	3.6	696	2.5	2.2	6	2.8	3.5	667	2.3	2.3	4.1
Middle	137	62.6	60.5	16,409	59.5	58.8	133	62.7	60.6	16,515	56.7	58.3	61.1
Upper	57	26.0	31.6	9,543	34.6	37.0	65	30.7	30.8	11,221	38.5	35.6	27.7
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	
<b>Total</b>	<b>219</b>	<b>100.0</b>	<b>100.0</b>	<b>27,593</b>	<b>100.0</b>	<b>100.0</b>	<b>212</b>	<b>100.0</b>	<b>100.0</b>	<b>29,118</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 39740 (Reading, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	5	2.9	7.4	1,187	7.0	7.8	9.2
Moderate	5	2.9	4.2	560	3.3	4.6	5.2
Middle	115	67.3	58.4	10,165	60.3	58.8	58.7
Upper	46	26.9	28.5	4,935	29.3	28.3	26.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.4	0	0.0	0.5	
<b>Total</b>	<b>171</b>	<b>100.0</b>	<b>100.0</b>	<b>16,847</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 39740 (Reading, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	28	6.8	8.9	2,335	5.7	9.5	25	8.1	9.2	2,089	7.8	7.9	9.3
Moderate	20	4.9	4.8	1,790	4.4	5.0	17	5.5	4.8	1,926	7.2	4.7	5.2
Middle	266	65.0	57.7	25,353	62.1	58.5	199	64.2	57.1	17,224	64.1	58.5	58.3
Upper	95	23.2	28.3	11,321	27.7	26.9	69	22.3	28.4	5,651	21.0	28.8	27.2
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	0.3	0	0.0	0.1	0	0.0	0.6	0	0.0	0.1	
<b>Total</b>	<b>409</b>	<b>100.0</b>	<b>100.0</b>	<b>40,799</b>	<b>100.0</b>	<b>100.0</b>	<b>310</b>	<b>100.0</b>	<b>100.0</b>	<b>26,890</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 39740 (Reading, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	8	17.4	11.9	755	10.4	6.7	21.4
<b>Moderate</b>	11	23.9	24.6	1,429	19.8	19.8	17.1
<b>Middle</b>	8	17.4	22.5	1,298	18.0	23.0	21.4
<b>Upper</b>	15	32.6	27.3	2,973	41.1	37.3	40.1
<b>Unknown</b>	4	8.7	13.8	772	10.7	13.2	0.0
<b>Total</b>	46	100.0	100.0	7,227	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	24	20.7	8.8	1,235	11.0	4.7	21.4
<b>Moderate</b>	30	25.9	17.3	2,300	20.6	12.2	17.1
<b>Middle</b>	29	25.0	21.5	2,817	25.2	19.0	21.4
<b>Upper</b>	25	21.6	36.4	3,571	31.9	43.7	40.1
<b>Unknown</b>	8	6.9	15.9	1,261	11.3	20.3	0.0
<b>Total</b>	116	100.0	100.0	11,184	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	8	11.6	8.6	419	8.0	6.9	21.4
<b>Moderate</b>	15	21.7	16.6	1,064	20.3	16.1	17.1
<b>Middle</b>	21	30.4	25.5	1,542	29.5	21.9	21.4
<b>Upper</b>	25	36.2	47.1	2,204	42.1	53.3	40.1
<b>Unknown</b>	0	0.0	2.0	0	0.0	1.9	0.0
<b>Total</b>	69	100.0	100.0	5,229	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	40	16.5	10.2	2,409	9.5	5.9	21.4
<b>Moderate</b>	56	23.1	21.1	4,793	18.9	16.9	17.1
<b>Middle</b>	58	24.0	21.8	5,657	22.3	21.3	21.4
<b>Upper</b>	65	26.9	31.5	8,748	34.5	39.3	40.1
<b>Unknown</b>	23	9.5	15.4	3,735	14.7	16.6	0.0
<b>Total</b>	242	100.0	100.0	25,342	100.0	100.0	100.0



Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 39740 (Reading, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	11	22.9	12.6	910	10.0	7.2	11	27.5	13.9	1,502	20.8	8.3	21.4
Moderate	9	18.8	26.0	1,178	13.0	21.1	15	37.5	24.7	2,365	32.7	20.5	17.1
Middle	12	25.0	22.8	2,097	23.1	24.0	9	22.5	21.6	1,774	24.5	22.4	21.4
Upper	14	29.2	25.4	4,533	50.0	35.4	4	10.0	23.7	1,458	20.2	33.1	40.1
Unknown	2	4.2	13.2	348	3.8	12.2	1	2.5	16.0	132	1.8	15.7	0.0
<b>Total</b>	<b>48</b>	<b>100.0</b>	<b>100.0</b>	<b>9,066</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>7,231</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	12	12.8	4.4	750	6.4	2.3	24	20.9	6.0	2,091	13.0	3.5	21.4
Moderate	26	27.7	15.2	2,796	24.0	10.6	28	24.3	17.7	3,126	19.5	13.5	17.1
Middle	23	24.5	21.8	2,794	24.0	19.6	25	21.7	23.4	3,149	19.6	21.5	21.4
Upper	31	33.0	40.5	4,980	42.7	47.6	36	31.3	35.7	7,129	44.4	43.2	40.1
Unknown	2	2.1	18.1	336	2.9	19.8	2	1.7	17.2	564	3.5	18.4	0.0
<b>Total</b>	<b>94</b>	<b>100.0</b>	<b>100.0</b>	<b>11,656</b>	<b>100.0</b>	<b>100.0</b>	<b>115</b>	<b>100.0</b>	<b>100.0</b>	<b>16,059</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	6	12.5	7.1	305	9.0	5.3	4	8.0	6.7	155	3.2	5.5	21.4
Moderate	17	35.4	16.9	980	28.8	14.4	7	14.0	20.5	688	14.4	15.7	17.1
Middle	7	14.6	24.3	394	11.6	20.7	14	28.0	24.4	1,059	22.1	22.5	21.4
Upper	17	35.4	50.2	1,685	49.5	57.8	25	50.0	46.7	2,882	60.2	54.2	40.1
Unknown	1	2.1	1.5	40	1.2	1.9	0	0.0	1.8	0	0.0	2.1	0.0
<b>Total</b>	<b>48</b>	<b>100.0</b>	<b>100.0</b>	<b>3,404</b>	<b>100.0</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>4,784</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	29	13.4	7.9	1,965	7.2	4.5	39	18.4	9.2	3,748	12.9	5.7	21.4
Moderate	52	24.0	19.1	4,954	18.0	15.1	50	23.6	20.4	6,179	21.2	16.5	17.1
Middle	42	19.4	21.7	5,285	19.2	21.1	48	22.6	22.6	5,982	20.5	21.8	21.4
Upper	62	28.6	33.1	11,198	40.8	41.2	65	30.7	31.4	11,469	39.4	38.8	40.1
Unknown	32	14.7	18.1	4,064	14.8	18.1	10	4.7	16.4	1,740	6.0	17.2	0.0
<b>Total</b>	<b>217</b>	<b>100.0</b>	<b>100.0</b>	<b>27,466</b>	<b>100.0</b>	<b>100.0</b>	<b>212</b>	<b>100.0</b>	<b>100.0</b>	<b>29,118</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 39740 (Reading, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	126	73.7	47.9	7,148	42.4	36.0	89.8
<b>Over \$1 Million</b>	42	24.6		8,516	50.5		8.7
<b>Revenue Unknown</b>	3	1.8		1,183	7.0		1.4
<b>Total</b>	171	100.0		16,847	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	135	78.9	90.7	3,489	20.7	31.2	
<b>\$100,001 - \$250,000</b>	16	9.4	4.8	2,471	14.7	17.9	
<b>\$250,001 - \$1 Million</b>	20	11.7	4.5	10,887	64.6	50.9	
<b>Total</b>	171	100.0	100.0	16,847	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	112	88.9		2,562	35.8		
<b>\$100,001 - \$250,000</b>	8	6.3		1,311	18.3		
<b>\$250,001 - \$1 Million</b>	6	4.8		3,275	45.8		
<b>Total</b>	126	100.0		7,148	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 39740 (Reading, PA)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	170	41.6	41.1	8,531	20.9	26.2	127	41.0	50.1	5,027	18.7	34.3	90.2
<b>Over \$1 Million</b>	109	26.7		23,311	57.1		62	20.0		15,699	58.4		8.3
<b>Revenue Unknown</b>	130	31.8		8,957	22.0		121	39.0		6,164	22.9		1.5
<b>Total</b>	409	100.0		40,799	100.0		310	100.0		26,890	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	313	76.5	83.8	10,372	25.4	26.8	249	80.3	89.4	6,975	25.9	29.4	
<b>\$100,001 - \$250,000</b>	53	13.0	9.0	8,220	20.1	21.2	39	12.6	5.7	6,688	24.9	19.2	
<b>\$250,001 - \$1 Million</b>	43	10.5	7.2	22,207	54.4	52.0	22	7.1	4.8	13,227	49.2	51.4	
<b>Total</b>	409	100.0	100.0	40,799	100.0	100.0	310	100.0	100.0	26,890	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	157	92.4		4,674	54.8		116	91.3		3,092	61.5		
<b>\$100,001 - \$250,000</b>	8	4.7		1,348	15.8		11	8.7		1,935	38.5		
<b>\$250,001 - \$1 Million</b>	5	2.9		2,509	29.4		0	0.0		0	0.0		
<b>Total</b>	170	100.0		8,531	100.0		127	100.0		5,027	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 42540 (Scranton--Wilkes-Barre, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	1.2	1.9	153	1.3	1.2	1.6
Moderate	13	16.0	15.6	1,265	10.7	10.5	14.2
Middle	39	48.1	50.0	4,875	41.4	45.1	56.5
Upper	28	34.6	32.5	5,477	46.5	43.2	27.5
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	
<b>Total</b>	<b>81</b>	<b>100.0</b>	<b>100.0</b>	<b>11,770</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	1.3	1.1	95	0.7	0.5	1.6
Moderate	14	9.3	10.5	980	7.3	6.8	14.2
Middle	94	62.7	52.9	7,778	58.3	49.0	56.5
Upper	40	26.7	35.6	4,498	33.7	43.7	27.5
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	
<b>Total</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>13,351</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.0	0	0.0	0.6	1.6
Moderate	4	8.0	11.3	179	6.1	8.7	14.2
Middle	22	44.0	52.2	1,288	43.9	50.0	56.5
Upper	24	48.0	35.5	1,468	50.0	40.8	27.5
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	
<b>Total</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>2,935</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	2.4	0	0.0	3.3	10.5
Moderate	0	0.0	31.2	0	0.0	24.5	35.6
Middle	0	0.0	49.6	0	0.0	39.7	39.5
Upper	0	0.0	12.8	0	0.0	17.6	10.8
Unknown	0	0.0	4.0	0	0.0	15.0	3.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	3	1.0	1.5	248	0.8	1.1	1.6
Moderate	32	10.7	13.4	2,526	8.4	10.0	14.2
Middle	166	55.3	51.8	14,840	49.6	46.6	56.5
Upper	99	33.0	33.3	12,333	41.2	41.6	27.5
Unknown	0	0.0	0.0	0	0.0	0.8	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>300</b>	<b>100.0</b>	<b>100.0</b>	<b>29,947</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 42540 (Scranton--Wilkes-Barre, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	1.7	0	0.0	1.1	5	4.9	2.3	461	3.4	1.6	1.6
Moderate	12	10.3	16.6	1,068	5.6	11.5	22	21.6	18.5	2,054	15.3	13.5	14.2
Middle	72	61.5	50.4	11,134	58.7	46.7	53	52.0	51.5	6,301	47.1	48.2	56.5
Upper	33	28.2	31.2	6,778	35.7	40.7	22	21.6	27.6	4,568	34.1	36.6	27.5
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	
<b>Total</b>	<b>117</b>	<b>100.0</b>	<b>100.0</b>	<b>18,980</b>	<b>100.0</b>	<b>100.0</b>	<b>102</b>	<b>100.0</b>	<b>100.0</b>	<b>13,384</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	1.8	0.8	116	0.6	0.5	2	0.8	0.9	143	0.5	0.7	1.6
Moderate	12	7.3	7.3	941	5.1	4.7	19	7.7	9.0	1,228	4.2	6.2	14.2
Middle	85	51.8	51.2	9,192	49.6	46.9	134	54.5	51.5	14,083	48.7	46.7	56.5
Upper	64	39.0	40.7	8,283	44.7	47.9	91	37.0	38.6	13,463	46.6	46.4	27.5
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	
<b>Total</b>	<b>164</b>	<b>100.0</b>	<b>100.0</b>	<b>18,532</b>	<b>100.0</b>	<b>100.0</b>	<b>246</b>	<b>100.0</b>	<b>100.0</b>	<b>28,917</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	2.8	1.6	108	2.5	1.1	0	0.0	0.8	0	0.0	0.5	1.6
Moderate	4	5.6	8.9	164	3.7	7.9	7	12.1	9.7	531	11.9	7.6	14.2
Middle	40	56.3	55.6	2,296	52.2	51.6	34	58.6	53.7	2,527	56.7	50.4	56.5
Upper	25	35.2	33.9	1,828	41.6	39.3	17	29.3	35.6	1,399	31.4	41.2	27.5
Unknown	0	0.0	0.0	0	0.0	0.0	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	
<b>Total</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>4,396</b>	<b>100.0</b>	<b>100.0</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>4,457</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	4.1	0	0.0	19.7	0	0.0	1.6	0	0.0	1.7	
Moderate	0	0.0	28.7	0	0.0	26.8	0	0.0	37.1	0	0.0	37.4	35.6
Middle	2	100.0	55.7	316	100.0	34.4	1	100.0	50.5	170	100.0	29.9	39.5
Upper	0	0.0	10.7	0	0.0	17.3	0	0.0	8.1	0	0.0	7.0	10.8
Unknown	0	0.0	0.8	0	0.0	1.8	0	0.0	2.7	0	0.0	24.1	3.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>316</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>170</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	7	1.8	1.4	327	0.7	1.8	8	1.9	1.5	649	1.3	1.2	
Moderate	37	9.4	12.0	2,897	6.3	9.1	51	12.0	13.6	4,026	8.3	11.3	14.2
Middle	218	55.6	51.4	24,828	54.3	46.5	231	54.2	51.8	24,007	49.2	46.8	56.5
Upper	130	33.2	35.1	17,677	38.7	42.5	136	31.9	33.0	20,103	41.2	39.5	27.5
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0	0.0	1.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>392</b>	<b>100.0</b>	<b>100.0</b>	<b>45,729</b>	<b>100.0</b>	<b>100.0</b>	<b>426</b>	<b>100.0</b>	<b>100.0</b>	<b>48,785</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 42540 (Scranton--Wilkes-Barre, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	5	2.0	2.7	348	1.8	2.9	2.3
Moderate	29	11.7	17.4	2,494	12.6	14.6	18.5
Middle	140	56.7	52.1	10,855	54.7	56.7	53.1
Upper	71	28.7	25.3	6,061	30.5	23.2	24.2
Unknown	2	0.8	1.7	100	0.5	2.2	1.8
Tract-Unk	0	0.0	0.9	0	0.0	0.4	
<b>Total</b>	<b>247</b>	<b>100.0</b>	<b>100.0</b>	<b>19,858</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 42540 (Scranton--Wilkes-Barre, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	9	1.7	2.4	562	1.3	1.9	12	2.9	2.3	472	1.6	2.1	2.5
Moderate	75	14.2	17.7	8,503	19.4	16.4	53	12.6	17.0	3,508	11.8	16.4	18.4
Middle	266	50.4	51.5	21,379	48.9	55.0	212	50.4	52.3	18,111	60.9	55.2	52.6
Upper	164	31.1	26.4	12,508	28.6	24.6	135	32.1	26.4	7,122	23.9	24.2	24.7
Unknown	14	2.7	1.5	772	1.8	1.9	9	2.1	1.5	537	1.8	2.0	1.8
Tract-Unk	0	0.0	0.4	0	0.0	0.2	0	0.0	0.5	0	0.0	0.1	
<b>Total</b>	<b>528</b>	<b>100.0</b>	<b>100.0</b>	<b>43,724</b>	<b>100.0</b>	<b>100.0</b>	<b>421</b>	<b>100.0</b>	<b>100.0</b>	<b>29,750</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 42540 (Scranton--Wilkes-Barre, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	7	8.6	9.9	501	4.3	5.7	21.3
<b>Moderate</b>	22	27.2	22.8	2,218	18.8	16.9	17.7
<b>Middle</b>	15	18.5	22.6	2,174	18.5	21.4	20.4
<b>Upper</b>	33	40.7	30.6	6,231	52.9	44.1	40.6
<b>Unknown</b>	4	4.9	14.1	646	5.5	11.9	0.0
<b>Total</b>	81	100.0	100.0	11,770	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	25	16.7	8.6	1,559	11.7	4.4	21.3
<b>Moderate</b>	34	22.7	16.3	2,583	19.3	10.6	17.7
<b>Middle</b>	43	28.7	22.2	3,480	26.1	18.1	20.4
<b>Upper</b>	47	31.3	39.5	5,549	41.6	50.5	40.6
<b>Unknown</b>	1	0.7	13.5	180	1.3	16.5	0.0
<b>Total</b>	150	100.0	100.0	13,351	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	3	6.0	8.2	155	5.3	6.1	21.3
<b>Moderate</b>	11	22.0	17.9	379	12.9	13.8	17.7
<b>Middle</b>	13	26.0	25.2	683	23.3	22.3	20.4
<b>Upper</b>	23	46.0	45.4	1,718	58.5	52.8	40.6
<b>Unknown</b>	0	0.0	3.3	0	0.0	4.9	0.0
<b>Total</b>	50	100.0	100.0	2,935	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	35	11.7	9.1	2,215	7.4	5.2	21.3
<b>Moderate</b>	67	22.3	19.4	5,180	17.3	14.3	17.7
<b>Middle</b>	71	23.7	22.4	6,337	21.2	20.1	20.4
<b>Upper</b>	103	34.3	34.7	13,498	45.1	45.8	40.6
<b>Unknown</b>	24	8.0	14.4	2,717	9.1	14.5	0.0
<b>Total</b>	300	100.0	100.0	29,947	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 42540 (Scranton--Wilkes-Barre, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	15	12.8	12.2	1,221	6.4	7.4	23	22.5	11.0	2,403	18.0	7.1	21.3
Moderate	30	25.6	23.1	3,239	17.1	18.1	33	32.4	21.7	3,876	29.0	16.8	17.7
Middle	33	28.2	21.2	5,410	28.5	20.9	17	16.7	19.5	2,114	15.8	18.7	20.4
Upper	32	27.4	28.8	7,954	41.9	40.7	26	25.5	27.2	4,789	35.8	38.6	40.6
Unknown	7	6.0	14.7	1,156	6.1	13.0	3	2.9	20.6	202	1.5	18.8	0.0
<b>Total</b>	<b>117</b>	<b>100.0</b>	<b>100.0</b>	<b>18,980</b>	<b>100.0</b>	<b>100.0</b>	<b>102</b>	<b>100.0</b>	<b>100.0</b>	<b>13,384</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	18	11.0	4.4	1,119	6.0	2.1	27	11.0	5.8	1,692	5.9	3.2	21.3
Moderate	37	22.6	11.9	3,665	19.8	7.6	57	23.2	15.3	5,295	18.3	10.6	17.7
Middle	38	23.2	20.7	3,808	20.5	17.1	63	25.6	21.9	6,879	23.8	18.9	20.4
Upper	65	39.6	43.5	9,449	51.0	53.2	95	38.6	40.0	14,505	50.2	49.3	40.6
Unknown	6	3.7	19.5	491	2.6	19.9	4	1.6	16.9	546	1.9	18.0	0.0
<b>Total</b>	<b>164</b>	<b>100.0</b>	<b>100.0</b>	<b>18,532</b>	<b>100.0</b>	<b>100.0</b>	<b>246</b>	<b>100.0</b>	<b>100.0</b>	<b>28,917</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	12	16.9	9.3	545	12.4	6.3	7	12.1	7.4	393	8.8	5.3	21.3
Moderate	17	23.9	17.8	961	21.9	13.9	6	10.3	18.4	292	6.6	13.9	17.7
Middle	19	26.8	24.8	1,347	30.6	25.3	17	29.3	22.8	1,241	27.8	19.7	20.4
Upper	22	31.0	45.2	1,443	32.8	51.6	26	44.8	48.4	2,460	55.2	58.2	40.6
Unknown	1	1.4	2.8	100	2.3	2.9	2	3.4	2.9	71	1.6	2.9	0.0
<b>Total</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>4,396</b>	<b>100.0</b>	<b>100.0</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>4,457</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	45	11.5	8.0	2,885	6.4	4.6	57	13.4	8.2	4,488	9.2	5.2	21.3
Moderate	84	21.5	16.7	7,865	17.3	12.3	96	22.6	18.2	9,463	19.5	13.7	17.7
Middle	90	23.1	20.5	10,565	23.3	18.7	97	22.8	20.7	10,234	21.1	18.7	20.4
Upper	119	30.5	36.0	18,846	41.5	46.4	147	34.6	34.6	21,754	44.7	44.0	40.6
Unknown	52	13.3	18.8	5,252	11.6	18.0	28	6.6	18.3	2,676	5.5	18.3	0.0
<b>Total</b>	<b>390</b>	<b>100.0</b>	<b>100.0</b>	<b>45,413</b>	<b>100.0</b>	<b>100.0</b>	<b>425</b>	<b>100.0</b>	<b>100.0</b>	<b>48,615</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 42540 (Scranton--Wilkes-Barre, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	188	76.1	42.9	8,088	40.7	35.2	90.2
Over \$1 Million	54	21.9		11,342	57.1		8.2
Revenue Unknown	5	2.0		428	2.2		1.5
<b>Total</b>	<b>247</b>	<b>100.0</b>		<b>19,858</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	208	84.2	92.0	5,251	26.4	35.1	
\$100,001 - \$250,000	19	7.7	4.3	3,041	15.3	18.3	
\$250,001 - \$1 Million	20	8.1	3.7	11,566	58.2	46.6	
<b>Total</b>	<b>247</b>	<b>100.0</b>	<b>100.0</b>	<b>19,858</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	174	92.6		3,895	48.2		
\$100,001 - \$250,000	10	5.3		1,281	15.8		
\$250,001 - \$1 Million	4	2.1		2,912	36.0		
<b>Total</b>	<b>188</b>	<b>100.0</b>		<b>8,088</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 42540 (Scranton--Wilkes-Barre, PA)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
<b>By Revenue</b>													
\$1 Million or Less	273	51.7	31.8	12,629	28.9	22.4	197	46.8	40.2	9,878	33.2	26.2	90.4
Over \$1 Million	125	23.7		23,709	54.2		88	20.9		13,838	46.5		8.0
Revenue Unknown	130	24.6		7,386	16.9		136	32.3		6,034	20.3		1.6
<b>Total</b>	<b>528</b>	<b>100.0</b>		<b>43,724</b>	<b>100.0</b>		<b>421</b>	<b>100.0</b>		<b>29,750</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	422	79.9	86.1	13,780	31.5	30.9	345	81.9	89.6	9,215	31.0	31.9	
\$100,001 - \$250,000	68	12.9	8.4	11,117	25.4	22.9	49	11.6	6.2	7,926	26.6	21.4	
\$250,001 - \$1 Million	38	7.2	5.5	18,827	43.1	46.2	27	6.4	4.3	12,609	42.4	46.7	
<b>Total</b>	<b>528</b>	<b>100.0</b>	<b>100.0</b>	<b>43,724</b>	<b>100.0</b>	<b>100.0</b>	<b>421</b>	<b>100.0</b>	<b>100.0</b>	<b>29,750</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	251	91.9		7,299	57.8		178	90.4		4,482	45.4		
\$100,001 - \$250,000	16	5.9		2,536	20.1		13	6.6		2,031	20.6		
\$250,001 - \$1 Million	6	2.2		2,794	22.1		6	3.0		3,365	34.1		
<b>Total</b>	<b>273</b>	<b>100.0</b>		<b>12,629</b>	<b>100.0</b>		<b>197</b>	<b>100.0</b>		<b>9,878</b>	<b>100.0</b>		



Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 44300 (State College, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	16.7	17.4	865	13.4	13.8	16.0
Middle	16	53.3	45.2	3,210	49.6	41.0	51.7
Upper	9	30.0	36.6	2,403	37.1	44.1	31.5
Unknown	0	0.0	0.9	0	0.0	1.1	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>6,478</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	10.0	14.9	300	7.3	12.7	16.0
Middle	21	70.0	47.9	2,416	58.9	41.6	51.7
Upper	6	20.0	36.2	1,385	33.8	42.9	31.5
Unknown	0	0.0	1.0	0	0.0	2.8	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>4,101</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	9.1	15.1	39	2.9	13.3	16.0
Middle	16	72.7	44.8	1,126	84.0	37.5	51.7
Upper	4	18.2	39.3	175	13.1	47.8	31.5
Unknown	0	0.0	0.8	0	0.0	1.4	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>1,340</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.4
Moderate	2	66.7	53.7	368	2.2	13.1	37.1
Middle	1	33.3	31.7	16,605	97.8	20.0	28.8
Upper	0	0.0	14.6	0	0.0	66.9	7.6
Unknown	0	0.0	0.0	0	0.0	0.0	26.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>16,973</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	12	14.1	16.7	1,572	5.4	13.6	16.0
Middle	54	63.5	46.3	23,357	80.8	37.8	51.7
Upper	19	22.4	36.1	3,963	13.7	47.1	31.5
Unknown	0	0.0	0.9	0	0.0	1.5	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>28,892</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 44300 (State College, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Moderate	5	11.4	18.2	942	8.6	15.5	9	23.1	18.8	1,703	16.9	15.6	16.0
Middle	24	54.5	44.7	5,790	52.7	39.4	15	38.5	43.6	3,074	30.6	39.7	51.7
Upper	15	34.1	35.9	4,249	38.7	43.8	15	38.5	36.3	5,282	52.5	42.8	31.5
Unknown	0	0.0	1.2	0	0.0	1.3	0	0.0	1.2	0	0.0	1.8	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>10,981</b>	<b>100.0</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>10,059</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	12.9	12.4	946	7.7	10.1	7	14.3	13.7	1,018	12.6	12.3	16.0
Middle	33	53.2	45.5	5,781	47.1	41.8	30	61.2	46.9	4,148	51.4	42.1	51.7
Upper	21	33.9	41.1	5,549	45.2	46.8	12	24.5	38.0	2,901	36.0	43.6	31.5
Unknown	0	0.0	1.0	0	0.0	1.3	0	0.0	1.5	0	0.0	1.9	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>12,276</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>8,067</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	10.0	16.3	60	3.0	15.1	2	22.2	13.5	70	7.9	14.5	16.0
Middle	10	50.0	50.7	779	38.8	45.3	6	66.7	48.9	470	53.1	42.6	51.7
Upper	8	40.0	31.6	1,170	58.2	35.6	1	11.1	36.2	345	39.0	41.9	31.5
Unknown	0	0.0	1.4	0	0.0	4.0	0	0.0	1.4	0	0.0	1.0	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>2,009</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>885</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	50.0	0	0.0	54.0	0	0.0	43.2	0	0.0	49.7	37.1
Middle	0	0.0	29.4	0	0.0	14.5	1	100.0	43.2	686	100.0	36.2	28.8
Upper	0	0.0	5.9	0	0.0	17.3	0	0.0	8.1	0	0.0	9.8	7.6
Unknown	2	100.0	14.7	790	100.0	14.2	0	0.0	5.4	0	0.0	4.3	26.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>790</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>686</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	15	11.7	14.6	1,948	7.5	13.8	18	18.2	15.7	2,791	14.1	15.8	16.0
Middle	67	52.3	45.8	12,350	47.4	40.0	53	53.5	46.1	8,455	42.8	41.0	51.7
Upper	44	34.4	38.4	10,968	42.1	44.3	28	28.3	36.9	8,528	43.1	41.2	31.5
Unknown	2	1.6	1.2	790	3.0	1.9	0	0.0	1.4	0	0.0	2.0	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>128</b>	<b>100.0</b>	<b>100.0</b>	<b>26,056</b>	<b>100.0</b>	<b>100.0</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>19,774</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 44300 (State College, PA)							
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	0.1
Moderate	8	16.3	18.2	1,209	15.9	17.3	18.4
Middle	25	51.0	41.2	3,567	46.9	48.1	40.3
Upper	14	28.6	32.5	2,340	30.7	27.9	30.5
Unknown	2	4.1	7.0	496	6.5	6.2	10.7
Tract-Unk	0	0.0	1.1	0	0.0	0.5	
<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>7,612</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 44300 (State College, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	25	22.9	17.5	4,552	32.9	17.6	26	34.7	18.3	4,703	50.6	18.8	18.4
Middle	49	45.0	41.6	5,831	42.2	41.4	32	42.7	41.9	2,226	23.9	40.9	40.7
Upper	28	25.7	29.5	3,254	23.5	28.3	14	18.7	30.7	2,240	24.1	31.3	31.0
Unknown	7	6.4	10.8	195	1.4	12.1	3	4.0	8.6	134	1.4	9.0	9.9
Tract-Unk	0	0.0	0.5	0	0.0	0.7	0	0.0	0.4	0	0.0	0.0	
<b>Total</b>	<b>109</b>	<b>100.0</b>	<b>100.0</b>	<b>13,832</b>	<b>100.0</b>	<b>100.0</b>	<b>75</b>	<b>100.0</b>	<b>100.0</b>	<b>9,303</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 44300 (State College, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>					<b>Families by Family Income %</b>	
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>			<b>Agg</b>
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>		<b>%</b>
<b>Home Purchase Loans</b>							
<b>Low</b>	3	10.0	10.1	466	7.2	5.4	19.6
<b>Moderate</b>	11	36.7	19.1	1,983	30.6	14.5	18.5
<b>Middle</b>	4	13.3	26.1	799	12.3	25.6	21.5
<b>Upper</b>	11	36.7	36.7	3,019	46.6	47.0	40.3
<b>Unknown</b>	1	3.3	8.0	211	3.3	7.5	0.0
<b>Total</b>	30	100.0	100.0	6,478	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	8	26.7	10.7	712	17.4	5.4	19.6
<b>Moderate</b>	5	16.7	18.9	508	12.4	13.4	18.5
<b>Middle</b>	8	26.7	22.8	892	21.8	20.8	21.5
<b>Upper</b>	6	20.0	34.8	1,628	39.7	43.0	40.3
<b>Unknown</b>	3	10.0	12.9	361	8.8	17.4	0.0
<b>Total</b>	30	100.0	100.0	4,101	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	7	31.8	10.1	310	23.1	8.1	19.6
<b>Moderate</b>	5	22.7	22.4	210	15.7	19.5	18.5
<b>Middle</b>	4	18.2	21.4	245	18.3	18.4	21.5
<b>Upper</b>	6	27.3	43.1	575	42.9	49.9	40.3
<b>Unknown</b>	0	0.0	3.0	0	0.0	4.1	0.0
<b>Total</b>	22	100.0	100.0	1,340	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	18	22.0	10.7	1,488	12.5	5.7	19.6
<b>Moderate</b>	21	25.6	19.5	2,701	22.7	14.2	18.5
<b>Middle</b>	16	19.5	24.2	1,936	16.2	23.3	21.5
<b>Upper</b>	23	28.0	36.0	5,222	43.8	45.2	40.3
<b>Unknown</b>	4	4.9	9.6	572	4.8	11.7	0.0
<b>Total</b>	82	100.0	100.0	11,919	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 44300 (State College, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	6	13.6	8.8	851	7.7	4.3	3	7.7	7.9	481	4.8	4.1	19.6
Moderate	9	20.5	17.2	1,802	16.4	12.4	10	25.6	18.3	2,537	25.2	13.5	18.5
Middle	10	22.7	24.4	2,491	22.7	22.8	14	35.9	23.0	3,340	33.2	22.2	21.5
Upper	17	38.6	42.0	5,648	51.4	53.1	11	28.2	40.1	3,594	35.7	50.4	40.3
Unknown	2	4.5	7.7	189	1.7	7.4	1	2.6	10.7	107	1.1	9.7	0.0
<b>Total</b>	<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>10,981</b>	<b>100.0</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>10,059</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	8	12.9	5.5	681	5.5	2.9	4	8.2	6.5	427	5.3	3.3	19.6
Moderate	14	22.6	14.9	2,020	16.5	10.5	13	26.5	16.7	1,481	18.4	11.5	18.5
Middle	13	21.0	24.5	1,841	15.0	21.9	15	30.6	24.8	1,949	24.2	22.8	21.5
Upper	23	37.1	42.2	7,036	57.3	50.9	15	30.6	39.7	3,727	46.2	48.6	40.3
Unknown	4	6.5	13.0	698	5.7	13.7	2	4.1	12.3	483	6.0	13.7	0.0
<b>Total</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>12,276</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>8,067</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	4	20.0	8.7	259	12.9	6.6	1	11.1	7.5	25	2.8	6.1	19.6
Moderate	6	30.0	18.4	556	27.7	14.1	3	33.3	15.5	250	28.2	12.0	18.5
Middle	6	30.0	25.7	580	28.9	22.7	2	22.2	25.9	395	44.6	22.1	21.5
Upper	4	20.0	44.8	614	30.6	53.8	2	22.2	49.7	105	11.9	57.6	40.3
Unknown	0	0.0	2.4	0	0.0	2.8	1	11.1	1.4	110	12.4	2.2	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>2,009</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>885</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	18	14.3	6.8	1,791	7.1	3.5	8	8.2	7.1	933	4.9	3.7	19.6
Moderate	29	23.0	15.8	4,378	17.3	11.2	26	26.5	17.3	4,268	22.4	12.5	18.5
Middle	29	23.0	24.2	4,912	19.4	22.1	31	31.6	24.0	5,684	29.8	22.4	21.5
Upper	44	34.9	42.0	13,298	52.6	51.5	28	28.6	40.5	7,426	38.9	49.5	40.3
Unknown	6	4.8	11.2	887	3.5	11.6	5	5.1	11.1	777	4.1	11.8	0.0
<b>Total</b>	<b>126</b>	<b>100.0</b>	<b>100.0</b>	<b>25,266</b>	<b>100.0</b>	<b>100.0</b>	<b>98</b>	<b>100.0</b>	<b>100.0</b>	<b>19,088</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 44300 (State College, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	28	57.1	46.3	2,029	26.7	32.3	91.1
Over \$1 Million	20	40.8		5,568	73.1		7.8
Revenue Unknown	1	2.0		15	0.2		1.1
<b>Total</b>	<b>49</b>	<b>100.0</b>		<b>7,612</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	32	65.3	94.1	953	12.5	37.3	
\$100,001 - \$250,000	7	14.3	2.7	1,140	15.0	13.2	
\$250,001 - \$1 Million	10	20.4	3.2	5,519	72.5	49.6	
<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>7,612</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	23	82.1		373	18.4		
\$100,001 - \$250,000	3	10.7		519	25.6		
\$250,001 - \$1 Million	2	7.1		1,137	56.0		
<b>Total</b>	<b>28</b>	<b>100.0</b>		<b>2,029</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 44300 (State College, PA)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	58	53.2	41.9	4,451	32.2	28.1	23	30.7	52.1	2,243	24.1	33.3	91.4
Over \$1 Million	30	27.5		8,638	62.4		13	17.3		4,693	50.4		7.4
Revenue Unknown	21	19.3		743	5.4		39	52.0		2,367	25.4		1.2
<b>Total</b>	<b>109</b>	<b>100.0</b>	<b>100.0</b>	<b>13,832</b>	<b>100.0</b>	<b>100.0</b>	<b>75</b>	<b>100.0</b>	<b>100.0</b>	<b>9,303</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	78	71.6	84.5	2,470	17.9	28.7	57	76.0	88.2	1,598	17.2	31.2	
\$100,001 - \$250,000	12	11.0	8.6	1,672	12.1	19.7	8	10.7	7.0	1,183	12.7	21.4	
\$250,001 - \$1 Million	19	17.4	6.9	9,690	70.1	51.6	10	13.3	4.7	6,522	70.1	47.4	
<b>Total</b>	<b>109</b>	<b>100.0</b>	<b>100.0</b>	<b>13,832</b>	<b>100.0</b>	<b>100.0</b>	<b>75</b>	<b>100.0</b>	<b>100.0</b>	<b>9,303</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	51	87.9		1,658	37.3		20	87.0		638	28.4		
\$100,001 - \$250,000	1	1.7		143	3.2		1	4.3		125	5.6		
\$250,001 - \$1 Million	6	10.3		2,650	59.5		2	8.7		1,480	66.0		
<b>Total</b>	<b>58</b>	<b>100.0</b>		<b>4,451</b>	<b>100.0</b>		<b>23</b>	<b>100.0</b>		<b>2,243</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 48700 (Williamsport, PA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	1.3	0	0.0	0.9	1.4
Moderate	2	20.0	8.6	172	15.2	4.9	7.2
Middle	8	80.0	82.7	959	84.8	85.0	84.3
Upper	0	0.0	7.4	0	0.0	9.3	7.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,131</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.3	0	0.0	1.1	1.4
Moderate	1	4.0	5.3	39	1.0	2.7	7.2
Middle	19	76.0	84.7	1,710	44.8	82.8	84.3
Upper	5	20.0	8.7	2,065	54.1	13.4	7.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>3,814</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.0	0	0.0	1.6	1.4
Moderate	1	10.0	6.2	19	2.5	5.1	7.2
Middle	9	90.0	86.9	742	97.5	87.1	84.3
Upper	0	0.0	5.9	0	0.0	6.1	7.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>761</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	18.5	0	0.0	25.5	20.7
Moderate	0	0.0	18.5	0	0.0	9.8	19.8
Middle	0	0.0	55.6	0	0.0	62.3	46.1
Upper	0	0.0	7.4	0	0.0	2.3	13.4
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	1.5	0	0.0	1.6	1.4
Moderate	4	8.5	7.1	230	3.9	4.2	7.2
Middle	38	80.9	83.8	3,587	61.0	83.7	84.3
Upper	5	10.6	7.7	2,065	35.1	10.5	7.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>5,882</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 48700 (Williamsport, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
<b>Home Purchase Loans</b>													
Low	0	0.0	1.1	0	0.0	0.6	0	0.0	2.0	0	0.0	1.0	1.4
Moderate	0	0.0	9.5	0	0.0	5.7	4	26.7	11.8	468	13.5	7.0	7.2
Middle	2	66.7	81.4	117	51.1	82.5	9	60.0	79.7	1,477	42.7	83.8	84.3
Upper	1	33.3	8.0	112	48.9	11.1	2	13.3	6.4	1,514	43.8	8.2	7.0
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	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>229</b>	<b>100.0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>3,459</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.6	0	0.0	0.3	0	0.0	0.5	0	0.0	0.2	1.4
Moderate	2	14.3	4.0	111	6.2	2.1	3	11.1	4.4	243	7.6	2.6	7.2
Middle	11	78.6	85.2	1,448	80.7	84.2	21	77.8	86.6	2,541	79.6	84.9	84.3
Upper	1	7.1	10.2	235	13.1	13.4	3	11.1	8.5	408	12.8	12.3	7.0
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	
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>1,794</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>3,192</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.9	0	0.0	2.1	1	7.1	2.3	50	10.0	2.9	1.4
Moderate	0	0.0	6.0	0	0.0	5.3	2	14.3	6.6	45	9.0	3.8	7.2
Middle	7	100.0	82.6	781	100.0	83.6	10	71.4	84.2	354	70.9	85.3	84.3
Upper	0	0.0	9.4	0	0.0	9.0	1	7.1	6.9	50	10.0	8.0	7.0
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	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>781</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>499</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
Low	0	0.0	9.8	0	0.0	3.8	0	0.0	19.4	0	0.0	10.0	20.7
Moderate	0	0.0	29.3	0	0.0	9.3	0	0.0	37.1	0	0.0	37.3	19.8
Middle	0	0.0	53.7	0	0.0	75.4	0	0.0	33.9	0	0.0	16.4	46.1
Upper	0	0.0	7.3	0	0.0	11.5	1	100.0	9.7	6,001	100.0	36.2	13.4
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>6,001</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
Low	0	0.0	1.0	0	0.0	0.7	1	1.7	1.5	50	0.4	1.2	1.4
Moderate	2	6.7	6.6	111	3.1	4.0	9	15.0	8.0	756	5.6	6.6	7.2
Middle	25	83.3	83.4	3,032	84.4	83.3	42	70.0	82.9	4,575	33.9	80.3	84.3
Upper	3	10.0	9.0	450	12.5	12.0	8	13.3	7.5	8,103	60.1	11.9	7.0
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	
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>3,593</b>	<b>100.0</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>	<b>13,484</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 48700 (Williamsport, PA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	2	5.4	4.3	360	5.7	5.2	5.1
Moderate	7	18.9	15.5	2,315	36.9	18.6	16.4
Middle	19	51.4	71.0	1,032	16.4	65.6	71.9
Upper	9	24.3	8.2	2,567	40.9	10.1	6.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.5	
<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>6,274</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 48700 (Williamsport, PA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	5	4.4	3.7	1,032	7.5	7.8	4	4.7	3.6	1,419	10.7	8.1	4.7
Moderate	32	28.1	14.6	3,122	22.6	17.8	19	22.1	13.7	4,634	35.0	18.2	16.3
Middle	70	61.4	76.0	8,135	58.8	68.9	56	65.1	74.5	4,088	30.9	62.8	72.5
Upper	7	6.1	5.6	1,554	11.2	5.5	7	8.1	7.9	3,107	23.5	10.9	6.5
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	0.1	0	0.0	0.0	0	0.0	0.2	0	0.0	0.0	
<b>Total</b>	<b>114</b>	<b>100.0</b>	<b>100.0</b>	<b>13,843</b>	<b>100.0</b>	<b>100.0</b>	<b>86</b>	<b>100.0</b>	<b>100.0</b>	<b>13,248</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 48700 (Williamsport, PA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	10.0	5.7	122	10.8	3.2	20.0
<b>Moderate</b>	3	30.0	19.8	324	28.6	14.9	18.7
<b>Middle</b>	1	10.0	24.9	129	11.4	23.1	22.0
<b>Upper</b>	4	40.0	38.1	411	36.3	49.4	39.2
<b>Unknown</b>	1	10.0	11.6	145	12.8	9.4	0.0
<b>Total</b>	10	100.0	100.0	1,131	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	7.3	0	0.0	4.1	20.0
<b>Moderate</b>	7	28.0	15.8	546	14.3	11.5	18.7
<b>Middle</b>	7	28.0	21.7	678	17.8	18.0	22.0
<b>Upper</b>	11	44.0	40.8	2,590	67.9	47.4	39.2
<b>Unknown</b>	0	0.0	14.4	0	0.0	19.0	0.0
<b>Total</b>	25	100.0	100.0	3,814	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	1	10.0	7.3	40	5.3	4.8	20.0
<b>Moderate</b>	2	20.0	13.5	223	29.3	9.9	18.7
<b>Middle</b>	2	20.0	21.5	214	28.1	18.5	22.0
<b>Upper</b>	4	40.0	49.8	234	30.7	58.6	39.2
<b>Unknown</b>	1	10.0	8.0	50	6.6	8.3	0.0
<b>Total</b>	10	100.0	100.0	761	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	2	4.3	6.3	162	2.8	3.6	20.0
<b>Moderate</b>	12	25.5	17.4	1,093	18.6	13.2	18.7
<b>Middle</b>	10	21.3	22.8	1,021	17.4	20.4	22.0
<b>Upper</b>	19	40.4	40.4	3,235	55.0	48.7	39.2
<b>Unknown</b>	4	8.5	13.2	371	6.3	14.1	0.0
<b>Total</b>	47	100.0	100.0	5,882	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 48700 (Williamsport, PA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	5.0	0	0.0	2.6	4	26.7	8.7	339	9.8	5.0	20.0
Moderate	1	33.3	21.0	112	48.9	15.4	4	26.7	23.6	624	18.0	18.2	18.7
Middle	1	33.3	28.0	50	21.8	24.9	2	13.3	24.3	385	11.1	23.2	22.0
Upper	0	0.0	36.8	0	0.0	48.4	2	13.3	27.3	438	12.7	37.3	39.2
Unknown	1	33.3	9.3	67	29.3	8.7	3	20.0	16.2	1,673	48.4	16.3	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>229</b>	<b>100.0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>3,459</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	14.3	4.0	152	8.5	2.0	5	18.5	7.2	325	10.2	4.2	20.0
Moderate	2	14.3	13.0	234	13.0	8.3	7	25.9	16.7	955	29.9	12.4	18.7
Middle	2	14.3	20.3	130	7.2	16.6	6	22.2	23.6	776	24.3	20.5	22.0
Upper	8	57.1	46.5	1,278	71.2	54.1	9	33.3	36.4	1,136	35.6	44.3	39.2
Unknown	0	0.0	16.2	0	0.0	19.0	0	0.0	16.1	0	0.0	18.5	0.0
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>1,794</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>3,192</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	28.6	6.0	120	15.4	4.4	5	35.7	10.4	152	30.5	7.7	20.0
Moderate	1	14.3	15.5	105	13.4	11.2	3	21.4	16.2	95	19.0	14.3	18.7
Middle	2	28.6	21.9	156	20.0	18.9	2	14.3	23.6	36	7.2	18.7	22.0
Upper	2	28.6	52.5	400	51.2	60.5	2	14.3	44.4	70	14.0	51.4	39.2
Unknown	0	0.0	4.2	0	0.0	5.1	2	14.3	5.4	146	29.3	7.9	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>781</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>499</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	4	13.3	4.7	272	7.6	2.4	14	23.7	8.0	816	10.9	4.7	20.0
Moderate	4	13.3	15.8	451	12.6	11.1	14	23.7	19.2	1,674	22.4	15.0	18.7
Middle	5	16.7	22.8	336	9.4	19.6	10	16.9	24.0	1,197	16.0	21.8	22.0
Upper	10	33.3	42.3	1,678	46.7	51.1	13	22.0	33.1	1,644	22.0	41.0	39.2
Unknown	7	23.3	14.4	856	23.8	15.8	8	13.6	15.7	2,152	28.8	17.5	0.0
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>3,593</b>	<b>100.0</b>	<b>100.0</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>7,483</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 48700 (Williamsport, PA)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	24	64.9	39.3	1,934	30.8	35.8	89.9
Over \$1 Million	13	35.1		4,340	69.2		8.1
Revenue Unknown	0	0.0		0	0.0		2.0
<b>Total</b>	<b>37</b>	<b>100.0</b>		<b>6,274</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	25	67.6	92.8	766	12.2	38.6	
\$100,001 - \$250,000	4	10.8	4.1	860	13.7	18.8	
\$250,001 - \$1 Million	8	21.6	3.1	4,648	74.1	42.7	
<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>6,274</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	20	83.3		536	27.7		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	4	16.7		1,398	72.3		
<b>Total</b>	<b>24</b>	<b>100.0</b>		<b>1,934</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 48700 (Williamsport, PA)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
<b>By Revenue</b>													
\$1 Million or Less	48	42.1	37.8	3,360	24.3	22.9	25	29.1	46.7	798	6.0	32.7	90.0
Over \$1 Million	36	31.6		8,005	57.8		34	39.5		11,478	86.6		7.8
Revenue Unknown	30	26.3		2,478	17.9		27	31.4		972	7.3		2.2
<b>Total</b>	<b>114</b>	<b>100.0</b>		<b>13,843</b>	<b>100.0</b>		<b>86</b>	<b>100.0</b>		<b>13,248</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	74	64.9	86.5	2,740	19.8	30.4	54	62.8	89.3	1,316	9.9	29.2	
\$100,001 - \$250,000	20	17.5	7.7	2,798	20.2	20.9	15	17.4	6.4	2,408	18.2	22.0	
\$250,001 - \$1 Million	20	17.5	5.8	8,305	60.0	48.7	17	19.8	4.3	9,524	71.9	48.7	
<b>Total</b>	<b>114</b>	<b>100.0</b>	<b>100.0</b>	<b>13,843</b>	<b>100.0</b>	<b>100.0</b>	<b>86</b>	<b>100.0</b>	<b>100.0</b>	<b>13,248</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	42	87.5		1,256	37.4		24	96.0		493	61.8		
\$100,001 - \$250,000	3	6.3		514	15.3		0	0.0		0	0.0		
\$250,001 - \$1 Million	3	6.3		1,590	47.3		1	4.0		305	38.2		
<b>Total</b>	<b>48</b>	<b>100.0</b>		<b>3,360</b>	<b>100.0</b>		<b>25</b>	<b>100.0</b>		<b>798</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA Pennsylvania (Group A)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	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
Middle	4	66.7	85.2	500	58.0	84.1	84.7
Upper	2	33.3	14.8	362	42.0	15.9	15.3
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	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>862</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	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
Middle	17	81.0	85.6	1,550	77.9	81.8	84.7
Upper	4	19.0	14.4	441	22.1	18.2	15.3
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	
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>1,991</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	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
Middle	7	87.5	83.3	256	83.7	86.4	84.7
Upper	1	12.5	16.7	50	16.3	13.6	15.3
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	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>306</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	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
Middle	0	0.0	100.0	0	0.0	100.0	94.9
Upper	0	0.0	0.0	0	0.0	0.0	5.1
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	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
Middle	31	79.5	85.4	2,501	72.8	83.9	84.7
Upper	8	20.5	14.6	934	27.2	16.1	15.3
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	
<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>3,435</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA Pennsylvania (Group A)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
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	0.0
Middle	13	81.3	86.2	1,787	86.0	84.7	18	81.8	89.1	2,184	78.5	87.6	84.7
Upper	3	18.8	13.8	292	14.0	15.3	4	18.2	10.9	597	21.5	12.4	15.3
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	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>2,079</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,781</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
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	0.0
Middle	12	75.0	84.4	1,163	72.8	82.7	29	85.3	84.2	3,339	85.5	83.0	84.7
Upper	4	25.0	15.6	434	27.2	17.3	5	14.7	15.8	565	14.5	17.0	15.3
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	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>1,597</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>3,904</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	0.0
Middle	6	100.0	84.6	385	100.0	82.5	7	87.5	87.6	382	94.8	92.4	84.7
Upper	0	0.0	15.4	0	0.0	17.5	1	12.5	12.4	21	5.2	7.6	15.3
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	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>385</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>403</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	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	0.0
Middle	0	0.0	87.5	0	0.0	97.4	0	0.0	100.0	0	0.0	100.0	94.9
Upper	0	0.0	12.5	0	0.0	2.6	0	0.0	0.0	0	0.0	0.0	5.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	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	0.0
Middle	33	82.5	85.3	3,549	83.0	84.0	56	84.8	86.8	6,099	83.8	85.9	84.7
Upper	7	17.5	14.7	726	17.0	16.0	10	15.2	13.2	1,183	16.2	14.1	15.3
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	0.0
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>4,275</b>	<b>100.0</b>	<b>100.0</b>	<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>7,282</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA Pennsylvania (Group A)							
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	0.0	0	0.0	0.0	0.0
Middle	29	85.3	81.6	1,725	95.8	82.7	85.7
Upper	5	14.7	17.2	75	4.2	16.8	14.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	0.5	
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>1,800</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Non-MSA Pennsylvania (Group A)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
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	0.0
Middle	42	80.8	88.2	1,705	66.5	87.1	37	75.5	85.2	1,460	86.8	82.5	85.6
Upper	10	19.2	11.6	859	33.5	12.7	12	24.5	14.1	222	13.2	17.2	14.4
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	0.2	0	0.0	0.1	0	0.0	0.7	0	0.0	0.2	
<b>Total</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>2,564</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>1,682</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Non-MSA Pennsylvania (Group A)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	5.3	0	0.0	3.0	17.9
<b>Moderate</b>	0	0.0	18.5	0	0.0	14.3	18.4
<b>Middle</b>	3	50.0	25.7	379	44.0	24.0	20.6
<b>Upper</b>	3	50.0	36.8	483	56.0	45.1	43.1
<b>Unknown</b>	0	0.0	13.6	0	0.0	13.6	0.0
<b>Total</b>	6	100.0	100.0	862	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	5	23.8	10.0	294	14.8	5.2	17.9
<b>Moderate</b>	5	23.8	16.4	521	26.2	12.3	18.4
<b>Middle</b>	4	19.0	23.1	618	31.0	20.9	20.6
<b>Upper</b>	7	33.3	38.4	558	28.0	46.1	43.1
<b>Unknown</b>	0	0.0	12.1	0	0.0	15.5	0.0
<b>Total</b>	21	100.0	100.0	1,991	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	9.8	0	0.0	5.2	17.9
<b>Moderate</b>	2	25.0	19.6	75	24.5	16.5	18.4
<b>Middle</b>	1	12.5	22.5	15	4.9	16.3	20.6
<b>Upper</b>	5	62.5	44.1	216	70.6	59.6	43.1
<b>Unknown</b>	0	0.0	3.9	0	0.0	2.4	0.0
<b>Total</b>	8	100.0	100.0	306	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	5	12.8	7.2	294	8.6	3.7	17.9
<b>Moderate</b>	7	17.9	17.4	596	17.4	13.6	18.4
<b>Middle</b>	8	20.5	24.3	1,012	29.5	22.5	20.6
<b>Upper</b>	15	38.5	37.8	1,257	36.6	45.4	43.1
<b>Unknown</b>	4	10.3	13.2	276	8.0	14.8	0.0
<b>Total</b>	39	100.0	100.0	3,435	100.0	100.0	100.0



Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA Pennsylvania (Group A)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	18.8	5.6	305	14.7	3.4	4	18.2	6.0	334	12.0	3.3	17.9
Moderate	2	12.5	19.2	163	7.8	14.4	5	22.7	19.9	628	22.6	13.8	18.4
Middle	5	31.3	23.7	513	24.7	22.2	6	27.3	21.9	799	28.7	20.5	20.6
Upper	5	31.3	35.6	905	43.5	44.3	7	31.8	34.8	1,020	36.7	45.7	43.1
Unknown	1	6.3	15.9	193	9.3	15.6	0	0.0	17.4	0	0.0	16.6	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>2,079</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,781</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	4.3	0	0.0	2.2	4	11.8	4.3	312	8.0	2.2	17.9
Moderate	6	37.5	13.5	477	29.9	9.8	8	23.5	14.9	746	19.1	9.6	18.4
Middle	3	18.8	21.3	291	18.2	17.9	9	26.5	20.5	782	20.0	17.1	20.6
Upper	6	37.5	43.8	664	41.6	50.4	13	38.2	42.2	2,064	52.9	51.2	43.1
Unknown	1	6.3	17.1	165	10.3	19.6	0	0.0	18.1	0	0.0	19.8	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>1,597</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>3,904</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.9	0	0.0	2.7	2	25.0	3.1	100	24.8	3.1	17.9
Moderate	0	0.0	17.3	0	0.0	16.1	2	25.0	19.6	150	37.2	13.4	18.4
Middle	5	83.3	25.0	235	61.0	19.7	1	12.5	22.7	21	5.2	14.8	20.6
Upper	1	16.7	52.9	150	39.0	59.5	3	37.5	50.5	132	32.8	64.9	43.1
Unknown	0	0.0	1.9	0	0.0	1.9	0	0.0	4.1	0	0.0	3.8	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>385</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>403</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	3	7.5	5.0	305	7.1	2.8	10	15.2	5.0	746	10.2	2.8	17.9
Moderate	8	20.0	16.1	640	15.0	12.0	15	22.7	17.1	1,524	20.9	11.7	18.4
Middle	13	32.5	22.3	1,039	24.3	19.7	16	24.2	21.3	1,602	22.0	18.8	20.6
Upper	12	30.0	39.4	1,719	40.2	46.9	23	34.8	39.4	3,216	44.2	48.6	43.1
Unknown	4	10.0	17.3	572	13.4	18.5	2	3.0	17.2	194	2.7	18.1	0.0
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>4,275</b>	<b>100.0</b>	<b>100.0</b>	<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>7,282</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA Pennsylvania (Group A)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	28	82.4	45.0	1,225	68.1	34.8	88.8
Over \$1 Million	6	17.6		575	31.9		7.3
Revenue Unknown	0	0.0		0	0.0		3.9
<b>Total</b>	<b>34</b>	<b>100.0</b>		<b>1,800</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	29	85.3	91.3	619	34.4	38.6	
\$100,001 - \$250,000	4	11.8	5.8	831	46.2	24.8	
\$250,001 - \$1 Million	1	2.9	2.9	350	19.4	36.6	
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>1,800</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	25	89.3		514	42.0		
\$100,001 - \$250,000	2	7.1		361	29.5		
\$250,001 - \$1 Million	1	3.6		350	28.6		
<b>Total</b>	<b>28</b>	<b>100.0</b>		<b>1,225</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA Pennsylvania (Group A)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	33	63.5	38.6	813	31.7	22.2	27	55.1	53.3	750	44.6	31.1	88.6
Over \$1 Million	7	13.5		1,122	43.8		1	2.0		330	19.6		7.0
Revenue Unknown	12	23.1		629	24.5		21	42.9		602	35.8		4.4
<b>Total</b>	<b>52</b>	<b>100.0</b>		<b>2,564</b>	<b>100.0</b>		<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>1,682</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	46	88.5	84.7	1,163	45.4	27.7	45	91.8	88.9	990	58.9	35.3	
\$100,001 - \$250,000	3	5.8	8.8	384	15.0	20.8	3	6.1	7.2	362	21.5	23.4	
\$250,001 - \$1 Million	3	5.8	6.4	1,017	39.7	51.5	1	2.0	3.9	330	19.6	41.3	
<b>Total</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>2,564</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>1,682</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	32	97.0		710	87.3		26	96.3		621	82.8		
\$100,001 - \$250,000	1	3.0		103	12.7		1	3.7		129	17.2		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
<b>Total</b>	<b>33</b>	<b>100.0</b>		<b>813</b>	<b>100.0</b>		<b>27</b>	<b>100.0</b>		<b>750</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA Pennsylvania (Group B)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	17.4	8.9	359	6.6	5.8	10.5
Middle	29	63.0	66.0	3,809	69.9	61.7	72.1
Upper	9	19.6	25.1	1,283	23.5	32.4	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>5,451</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	3.5	5.5	134	1.2	3.4	10.5
Middle	77	67.5	71.7	7,641	66.8	68.4	72.1
Upper	33	28.9	22.9	3,656	32.0	28.2	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>114</b>	<b>100.0</b>	<b>100.0</b>	<b>11,431</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	4.5	6.5	84	2.8	6.4	10.5
Middle	41	61.2	72.2	1,773	58.5	67.2	72.1
Upper	23	34.3	21.3	1,173	38.7	26.4	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>67</b>	<b>100.0</b>	<b>100.0</b>	<b>3,030</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.2	0	0.0	6.2	31.4
Middle	1	100.0	75.7	188	100.0	89.4	59.9
Upper	0	0.0	8.1	0	0.0	4.5	8.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>188</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	15	6.3	7.6	577	2.7	5.1	10.5
Middle	153	64.3	68.8	14,006	66.6	64.8	72.1
Upper	70	29.4	23.5	6,436	30.6	30.1	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>238</b>	<b>100.0</b>	<b>100.0</b>	<b>21,019</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA Pennsylvania (Group B)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	12.1	9.0	472	7.1	6.0	9	12.2	9.9	619	6.2	6.4	10.5
Middle	42	72.4	67.0	4,656	69.7	63.9	49	66.2	68.8	6,676	67.2	64.9	72.1
Upper	9	15.5	24.0	1,555	23.3	30.2	16	21.6	21.2	2,634	26.5	28.7	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>6,683</b>	<b>100.0</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>9,929</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	2.9	3.5	250	1.8	2.7	12	6.6	4.8	723	3.7	3.4	10.5
Middle	90	65.2	67.8	8,151	59.7	63.7	126	69.2	67.2	12,930	66.8	63.8	72.1
Upper	44	31.9	28.6	5,244	38.4	33.5	44	24.2	27.9	5,692	29.4	32.8	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>138</b>	<b>100.0</b>	<b>100.0</b>	<b>13,645</b>	<b>100.0</b>	<b>100.0</b>	<b>182</b>	<b>100.0</b>	<b>100.0</b>	<b>19,345</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	10.3	4.9	327	9.7	3.6	5	8.6	7.9	223	6.4	8.9	10.5
Middle	34	58.6	71.0	1,812	53.7	66.6	41	70.7	69.3	2,514	71.8	62.2	72.1
Upper	18	31.0	24.2	1,235	36.6	29.9	12	20.7	22.9	763	21.8	28.9	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>3,374</b>	<b>100.0</b>	<b>100.0</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>3,500</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	20.6	0	0.0	26.4	0	0.0	22.7	0	0.0	21.1	31.4
Middle	1	100.0	61.8	132	100.0	67.0	0	0.0	63.6	0	0.0	59.5	59.9
Upper	0	0.0	17.6	0	0.0	6.6	0	0.0	13.6	0	0.0	19.4	8.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>132</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	19	7.0	6.4	1,179	4.7	4.7	29	9.0	7.4	1,697	5.1	5.1	10.5
Middle	178	65.7	67.7	15,761	62.6	63.8	220	68.1	68.3	22,456	67.1	64.3	72.1
Upper	74	27.3	26.0	8,245	32.7	31.5	74	22.9	24.3	9,315	27.8	30.5	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>271</b>	<b>100.0</b>	<b>100.0</b>	<b>25,185</b>	<b>100.0</b>	<b>100.0</b>	<b>323</b>	<b>100.0</b>	<b>100.0</b>	<b>33,468</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA Pennsylvania (Group B)							
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	31	14.6	10.4	969	6.0	7.5	13.4
Middle	130	61.3	67.2	9,463	59.0	69.1	68.5
Upper	51	24.1	20.7	5,618	35.0	22.8	18.0
Unknown	0	0.0	0.1	0	0.0	0.0	0.2
Tract-Unk	0	0.0	1.7	0	0.0	0.6	
<b>Total</b>	<b>212</b>	<b>100.0</b>	<b>100.0</b>	<b>16,050</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Non-MSA Pennsylvania (Group B)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	81	16.5	11.2	4,797	11.3	10.3	63	18.8	11.5	3,544	13.8	7.8	12.9
Middle	287	58.6	67.5	25,170	59.5	66.1	189	56.4	65.4	12,826	50.1	65.5	68.9
Upper	122	24.9	20.9	12,352	29.2	23.4	83	24.8	22.2	9,245	36.1	26.0	17.9
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.3	0	0.0	0.2	0	0.0	0.8	0	0.0	0.7	
<b>Total</b>	<b>490</b>	<b>100.0</b>	<b>100.0</b>	<b>42,319</b>	<b>100.0</b>	<b>100.0</b>	<b>335</b>	<b>100.0</b>	<b>100.0</b>	<b>25,615</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Non-MSA Pennsylvania (Group B)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	6	13.0	7.9	321	5.9	4.0	18.6
<b>Moderate</b>	10	21.7	23.6	699	12.8	16.7	18.9
<b>Middle</b>	10	21.7	22.5	1,236	22.7	21.8	21.1
<b>Upper</b>	17	37.0	31.8	3,005	55.1	44.6	41.4
<b>Unknown</b>	3	6.5	14.1	190	3.5	12.9	0.0
<b>Total</b>	46	100.0	100.0	5,451	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	8	7.0	8.2	402	3.5	4.0	18.6
<b>Moderate</b>	16	14.0	17.1	1,035	9.1	12.4	18.9
<b>Middle</b>	28	24.6	21.8	2,170	19.0	18.2	21.1
<b>Upper</b>	56	49.1	39.6	5,976	52.3	47.8	41.4
<b>Unknown</b>	6	5.3	13.3	1,848	16.2	17.6	0.0
<b>Total</b>	114	100.0	100.0	11,431	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	3	4.5	5.1	75	2.5	4.1	18.6
<b>Moderate</b>	13	19.4	16.2	609	20.1	14.5	18.9
<b>Middle</b>	20	29.9	26.2	748	24.7	18.2	21.1
<b>Upper</b>	31	46.3	50.9	1,598	52.7	61.0	41.4
<b>Unknown</b>	0	0.0	1.6	0	0.0	2.3	0.0
<b>Total</b>	67	100.0	100.0	3,030	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	17	7.2	7.6	798	3.8	4.0	18.6
<b>Moderate</b>	39	16.5	20.0	2,343	11.2	14.9	18.9
<b>Middle</b>	58	24.5	21.7	4,154	19.9	19.9	21.1
<b>Upper</b>	104	43.9	36.3	10,579	50.8	45.7	41.4
<b>Unknown</b>	19	8.0	14.5	2,957	14.2	15.6	0.0
<b>Total</b>	237	100.0	100.0	20,831	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA Pennsylvania (Group B)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	5.2	8.8	157	2.3	4.7	8	10.8	7.6	586	5.9	4.0	18.6
Moderate	16	27.6	23.9	1,288	19.3	17.4	23	31.1	23.3	2,092	21.1	16.2	18.9
Middle	23	39.7	23.7	3,066	45.9	21.8	17	23.0	23.1	2,471	24.9	22.4	21.1
Upper	10	17.2	31.7	1,527	22.8	45.3	21	28.4	29.8	4,240	42.7	42.1	41.4
Unknown	6	10.3	11.9	645	9.7	10.8	5	6.8	16.2	540	5.4	15.4	0.0
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>6,683</b>	<b>100.0</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>9,929</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	18	13.0	4.7	932	6.8	2.1	14	7.7	4.7	884	4.6	2.3	18.6
Moderate	27	19.6	11.9	2,271	16.6	7.7	37	20.3	13.8	3,126	16.2	9.6	18.9
Middle	39	28.3	20.4	3,526	25.8	16.9	49	26.9	22.8	4,473	23.1	19.3	21.1
Upper	50	36.2	45.7	6,129	44.9	53.9	76	41.8	42.2	10,171	52.6	50.2	41.4
Unknown	4	2.9	17.3	787	5.8	19.4	6	3.3	16.5	691	3.6	18.7	0.0
<b>Total</b>	<b>138</b>	<b>100.0</b>	<b>100.0</b>	<b>13,645</b>	<b>100.0</b>	<b>100.0</b>	<b>182</b>	<b>100.0</b>	<b>100.0</b>	<b>19,345</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	6	10.3	5.4	243	7.2	3.8	8	13.8	7.1	372	10.6	5.6	18.6
Moderate	9	15.5	14.4	344	10.2	11.0	9	15.5	15.7	526	15.0	12.7	18.9
Middle	17	29.3	22.4	1,242	36.8	20.7	16	27.6	24.0	994	28.4	20.2	21.1
Upper	25	43.1	54.0	1,465	43.4	60.2	25	43.1	51.0	1,608	45.9	58.6	41.4
Unknown	1	1.7	3.9	80	2.4	4.3	0	0.0	2.1	0	0.0	2.9	0.0
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>3,374</b>	<b>100.0</b>	<b>100.0</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>3,500</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	27	10.0	6.6	1,332	5.3	3.3	30	9.3	6.1	1,842	5.5	3.2	18.6
Moderate	52	19.3	16.9	3,903	15.6	12.0	69	21.4	17.9	5,744	17.2	12.7	18.9
Middle	79	29.3	21.3	7,834	31.3	18.8	82	25.4	22.7	7,938	23.7	20.6	21.1
Upper	85	31.5	39.1	9,121	36.4	49.4	122	37.8	37.2	16,019	47.9	46.4	41.4
Unknown	27	10.0	16.1	2,863	11.4	16.5	20	6.2	16.1	1,925	5.8	17.1	0.0
<b>Total</b>	<b>270</b>	<b>100.0</b>	<b>100.0</b>	<b>25,053</b>	<b>100.0</b>	<b>100.0</b>	<b>323</b>	<b>100.0</b>	<b>100.0</b>	<b>33,468</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA Pennsylvania (Group B)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	160	75.5	43.0	7,505	46.8	36.3	89.4
<b>Over \$1 Million</b>	44	20.8		8,023	50.0		7.8
<b>Revenue Unknown</b>	8	3.8		522	3.3		2.8
<b>Total</b>	212	100.0		16,050	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	183	86.3	94.6	4,456	27.8	43.9	
<b>\$100,001 - \$250,000</b>	11	5.2	3.0	1,830	11.4	16.5	
<b>\$250,001 - \$1 Million</b>	18	8.5	2.3	9,764	60.8	39.5	
<b>Total</b>	212	100.0	100.0	16,050	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	146	91.3		3,256	43.4		
<b>\$100,001 - \$250,000</b>	7	4.4		1,064	14.2		
<b>\$250,001 - \$1 Million</b>	7	4.4		3,185	42.4		
<b>Total</b>	160	100.0		7,505	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA Pennsylvania (Group B)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%		%
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	202	41.2	35.4	8,955	21.2	24.4	146	43.6	49.9	5,871	22.9	29.7	89.4
<b>Over \$1 Million</b>	121	24.7		25,886	61.2		53	15.8		13,654	53.3		7.6
<b>Revenue Unknown</b>	167	34.1		7,478	17.7		136	40.6		6,090	23.8		3.0
<b>Total</b>	490	100.0		42,319	100.0		335	100.0		25,615	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	388	79.2	88.4	11,456	27.1	32.5	286	85.4	92.3	8,194	32.0	37.6	
<b>\$100,001 - \$250,000</b>	63	12.9	7.0	9,792	23.1	21.3	27	8.1	4.5	4,112	16.1	19.4	
<b>\$250,001 - \$1 Million</b>	39	8.0	4.6	21,071	49.8	46.2	22	6.6	3.2	13,309	52.0	43.1	
<b>Total</b>	490	100.0	100.0	42,319	100.0	100.0	335	100.0	100.0	25,615	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	189	93.6		4,853	54.2		140	95.9		3,953	67.3		
<b>\$100,001 - \$250,000</b>	8	4.0		1,283	14.3		2	1.4		264	4.5		
<b>\$250,001 - \$1 Million</b>	5	2.5		2,819	31.5		4	2.7		1,654	28.2		
<b>Total</b>	202	100.0		8,955	100.0		146	100.0		5,871	100.0		



Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA Pennsylvania (Group C)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	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
Middle	7	100.0	91.0	793	100.0	86.0	93.0
Upper	0	0.0	9.0	0	0.0	14.0	7.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>793</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	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
Middle	19	95.0	93.2	1,308	92.9	90.1	93.0
Upper	1	5.0	6.8	100	7.1	9.9	7.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>1,408</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	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
Middle	5	100.0	84.6	165	100.0	81.0	93.0
Upper	0	0.0	15.4	0	0.0	19.0	7.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>165</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	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
Middle	0	0.0	90.0	0	0.0	92.4	98.3
Upper	0	0.0	10.0	0	0.0	7.6	1.7
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	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
Middle	31	96.9	91.5	2,266	95.8	88.1	93.0
Upper	1	3.1	8.5	100	4.2	11.9	7.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>2,366</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA Pennsylvania (Group C)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
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	0.0
Middle	8	72.7	91.9	958	54.8	89.1	10	90.9	94.9	1,570	84.0	93.4	93.0
Upper	3	27.3	8.1	790	45.2	10.9	1	9.1	5.1	299	16.0	6.6	7.0
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	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,748</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,869</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
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	0.0
Middle	27	90.0	89.0	2,670	88.2	85.5	23	95.8	91.4	1,979	75.0	88.8	93.0
Upper	3	10.0	11.0	357	11.8	14.5	1	4.2	8.6	658	25.0	11.2	7.0
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	
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>3,027</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>2,637</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	0.0
Middle	7	87.5	95.5	334	77.0	95.9	4	100.0	88.1	100	100.0	88.6	93.0
Upper	1	12.5	4.5	100	23.0	4.1	0	0.0	11.9	0	0.0	11.4	7.0
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	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>434</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
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	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	75.0	0	0.0	6.9	98.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	25.0	0	0.0	93.1	1.7
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
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	0.0
Middle	43	86.0	90.9	3,985	76.2	87.8	37	94.9	92.4	3,649	79.2	86.6	93.0
Upper	7	14.0	9.1	1,247	23.8	12.2	2	5.1	7.6	957	20.8	13.4	7.0
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	
<b>Total</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>5,232</b>	<b>100.0</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>4,606</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA Pennsylvania (Group C)							
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	0.0	0	0.0	0.0	0.0
Middle	42	93.3	91.3	2,976	97.2	93.8	93.9
Upper	3	6.7	7.1	86	2.8	5.6	6.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.6	0	0.0	0.6	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>3,062</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Non-MSA Pennsylvania (Group C)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
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	0.0
Middle	67	94.4	90.4	3,875	86.0	92.1	60	98.4	91.1	1,812	98.9	93.2	93.4
Upper	4	5.6	9.3	632	14.0	7.7	1	1.6	8.6	21	1.1	6.7	6.6
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	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>4,507</b>	<b>100.0</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>1,833</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Non-MSA Pennsylvania (Group C)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	14.3	7.6	80	10.1	4.1	19.5
<b>Moderate</b>	1	14.3	23.5	134	16.9	18.2	17.6
<b>Middle</b>	2	28.6	25.0	203	25.6	23.2	24.1
<b>Upper</b>	3	42.9	29.2	376	47.4	40.2	38.7
<b>Unknown</b>	0	0.0	14.7	0	0.0	14.2	0.0
<b>Total</b>	7	100.0	100.0	793	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	3	15.0	8.5	130	9.2	3.9	19.5
<b>Moderate</b>	3	15.0	17.0	174	12.4	10.8	17.6
<b>Middle</b>	5	25.0	26.9	354	25.1	22.7	24.1
<b>Upper</b>	8	40.0	38.0	650	46.2	48.7	38.7
<b>Unknown</b>	1	5.0	9.6	100	7.1	13.9	0.0
<b>Total</b>	20	100.0	100.0	1,408	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	8.5	0	0.0	5.0	19.5
<b>Moderate</b>	1	20.0	14.6	50	30.3	12.4	17.6
<b>Middle</b>	1	20.0	27.7	25	15.2	23.9	24.1
<b>Upper</b>	3	60.0	49.2	90	54.5	58.7	38.7
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	5	100.0	100.0	165	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	4	12.5	7.7	210	8.9	4.0	19.5
<b>Moderate</b>	5	15.6	19.3	358	15.1	14.5	17.6
<b>Middle</b>	8	25.0	25.9	582	24.6	22.8	24.1
<b>Upper</b>	14	43.8	36.2	1,116	47.2	45.0	38.7
<b>Unknown</b>	1	3.1	10.9	100	4.2	13.8	0.0
<b>Total</b>	32	100.0	100.0	2,366	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA Pennsylvania (Group C)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	27.3	12.0	345	19.7	7.3	1	9.1	8.0	51	2.7	4.3	19.5
Moderate	4	36.4	21.6	422	24.1	16.0	3	27.3	24.1	364	19.5	19.1	17.6
Middle	1	9.1	21.7	146	8.4	22.2	1	9.1	19.2	181	9.7	18.1	24.1
Upper	2	18.2	30.2	540	30.9	39.8	6	54.5	28.9	1,273	68.1	39.2	38.7
Unknown	1	9.1	14.5	295	16.9	14.6	0	0.0	19.7	0	0.0	19.2	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,748</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,869</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	6.7	5.8	120	4.0	2.7	7	29.2	6.9	435	16.5	3.6	19.5
Moderate	7	23.3	14.6	546	18.0	9.8	6	25.0	16.0	605	22.9	12.0	17.6
Middle	8	26.7	24.0	1,047	34.6	20.7	3	12.5	24.3	219	8.3	20.3	24.1
Upper	13	43.3	43.1	1,314	43.4	49.6	8	33.3	38.0	1,378	52.3	44.3	38.7
Unknown	0	0.0	12.4	0	0.0	17.3	0	0.0	14.8	0	0.0	19.8	0.0
<b>Total</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>3,027</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>2,637</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	6.0	0	0.0	3.6	0	0.0	5.9	0	0.0	2.1	19.5
Moderate	0	0.0	17.2	0	0.0	14.4	2	50.0	25.2	60	60.0	15.7	17.6
Middle	3	37.5	33.6	97	22.4	32.5	0	0.0	23.0	0	0.0	22.9	24.1
Upper	4	50.0	40.3	310	71.4	47.0	2	50.0	43.7	40	40.0	54.1	38.7
Unknown	1	12.5	3.0	27	6.2	2.5	0	0.0	2.2	0	0.0	5.3	0.0
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>434</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	5	10.0	8.5	465	8.9	4.6	8	20.5	7.1	486	10.6	3.8	19.5
Moderate	11	22.0	16.9	968	18.5	12.0	11	28.2	19.2	1,029	22.3	14.7	17.6
Middle	12	24.0	23.6	1,290	24.7	21.4	4	10.3	22.9	400	8.7	19.6	24.1
Upper	19	38.0	37.6	2,164	41.4	44.9	16	41.0	35.3	2,691	58.4	42.7	38.7
Unknown	3	6.0	13.5	345	6.6	17.1	0	0.0	15.5	0	0.0	19.2	0.0
<b>Total</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>5,232</b>	<b>100.0</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>4,606</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA Pennsylvania (Group C)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	38	84.4	56.7	2,249	73.4	47.1	91.1
Over \$1 Million	7	15.6		813	26.6		6.4
Revenue Unknown	0	0.0		0	0.0		2.5
<b>Total</b>	<b>45</b>	<b>100.0</b>		<b>3,062</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	35	77.8	93.3	802	26.2	40.9	
\$100,001 - \$250,000	8	17.8	3.7	1,610	52.6	17.7	
\$250,001 - \$1 Million	2	4.4	3.1	650	21.2	41.4	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>3,062</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	32	84.2		707	31.4		
\$100,001 - \$250,000	4	10.5		892	39.7		
\$250,001 - \$1 Million	2	5.3		650	28.9		
<b>Total</b>	<b>38</b>	<b>100.0</b>		<b>2,249</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA Pennsylvania (Group C)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
<b>By Revenue</b>													
\$1 Million or Less	33	46.5	44.6	2,132	47.3	29.5	32	52.5	52.0	613	33.4	41.6	91.2
Over \$1 Million	10	14.1		926	20.5		6	9.8		452	24.7		6.0
Revenue Unknown	28	39.4		1,449	32.1		23	37.7		768	41.9		2.8
<b>Total</b>	<b>71</b>	<b>100.0</b>		<b>4,507</b>	<b>100.0</b>		<b>61</b>	<b>100.0</b>		<b>1,833</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	61	85.9	89.1	2,097	46.5	40.6	58	95.1	92.8	1,396	76.2	45.2	
\$100,001 - \$250,000	7	9.9	7.6	1,284	28.5	26.7	3	4.9	4.6	437	23.8	20.1	
\$250,001 - \$1 Million	3	4.2	3.4	1,126	25.0	32.7	0	0.0	2.6	0	0.0	34.7	
<b>Total</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>4,507</b>	<b>100.0</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>1,833</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	29	87.9		866	40.6		32	100.0		613	100.0		
\$100,001 - \$250,000	1	3.0		140	6.6		0	0.0		0	0.0		
\$250,001 - \$1 Million	3	9.1		1,126	52.8		0	0.0		0	0.0		
<b>Total</b>	<b>33</b>	<b>100.0</b>		<b>2,132</b>	<b>100.0</b>		<b>32</b>	<b>100.0</b>		<b>613</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA Pennsylvania (Group D)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.6	0	0.0	0.4	0.6
Moderate	1	12.5	6.7	132	10.8	5.4	8.1
Middle	7	87.5	92.6	1,088	89.2	94.2	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,220</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	1	4.5	0.3	25	1.2	0.2	0.6
Moderate	1	4.5	6.7	100	4.7	4.8	8.1
Middle	20	90.9	93.0	1,983	94.1	95.1	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,108</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.6	0	0.0	0.2	0.6
Moderate	0	0.0	8.8	0	0.0	7.2	8.1
Middle	9	100.0	90.6	451	100.0	92.5	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>451</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	11.6
Moderate	0	0.0	4.2	0	0.0	0.8	6.3
Middle	0	0.0	95.8	0	0.0	99.2	82.1
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	1	2.5	0.5	25	0.6	0.3	0.6
Moderate	2	5.0	6.9	232	6.0	5.1	8.1
Middle	37	92.5	92.6	3,604	93.3	94.6	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>3,861</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA Pennsylvania (Group D)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.6	0	0.0	0.5	0	0.0	0.8	0	0.0	0.8	0.6
Moderate	1	20.0	4.6	55	9.1	4.1	0	0.0	7.1	0	0.0	5.3	8.1
Middle	4	80.0	94.9	548	90.9	95.4	13	100.0	92.1	1,776	100.0	93.9	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>603</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,776</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.4	0	0.0	0.4	0.6
Moderate	0	0.0	7.1	0	0.0	6.1	0	0.0	5.0	0	0.0	4.0	8.1
Middle	26	100.0	92.5	3,506	100.0	93.6	34	100.0	94.6	4,211	100.0	95.6	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>3,506</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>4,211</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.2	0.6
Moderate	0	0.0	6.5	0	0.0	6.8	0	0.0	9.0	0	0.0	6.7	8.1
Middle	10	100.0	93.2	470	100.0	92.9	22	100.0	90.7	1,119	100.0	93.1	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>470</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>1,119</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	4.8	0	0.0	4.4	0	0.0	17.6	0	0.0	17.5	11.6
Moderate	0	0.0	4.8	0	0.0	2.2	0	0.0	5.9	0	0.0	3.1	6.3
Middle	0	0.0	90.5	0	0.0	93.4	0	0.0	76.5	0	0.0	79.4	82.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.5	0	0.0	0.5	0	0.0	0.6	0	0.0	0.7	0.6
Moderate	1	2.4	6.2	55	1.2	5.2	0	0.0	6.3	0	0.0	4.7	8.1
Middle	41	97.6	93.4	4,549	98.8	94.3	70	100.0	93.1	7,209	100.0	94.6	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>4,604</b>	<b>100.0</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>7,209</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA Pennsylvania (Group D)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	1	3.4	2.3	300	7.7	2.0	3.5
Moderate	0	0.0	5.0	0	0.0	6.5	6.7
Middle	28	96.6	90.5	3,578	92.3	90.8	89.8
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.1	0	0.0	0.7	
<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>3,878</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: Non-MSA Pennsylvania (Group D)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Businesses %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
Low	3	5.7	3.7	328	8.0	2.7	0	0.0	2.5	0	0.0	1.9	3.7	
Moderate	2	3.8	5.8	29	0.7	6.2	0	0.0	5.6	0	0.0	6.2	6.6	
Middle	48	90.6	90.3	3,768	91.3	91.0	25	100.0	91.0	2,523	100.0	91.8	89.6	
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	1.0	0	0.0	0.2		
<b>Total</b>	<b>53</b>	<b>100.0</b>	<b>100.0</b>	<b>4,125</b>	<b>100.0</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>2,523</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Non-MSA Pennsylvania (Group D)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	2	25.0	8.5	151	12.4	4.4	19.9
<b>Moderate</b>	3	37.5	24.9	311	25.5	18.3	19.5
<b>Middle</b>	1	12.5	23.2	132	10.8	22.7	23.0
<b>Upper</b>	2	25.0	34.8	626	51.3	46.3	37.6
<b>Unknown</b>	0	0.0	8.5	0	0.0	8.3	0.0
<b>Total</b>	8	100.0	100.0	1,220	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	3	13.6	9.4	125	5.9	5.3	19.9
<b>Moderate</b>	2	9.1	16.7	150	7.1	11.2	19.5
<b>Middle</b>	9	40.9	24.0	845	40.1	20.2	23.0
<b>Upper</b>	8	36.4	40.4	988	46.9	48.7	37.6
<b>Unknown</b>	0	0.0	9.6	0	0.0	14.5	0.0
<b>Total</b>	22	100.0	100.0	2,108	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	3	33.3	8.2	105	23.3	6.9	19.9
<b>Moderate</b>	1	11.1	18.8	25	5.5	14.8	19.5
<b>Middle</b>	3	33.3	19.8	270	59.9	17.5	23.0
<b>Upper</b>	2	22.2	48.9	51	11.3	55.9	37.6
<b>Unknown</b>	0	0.0	4.3	0	0.0	4.9	0.0
<b>Total</b>	9	100.0	100.0	451	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	8	20.0	9.0	381	9.9	5.0	19.9
<b>Moderate</b>	6	15.0	20.6	486	12.6	15.3	19.5
<b>Middle</b>	13	32.5	22.8	1,247	32.3	21.3	23.0
<b>Upper</b>	12	30.0	39.1	1,665	43.1	47.8	37.6
<b>Unknown</b>	1	2.5	8.5	82	2.1	10.6	0.0
<b>Total</b>	40	100.0	100.0	3,861	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA Pennsylvania (Group D)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	40.0	8.7	124	20.6	4.4	2	15.4	8.4	215	12.1	4.5	19.9
Moderate	1	20.0	22.8	38	6.3	16.9	4	30.8	22.1	436	24.5	16.5	19.5
Middle	0	0.0	25.8	0	0.0	25.2	5	38.5	23.7	689	38.8	21.9	23.0
Upper	2	40.0	31.9	441	73.1	43.4	2	15.4	30.7	436	24.5	43.0	37.6
Unknown	0	0.0	10.9	0	0.0	10.1	0	0.0	15.1	0	0.0	14.0	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>603</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,776</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	7	26.9	6.0	218	6.2	3.1	1	2.9	4.7	25	0.6	2.7	19.9
Moderate	3	11.5	15.9	308	8.8	10.6	10	29.4	16.2	957	22.7	11.7	19.5
Middle	5	19.2	22.1	538	15.3	17.7	11	32.4	22.5	1,400	33.2	20.1	23.0
Upper	11	42.3	40.6	2,442	69.7	50.4	12	35.3	42.0	1,829	43.4	47.7	37.6
Unknown	0	0.0	15.4	0	0.0	18.2	0	0.0	14.7	0	0.0	17.8	0.0
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>3,506</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>4,211</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	20.0	9.9	125	26.6	7.6	3	13.6	10.6	135	12.1	7.7	19.9
Moderate	1	10.0	16.3	50	10.6	14.5	3	13.6	16.7	135	12.1	14.4	19.5
Middle	1	10.0	18.4	75	16.0	13.5	9	40.9	19.0	498	44.5	15.2	23.0
Upper	5	50.0	52.4	190	40.4	61.1	7	31.8	49.2	351	31.4	58.3	37.6
Unknown	1	10.0	3.1	30	6.4	3.3	0	0.0	4.5	0	0.0	4.4	0.0
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>470</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>1,119</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	11	26.2	7.6	467	10.1	4.0	6	8.6	6.9	375	5.2	3.8	19.9
Moderate	5	11.9	18.4	396	8.6	13.5	17	24.3	18.5	1,528	21.2	13.9	19.5
Middle	6	14.3	22.9	613	13.3	20.7	25	35.7	22.5	2,587	35.9	20.6	23.0
Upper	18	42.9	38.2	3,073	66.7	47.3	21	30.0	38.0	2,616	36.3	46.0	37.6
Unknown	2	4.8	12.9	55	1.2	14.5	1	1.4	14.0	103	1.4	15.7	0.0
<b>Total</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>4,604</b>	<b>100.0</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>7,209</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA Pennsylvania (Group D)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	16	55.2	41.5	783	20.2	36.3	89.1
Over \$1 Million	12	41.4		3,053	78.7		8.2
Revenue Unknown	1	3.4		42	1.1		2.7
<b>Total</b>	<b>29</b>	<b>100.0</b>		<b>3,878</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	21	72.4	91.5	587	15.1	38.2	
\$100,001 - \$250,000	3	10.3	5.6	708	18.3	23.3	
\$250,001 - \$1 Million	5	17.2	2.8	2,583	66.6	38.5	
<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>3,878</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	14	87.5		325	41.5		
\$100,001 - \$250,000	2	12.5		458	58.5		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>16</b>	<b>100.0</b>		<b>783</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA Pennsylvania (Group D)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	26	49.1	37.2	892	21.6	27.9	5	20.0	53.0	95	3.8	33.6	89.5
Over \$1 Million	14	26.4		2,875	69.7		5	20.0		1,633	64.7		7.8
Revenue Unknown	13	24.5		358	8.7		15	60.0		795	31.5		2.8
<b>Total</b>	<b>53</b>	<b>100.0</b>		<b>4,125</b>	<b>100.0</b>		<b>25</b>	<b>100.0</b>		<b>2,523</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	44	83.0	86.8	1,311	31.8	34.5	18	72.0	91.3	430	17.0	37.1	
\$100,001 - \$250,000	4	7.5	8.9	612	14.8	26.2	4	16.0	5.2	669	26.5	21.2	
\$250,001 - \$1 Million	5	9.4	4.4	2,202	53.4	39.3	3	12.0	3.5	1,424	56.4	41.7	
<b>Total</b>	<b>53</b>	<b>100.0</b>	<b>100.0</b>	<b>4,125</b>	<b>100.0</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>2,523</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	25	96.2		536	60.1		5	100.0		95	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	1	3.8		356	39.9		0	0.0		0	0.0		
<b>Total</b>	<b>26</b>	<b>100.0</b>		<b>892</b>	<b>100.0</b>		<b>5</b>	<b>100.0</b>		<b>95</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 12580 (Baltimore-Columbia-Towson, MD)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	43	8.0	3.6	5,909	4.4	1.9	4.9
Moderate	128	23.8	17.4	19,549	14.5	12.0	17.3
Middle	207	38.5	40.4	47,964	35.6	36.7	38.2
Upper	159	29.6	38.4	61,461	45.6	49.4	39.5
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>537</b>	<b>100.0</b>	<b>100.0</b>	<b>134,883</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	29	3.1	1.8	3,014	1.7	0.9	4.9
Moderate	147	15.5	11.5	15,085	8.4	7.8	17.3
Middle	384	40.5	39.5	60,600	33.8	34.6	38.2
Upper	386	40.8	47.2	100,585	56.1	56.6	39.5
Unknown	1	0.1	0.1	163	0.1	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>947</b>	<b>100.0</b>	<b>100.0</b>	<b>179,447</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	15	2.8	2.2	826	2.0	2.0	4.9
Moderate	81	15.1	9.7	4,307	10.5	7.6	17.3
Middle	208	38.8	35.1	13,324	32.6	29.8	38.2
Upper	232	43.3	52.9	22,381	54.8	60.6	39.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>536</b>	<b>100.0</b>	<b>100.0</b>	<b>40,838</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	1	11.1	15.8	450	0.5	4.9	9.5
Moderate	2	22.2	32.0	2,135	2.2	35.4	30.7
Middle	3	33.3	35.1	27,265	28.2	26.2	38.5
Upper	3	33.3	14.0	66,930	69.2	33.0	20.8
Unknown	0	0.0	3.2	0	0.0	0.4	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>96,780</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	96	4.5	3.0	11,120	2.4	1.8	4.9
Moderate	396	18.5	15.0	46,193	9.8	12.3	17.3
Middle	847	39.7	39.7	157,646	33.5	35.0	38.2
Upper	796	37.3	42.2	255,886	54.3	50.9	39.5
Unknown	1	0.0	0.1	163	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2,136</b>	<b>100.0</b>	<b>100.0</b>	<b>471,008</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 12580 (Baltimore-Columbia-Towson, MD)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	46	7.8	3.9	6,275	3.9	2.2	29	6.3	4.7	4,196	3.1	2.5	4.9
Moderate	153	26.1	17.0	28,541	17.5	11.9	115	25.0	17.7	21,287	15.7	12.4	17.3
Middle	235	40.1	40.5	56,222	34.6	36.6	175	38.0	40.1	50,705	37.3	36.8	38.2
Upper	151	25.8	38.5	71,529	44.0	49.3	141	30.7	37.3	59,607	43.9	48.3	39.5
Unknown	1	0.2	0.1	103	0.1	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>586</b>	<b>100.0</b>	<b>100.0</b>	<b>162,670</b>	<b>100.0</b>	<b>100.0</b>	<b>460</b>	<b>100.0</b>	<b>100.0</b>	<b>135,795</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	20	2.1	1.2	2,805	1.1	0.7	29	2.6	1.9	4,276	1.6	1.0	4.9
Moderate	130	13.6	9.2	17,576	7.1	6.4	188	17.1	11.9	29,532	11.2	8.2	17.3
Middle	386	40.5	37.4	81,900	33.2	32.7	431	39.3	39.0	86,462	32.7	34.0	38.2
Upper	418	43.8	52.2	144,275	58.5	60.1	449	40.9	47.1	144,441	54.6	56.7	39.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>954</b>	<b>100.0</b>	<b>100.0</b>	<b>246,556</b>	<b>100.0</b>	<b>100.0</b>	<b>1,097</b>	<b>100.0</b>	<b>100.0</b>	<b>264,711</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	7	1.4	1.5	380	0.9	1.1	8	1.3	1.9	303	0.6	1.4	4.9
Moderate	66	13.0	8.6	4,230	9.6	7.1	72	12.1	8.6	4,380	8.2	6.2	17.3
Middle	196	38.7	34.1	15,492	35.0	28.7	226	37.9	34.0	17,098	31.9	29.2	38.2
Upper	237	46.8	55.8	24,171	54.6	63.2	291	48.7	55.5	31,777	59.3	63.2	39.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>506</b>	<b>100.0</b>	<b>100.0</b>	<b>44,273</b>	<b>100.0</b>	<b>100.0</b>	<b>597</b>	<b>100.0</b>	<b>100.0</b>	<b>53,558</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	1	7.7	20.1	7,890	2.4	7.7	2	25.0	15.8	650	0.6	4.3	
Moderate	3	23.1	24.7	4,881	1.5	22.8	0	0.0	32.1	0	0.0	26.3	30.7
Middle	6	46.2	37.9	215,977	64.3	47.8	5	62.5	32.1	63,888	59.9	29.7	38.5
Upper	3	23.1	14.4	106,892	31.8	21.4	1	12.5	19.4	42,137	39.5	39.7	20.8
Unknown	0	0.0	2.9	0	0.0	0.2	0	0.0	0.5	0	0.0	0.0	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>335,640</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>106,675</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	104	4.4	2.4	20,922	2.5	1.5	88	3.9	3.0	11,080	1.9	1.9	
Moderate	453	19.1	12.5	69,260	8.2	9.1	405	17.8	14.2	59,203	10.2	10.6	17.3
Middle	952	40.2	38.5	395,837	46.8	34.7	876	38.6	39.3	226,651	39.1	34.9	38.2
Upper	858	36.2	46.6	360,253	42.6	54.7	901	39.7	43.4	282,597	48.8	52.6	39.5
Unknown	1	0.0	0.1	103	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2,368</b>	<b>100.0</b>	<b>100.0</b>	<b>846,375</b>	<b>100.0</b>	<b>100.0</b>	<b>2,270</b>	<b>100.0</b>	<b>100.0</b>	<b>579,531</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 12580 (Baltimore-Columbia-Towson, MD)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	90	4.2	4.1	15,269	6.6	4.6	4.9
Moderate	308	14.4	13.9	30,174	13.0	12.4	15.4
Middle	873	40.7	37.5	93,915	40.4	40.4	38.1
Upper	853	39.8	43.3	89,991	38.7	41.3	41.0
Unknown	20	0.9	0.4	2,896	1.2	0.8	0.7
Tract-Unk	0	0.0	0.8	0	0.0	0.4	
<b>Total</b>	<b>2,144</b>	<b>100.0</b>	<b>100.0</b>	<b>232,245</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 12580 (Baltimore-Columbia-Towson, MD)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	296	4.2	4.1	37,525	5.3	4.4	263	4.6	4.7	22,066	4.8	5.1	5.0
Moderate	993	14.1	13.8	93,773	13.3	12.4	846	14.9	15.2	62,004	13.5	13.0	15.7
Middle	2,751	39.0	37.7	275,965	39.1	39.1	2,278	40.0	38.4	195,058	42.5	39.3	38.1
Upper	2,952	41.9	43.6	288,771	40.9	42.9	2,267	39.8	41.0	176,449	38.4	41.7	40.6
Unknown	58	0.8	0.5	9,857	1.4	1.0	39	0.7	0.5	3,919	0.9	0.9	0.6
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>7,050</b>	<b>100.0</b>	<b>100.0</b>	<b>705,891</b>	<b>100.0</b>	<b>100.0</b>	<b>5,693</b>	<b>100.0</b>	<b>100.0</b>	<b>459,496</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 12580 (Baltimore-Columbia-Towson, MD)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	110	20.5	10.3	15,466	11.5	5.6	22.3
<b>Moderate</b>	122	22.7	22.5	25,616	19.0	17.5	17.0
<b>Middle</b>	105	19.6	20.8	27,607	20.5	21.0	19.8
<b>Upper</b>	131	24.4	27.3	51,199	38.0	38.4	40.8
<b>Unknown</b>	69	12.8	19.1	14,995	11.1	17.5	0.0
<b>Total</b>	537	100.0	100.0	134,883	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	163	17.2	7.3	14,828	8.3	3.7	22.3
<b>Moderate</b>	224	23.7	15.0	26,387	14.7	10.4	17.0
<b>Middle</b>	203	21.4	19.3	36,038	20.1	17.2	19.8
<b>Upper</b>	323	34.1	32.4	94,908	52.9	40.5	40.8
<b>Unknown</b>	34	3.6	26.1	7,286	4.1	28.2	0.0
<b>Total</b>	947	100.0	100.0	179,447	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	84	15.7	8.7	4,909	12.0	6.0	22.3
<b>Moderate</b>	145	27.1	17.1	9,264	22.7	13.8	17.0
<b>Middle</b>	119	22.2	23.0	7,761	19.0	18.8	19.8
<b>Upper</b>	177	33.0	48.3	18,442	45.2	57.3	40.8
<b>Unknown</b>	11	2.1	2.9	462	1.1	4.1	0.0
<b>Total</b>	536	100.0	100.0	40,838	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	357	16.8	8.9	35,203	9.4	4.8	22.3
<b>Moderate</b>	491	23.1	18.8	61,267	16.4	14.3	17.0
<b>Middle</b>	427	20.1	19.9	71,406	19.1	19.0	19.8
<b>Upper</b>	631	29.7	30.0	164,549	44.0	39.1	40.8
<b>Unknown</b>	221	10.4	22.5	41,803	11.2	22.8	0.0
<b>Total</b>	2,127	100.0	100.0	374,228	100.0	100.0	100.0



Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 12580 (Baltimore-Columbia-Towson, MD)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	98	16.7	10.4	16,022	9.8	5.8	81	17.6	9.9	13,412	9.9	5.5	22.3
Moderate	160	27.3	24.6	33,011	20.3	19.5	110	23.9	22.8	26,721	19.7	17.9	17.0
Middle	97	16.6	19.9	25,922	15.9	20.1	77	16.7	19.4	23,887	17.6	19.3	19.8
Upper	120	20.5	28.0	54,842	33.7	38.6	127	27.6	26.7	54,916	40.4	36.7	40.8
Unknown	111	18.9	17.1	32,873	20.2	16.0	65	14.1	21.3	16,859	12.4	20.6	0.0
<b>Total</b>	<b>586</b>	<b>100.0</b>	<b>100.0</b>	<b>162,670</b>	<b>100.0</b>	<b>100.0</b>	<b>460</b>	<b>100.0</b>	<b>100.0</b>	<b>135,795</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	132	13.8	4.5	14,261	5.8	2.4	152	13.9	6.3	17,981	6.8	3.5	22.3
Moderate	190	19.9	14.2	31,594	12.8	10.3	271	24.7	16.4	45,021	17.0	12.0	17.0
Middle	184	19.3	19.3	38,554	15.6	17.4	260	23.7	19.6	59,021	22.3	17.7	19.8
Upper	382	40.0	36.1	144,468	58.6	42.5	356	32.5	32.4	125,451	47.4	40.1	40.8
Unknown	66	6.9	25.8	17,679	7.2	27.4	58	5.3	25.3	17,237	6.5	26.7	0.0
<b>Total</b>	<b>954</b>	<b>100.0</b>	<b>100.0</b>	<b>246,556</b>	<b>100.0</b>	<b>100.0</b>	<b>1,097</b>	<b>100.0</b>	<b>100.0</b>	<b>264,711</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	71	14.0	7.2	4,722	10.7	4.4	75	12.6	5.9	3,865	7.2	3.4	22.3
Moderate	97	19.2	15.0	5,971	13.5	11.3	104	17.4	14.1	6,350	11.9	11.0	17.0
Middle	117	23.1	22.0	8,554	19.3	18.2	153	25.6	22.6	11,999	22.4	19.2	19.8
Upper	208	41.1	53.0	24,076	54.4	62.6	250	41.9	54.5	30,101	56.2	61.5	40.8
Unknown	13	2.6	2.8	950	2.1	3.6	15	2.5	2.9	1,243	2.3	4.9	0.0
<b>Total</b>	<b>506</b>	<b>100.0</b>	<b>100.0</b>	<b>44,273</b>	<b>100.0</b>	<b>100.0</b>	<b>597</b>	<b>100.0</b>	<b>100.0</b>	<b>53,558</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	301	12.8	6.5	35,005	6.9	3.6	308	13.6	7.6	35,258	7.5	4.3	22.3
Moderate	447	19.0	17.4	70,576	13.8	13.4	485	21.4	18.5	78,092	16.5	14.3	17.0
Middle	398	16.9	19.0	73,030	14.3	18.0	490	21.7	19.4	94,907	20.1	18.3	19.8
Upper	710	30.1	32.8	223,386	43.7	40.5	733	32.4	30.7	210,468	44.5	38.8	40.8
Unknown	499	21.2	24.3	108,738	21.3	24.4	246	10.9	23.7	54,131	11.4	24.3	0.0
<b>Total</b>	<b>2,355</b>	<b>100.0</b>	<b>100.0</b>	<b>510,735</b>	<b>100.0</b>	<b>100.0</b>	<b>2,262</b>	<b>100.0</b>	<b>100.0</b>	<b>472,856</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 12580 (Baltimore-Columbia-Towson, MD)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	1,352	63.1	47.4	72,157	31.1	30.7	91.2
<b>Over \$1 Million</b>	740	34.5		149,368	64.3		8.1
<b>Revenue Unknown</b>	52	2.4		10,720	4.6		0.7
<b>Total</b>	2,144	100.0		232,245	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	1,675	78.1	94.5	48,714	21.0	41.4	
<b>\$100,001 - \$250,000</b>	190	8.9	2.9	34,547	14.9	14.9	
<b>\$250,001 - \$1 Million</b>	279	13.0	2.7	148,984	64.1	43.7	
<b>Total</b>	2,144	100.0	100.0	232,245	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	1,217	90.0		28,570	39.6		
<b>\$100,001 - \$250,000</b>	65	4.8		11,637	16.1		
<b>\$250,001 - \$1 Million</b>	70	5.2		31,950	44.3		
<b>Total</b>	1,352	100.0		72,157	100.0		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 12580 (Baltimore-Columbia-Towson, MD)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	2,889	41.0	43.1	144,366	20.5	26.7	1,816	31.9	46.3	89,951	19.6	28.8	91.4
<b>Over \$1 Million</b>	1,485	21.1		345,267	48.9		992	17.4		212,588	46.3		7.8
<b>Revenue Unknown</b>	2,676	38.0		216,258	30.6		2,885	50.7		156,957	34.2		0.7
<b>Total</b>	7,050	100.0		705,891	100.0		5,693	100.0		459,496	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	5,244	74.4	86.5	171,121	24.2	30.8	4,559	80.1	92.0	127,698	27.8	37.2	
<b>\$100,001 - \$250,000</b>	1,045	14.8	7.8	167,397	23.7	21.3	674	11.8	4.6	108,264	23.6	18.7	
<b>\$250,001 - \$1 Million</b>	761	10.8	5.7	367,373	52.0	47.9	460	8.1	3.4	223,534	48.6	44.1	
<b>Total</b>	7,050	100.0	100.0	705,891	100.0	100.0	5,693	100.0	100.0	459,496	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	2,653	91.8		75,455	52.3		1,641	90.4		44,412	49.4		
<b>\$100,001 - \$250,000</b>	142	4.9		21,746	15.1		116	6.4		18,523	20.6		
<b>\$250,001 - \$1 Million</b>	94	3.3		47,165	32.7		59	3.2		27,016	30.0		
<b>Total</b>	2,889	100.0		144,366	100.0		1,816	100.0		89,951	100.0		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 15680 (California-Lexington Park, MD)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	6.8	0	0.0	4.3	2.7
Moderate	2	40.0	8.1	402	35.3	7.4	8.6
Middle	2	40.0	68.7	438	38.5	70.2	67.7
Upper	1	20.0	16.4	298	26.2	18.1	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>1,138</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	2.9	0	0.0	2.2	2.7
Moderate	0	0.0	7.2	0	0.0	6.6	8.6
Middle	3	100.0	69.4	562	100.0	67.8	67.7
Upper	0	0.0	20.5	0	0.0	23.5	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>562</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	2.7
Moderate	0	0.0	3.7	0	0.0	2.4	8.6
Middle	8	100.0	77.0	470	100.0	76.9	67.7
Upper	0	0.0	19.3	0	0.0	20.7	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>470</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	25.0	0	0.0	14.0	15.7
Moderate	0	0.0	0.0	0	0.0	0.0	24.3
Middle	0	0.0	25.0	0	0.0	16.8	52.0
Upper	0	0.0	50.0	0	0.0	69.3	8.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	5.1	0	0.0	3.5	2.7
Moderate	3	13.6	7.6	627	18.3	7.1	8.6
Middle	18	81.8	69.5	2,499	73.0	69.4	67.7
Upper	1	4.5	17.8	298	8.7	20.1	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>3,424</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 15680 (California-Lexington Park, MD)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.6	0	0.0	2.4	0	0.0	6.0	0	0.0	3.8	2.7
Moderate	0	0.0	7.8	0	0.0	7.2	0	0.0	8.4	0	0.0	7.1	8.6
Middle	2	66.7	69.7	561	78.9	69.9	1	50.0	68.7	213	39.0	69.9	67.7
Upper	1	33.3	19.0	150	21.1	20.5	1	50.0	16.9	333	61.0	19.1	21.0
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	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>711</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>546</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.8	0	0.0	2.0	0	0.0	3.3	0	0.0	2.3	2.7
Moderate	1	9.1	6.2	225	10.3	5.7	0	0.0	6.8	0	0.0	6.2	8.6
Middle	8	72.7	70.6	1,462	66.9	70.1	11	100.0	70.3	1,947	100.0	69.6	67.7
Upper	2	18.2	20.4	499	22.8	22.2	0	0.0	19.6	0	0.0	21.9	21.0
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	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>2,186</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,947</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.4	0	0.0	3.4	0	0.0	0.0	0	0.0	0.0	2.7
Moderate	0	0.0	4.8	0	0.0	6.3	1	7.7	5.3	50	6.3	3.2	8.6
Middle	1	100.0	73.4	100	100.0	69.0	11	84.6	70.7	707	89.6	69.3	67.7
Upper	0	0.0	19.4	0	0.0	21.2	1	7.7	24.0	32	4.1	27.5	21.0
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>789</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	33.3	0	0.0	43.8	15.7
Moderate	0	0.0	100.0	0	0.0	100.0	0	0.0	33.3	0	0.0	18.7	24.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	33.3	0	0.0	37.5	52.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	8.0
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	3.1	0	0.0	2.2	0	0.0	4.3	0	0.0	3.0	2.7
Moderate	1	5.0	6.8	225	5.5	6.6	1	3.4	7.4	50	1.3	6.6	8.6
Middle	16	80.0	70.3	3,237	78.7	69.8	26	89.7	69.7	3,456	89.3	69.7	67.7
Upper	3	15.0	19.8	649	15.8	21.4	2	6.9	18.6	365	9.4	20.7	21.0
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	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>4,111</b>	<b>100.0</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>3,871</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 15680 (California-Lexington Park, MD)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Low	0	0.0	4.5	0	0.0	7.0	5.7
Moderate	0	0.0	7.7	0	0.0	6.3	9.1
Middle	2	100.0	63.8	110	100.0	64.1	64.1
Upper	0	0.0	22.0	0	0.0	22.0	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.9	0	0.0	0.6	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: MSA 15680 (California-Lexington Park, MD)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Businesses %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%		
Low	0	0.0	4.3	0	0.0	5.9	0	0.0	3.9	0	0.0	3.8	5.5	
Moderate	0	0.0	7.6	0	0.0	7.0	1	5.9	8.3	26	5.7	6.2	9.1	
Middle	21	95.5	65.6	1,405	99.2	65.6	15	88.2	66.5	401	87.7	65.1	64.6	
Upper	1	4.5	22.1	11	0.8	21.3	1	5.9	20.8	30	6.6	24.9	20.8	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.5	0	0.0	0.2	0	0.0	0.5	0	0.0	0.1		
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>1,416</b>	<b>100.0</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>457</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 15680 (California-Lexington Park, MD)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	20.0	7.5	134	11.8	4.5	20.1
<b>Moderate</b>	0	0.0	22.3	0	0.0	18.8	16.9
<b>Middle</b>	3	60.0	22.8	823	72.3	23.5	24.6
<b>Upper</b>	1	20.0	22.6	181	15.9	29.5	38.3
<b>Unknown</b>	0	0.0	24.7	0	0.0	23.7	0.0
<b>Total</b>	5	100.0	100.0	1,138	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	5.2	0	0.0	2.9	20.1
<b>Moderate</b>	0	0.0	12.4	0	0.0	8.8	16.9
<b>Middle</b>	1	33.3	17.9	65	11.6	16.6	24.6
<b>Upper</b>	0	0.0	29.5	0	0.0	33.4	38.3
<b>Unknown</b>	2	66.7	35.1	497	88.4	38.3	0.0
<b>Total</b>	3	100.0	100.0	562	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	8.0	0	0.0	6.0	20.1
<b>Moderate</b>	3	37.5	17.1	115	24.5	15.6	16.9
<b>Middle</b>	4	50.0	26.7	295	62.8	21.3	24.6
<b>Upper</b>	1	12.5	47.1	60	12.8	55.5	38.3
<b>Unknown</b>	0	0.0	1.1	0	0.0	1.6	0.0
<b>Total</b>	8	100.0	100.0	470	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	1	4.5	6.6	134	3.9	3.9	20.1
<b>Moderate</b>	3	13.6	18.1	115	3.4	14.8	16.9
<b>Middle</b>	8	36.4	20.8	1,183	34.6	20.5	24.6
<b>Upper</b>	2	9.1	26.1	241	7.0	30.9	38.3
<b>Unknown</b>	8	36.4	28.4	1,751	51.1	29.9	0.0
<b>Total</b>	22	100.0	100.0	3,424	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 15680 (California-Lexington Park, MD)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	1	33.3	7.2	219	30.8	4.4	0	0.0	9.1	0	0.0	5.8	20.1
Moderate	0	0.0	23.0	0	0.0	19.7	0	0.0	24.5	0	0.0	22.0	16.9
Middle	1	33.3	24.6	150	21.1	25.3	0	0.0	23.0	0	0.0	24.4	24.6
Upper	1	33.3	25.0	342	48.1	31.0	1	50.0	17.0	333	61.0	22.3	38.3
Unknown	0	0.0	20.3	0	0.0	19.7	1	50.0	26.4	213	39.0	25.5	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>711</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>546</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	27.3	2.8	454	20.8	1.6	2	18.2	5.7	125	6.4	3.7	20.1
Moderate	1	9.1	9.8	135	6.2	7.3	4	36.4	14.0	671	34.5	11.6	16.9
Middle	2	18.2	17.5	474	21.7	15.4	2	18.2	20.3	537	27.6	19.0	24.6
Upper	4	36.4	28.6	863	39.5	31.1	2	18.2	22.3	357	18.3	26.1	38.3
Unknown	1	9.1	41.4	260	11.9	44.7	1	9.1	37.8	257	13.2	39.6	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>2,186</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,947</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.8	0	0.0	4.0	2	15.4	8.7	150	19.0	6.3	20.1
Moderate	0	0.0	8.9	0	0.0	8.8	2	15.4	18.7	188	23.8	14.8	16.9
Middle	0	0.0	26.6	0	0.0	27.8	8	61.5	29.3	401	50.8	26.3	24.6
Upper	1	100.0	59.7	100	100.0	59.4	1	7.7	39.3	50	6.3	48.5	38.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.0	0	0.0	4.1	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>789</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	4	20.0	4.4	673	16.4	2.6	4	13.8	7.0	275	7.1	4.6	20.1
Moderate	1	5.0	14.3	135	3.3	12.0	6	20.7	18.1	859	22.2	16.1	16.9
Middle	3	15.0	19.7	624	15.2	18.9	10	34.5	21.3	938	24.2	21.2	24.6
Upper	6	30.0	27.3	1,305	31.7	30.7	4	13.8	20.5	740	19.1	24.5	38.3
Unknown	6	30.0	34.3	1,374	33.4	35.8	5	17.2	33.1	1,059	27.4	33.6	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>4,111</b>	<b>100.0</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>3,871</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 15680 (California-Lexington Park, MD)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	1	50.0	47.6	25	22.7	42.6	92.4
Over \$1 Million	1	50.0		85	77.3		6.7
Revenue Unknown	0	0.0		0	0.0		0.9
<b>Total</b>	<b>2</b>	<b>100.0</b>		<b>110</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	2	100.0	91.6	110	100.0	33.0	
\$100,001 - \$250,000	0	0.0	4.7	0	0.0	18.1	
\$250,001 - \$1 Million	0	0.0	3.7	0	0.0	48.9	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	1	100.0		25	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>1</b>	<b>100.0</b>		<b>25</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 15680 (California-Lexington Park, MD)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	8	36.4	35.1	294	20.8	21.2	6	35.3	48.6	116	25.4	34.0	92.4
Over \$1 Million	4	18.2		756	53.4		3	17.6		179	39.2		6.6
Revenue Unknown	10	45.5		366	25.8		8	47.1		162	35.4		1.0
<b>Total</b>	<b>22</b>	<b>100.0</b>		<b>1,416</b>	<b>100.0</b>		<b>17</b>	<b>100.0</b>		<b>457</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	18	81.8	85.3	505	35.7	31.6	16	94.1	90.1	352	77.0	32.4	
\$100,001 - \$250,000	3	13.6	9.7	411	29.0	25.0	1	5.9	5.6	105	23.0	18.9	
\$250,001 - \$1 Million	1	4.5	5.1	500	35.3	43.4	0	0.0	4.3	0	0.0	48.6	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>1,416</b>	<b>100.0</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>457</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	7	87.5		188	63.9		6	100.0		116	100.0		
\$100,001 - \$250,000	1	12.5		106	36.1		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
<b>Total</b>	<b>8</b>	<b>100.0</b>		<b>294</b>	<b>100.0</b>		<b>6</b>	<b>100.0</b>		<b>116</b>	<b>100.0</b>		



Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 25180 (Hagerstown-Martinsburg, MD-WV)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	1.4	0	0.0	0.9	1.6
Moderate	12	33.3	16.6	1,549	24.3	11.0	12.9
Middle	12	33.3	50.2	2,346	36.7	49.5	50.7
Upper	12	33.3	31.7	2,489	39.0	38.6	34.8
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	
<b>Total</b>	36	100.0	100.0	6,384	100.0	100.0	100.0
<b>Refinance Loans</b>							
Low	0	0.0	0.8	0	0.0	0.4	1.6
Moderate	13	18.6	9.6	1,185	15.5	5.9	12.9
Middle	41	58.6	47.9	4,095	53.6	46.0	50.7
Upper	16	22.9	41.7	2,367	31.0	47.7	34.8
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	
<b>Total</b>	70	100.0	100.0	7,647	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	1.6
Moderate	6	13.3	10.3	331	12.5	8.3	12.9
Middle	29	64.4	49.8	1,631	61.7	46.9	50.7
Upper	10	22.2	39.9	683	25.8	44.8	34.8
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	
<b>Total</b>	45	100.0	100.0	2,645	100.0	100.0	100.0
<b>Multifamily Loans</b>							Multi-family Units %
Low	1	20.0	37.9	418	4.2	24.7	8.4
Moderate	2	40.0	20.7	537	5.3	4.0	30.8
Middle	1	20.0	34.5	8,850	88.2	70.6	54.5
Upper	1	20.0	6.9	234	2.3	0.8	6.3
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	
<b>Total</b>	5	100.0	100.0	10,039	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							Owner Occupied Units %
Low	1	0.6	1.4	418	1.5	1.9	1.6
Moderate	34	21.1	14.0	3,706	13.4	9.0	12.9
Middle	85	52.8	49.5	17,158	62.3	49.3	50.7
Upper	41	25.5	35.2	6,280	22.8	39.8	34.8
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	
<b>Total</b>	161	100.0	100.0	27,562	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 25180 (Hagerstown-Martinsburg, MD-WV)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	1	4.2	1.9	120	2.2	1.1	1	2.9	2.4	176	2.2	1.6	1.6
Moderate	2	8.3	14.5	333	6.0	9.3	5	14.7	17.9	641	8.0	12.0	12.9
Middle	14	58.3	50.3	3,002	54.1	49.1	23	67.6	48.4	5,968	74.7	49.0	50.7
Upper	7	29.2	33.4	2,091	37.7	40.4	5	14.7	31.3	1,205	15.1	37.4	34.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	5,546	100.0	100.0	34	100.0	100.0	7,990	100.0	100.0	100.0
<b>Refinance Loans</b>													
Low	0	0.0	0.7	0	0.0	0.4	4	4.7	1.1	431	3.0	0.8	1.6
Moderate	4	6.1	7.5	566	5.5	4.6	14	16.3	9.1	1,703	12.0	5.9	12.9
Middle	40	60.6	48.1	5,864	57.2	46.0	45	52.3	49.5	8,111	57.1	47.4	50.7
Upper	22	33.3	43.7	3,820	37.3	48.9	23	26.7	40.2	3,961	27.9	45.9	34.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	66	100.0	100.0	10,250	100.0	100.0	86	100.0	100.0	14,206	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
Low	0	0.0	1.1	0	0.0	0.4	1	2.0	1.3	20	0.5	0.9	1.6
Moderate	4	11.8	9.0	230	11.4	7.0	6	12.0	14.2	211	5.7	13.4	12.9
Middle	23	67.6	54.3	1,326	65.6	51.2	27	54.0	51.6	1,571	42.3	46.0	50.7
Upper	7	20.6	35.6	465	23.0	41.4	16	32.0	32.9	1,914	51.5	39.8	34.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	2,021	100.0	100.0	50	100.0	100.0	3,716	100.0	100.0	100.0
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	1	50.0	17.1	405	48.6	6.1	2	40.0	15.5	1,678	42.6	4.3	
Moderate	1	50.0	34.3	428	51.4	11.9	1	20.0	43.7	22	0.6	21.4	30.8
Middle	0	0.0	40.0	0	0.0	74.8	1	20.0	25.4	1,300	33.0	70.3	54.5
Upper	0	0.0	8.6	0	0.0	7.3	1	20.0	15.5	935	23.8	4.0	6.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	833	100.0	100.0	5	100.0	100.0	3,935	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	2	1.5	1.3	525	2.5	0.9	8	4.5	1.8	2,305	7.6	1.4	
Moderate	11	8.0	10.8	1,557	7.5	6.9	26	14.7	13.2	2,577	8.5	9.6	12.9
Middle	84	61.3	49.2	11,209	54.3	48.1	97	54.8	48.9	17,051	56.4	49.6	50.7
Upper	40	29.2	38.7	7,359	35.6	44.1	46	26.0	36.1	8,282	27.4	39.3	34.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	137	100.0	100.0	20,650	100.0	100.0	177	100.0	100.0	30,215	100.0	100.0	100.0

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 25180 (Hagerstown-Martinsburg, MD-WV)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	10	6.1	6.1	763	8.0	8.0	7.6
Moderate	24	14.7	15.5	1,174	12.4	18.2	14.4
Middle	86	52.8	48.7	4,832	50.9	46.8	48.9
Upper	43	26.4	29.0	2,717	28.6	26.7	29.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.3	
<b>Total</b>	<b>163</b>	<b>100.0</b>	<b>100.0</b>	<b>9,486</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 25180 (Hagerstown-Martinsburg, MD-WV)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	30	9.9	7.2	1,868	7.4	8.9	20	8.6	5.9	1,089	7.6	8.1	7.8
Moderate	45	14.9	13.2	3,776	14.9	12.7	33	14.2	12.9	1,248	8.7	13.5	14.1
Middle	163	53.8	51.1	13,356	52.6	54.5	123	53.0	50.8	8,778	61.2	53.0	49.6
Upper	65	21.5	28.3	6,393	25.2	23.9	56	24.1	30.1	3,236	22.5	25.3	28.5
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	0.2	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>303</b>	<b>100.0</b>	<b>100.0</b>	<b>25,393</b>	<b>100.0</b>	<b>100.0</b>	<b>232</b>	<b>100.0</b>	<b>100.0</b>	<b>14,351</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 25180 (Hagerstown-Martinsburg, MD-WV)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	2	5.6	6.0	242	3.8	3.4	20.1
Moderate	7	19.4	17.7	1,199	18.8	13.7	16.1
Middle	7	19.4	21.7	1,224	19.2	22.0	22.0
Upper	14	38.9	29.8	2,789	43.7	37.0	41.8
Unknown	6	16.7	24.9	930	14.6	23.8	0.0
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>6,384</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	8	11.4	4.9	410	5.4	2.5	20.1
Moderate	17	24.3	13.4	1,515	19.8	8.9	16.1
Middle	14	20.0	19.1	1,596	20.9	16.5	22.0
Upper	25	35.7	35.4	3,229	42.2	40.0	41.8
Unknown	6	8.6	27.2	897	11.7	32.1	0.0
<b>Total</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>7,647</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	6	13.3	10.3	300	11.3	7.1	20.1
Moderate	10	22.2	21.1	379	14.3	21.2	16.1
Middle	11	24.4	18.4	827	31.3	20.4	22.0
Upper	17	37.8	46.2	1,099	41.6	47.0	41.8
Unknown	1	2.2	4.0	40	1.5	4.4	0.0
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>2,645</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	16	10.3	5.7	952	5.4	3.1	20.1
Moderate	34	21.8	16.0	3,093	17.7	11.9	16.1
Middle	32	20.5	20.1	3,647	20.8	19.5	22.0
Upper	56	35.9	32.3	7,117	40.6	37.6	41.8
Unknown	18	11.5	25.9	2,714	15.5	28.0	0.0
<b>Total</b>	<b>156</b>	<b>100.0</b>	<b>100.0</b>	<b>17,523</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 25180 (Hagerstown-Martinsburg, MD-WV)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	4	16.7	6.4	593	10.7	3.8	8	23.5	6.4	1,087	13.6	3.6	20.1
Moderate	4	16.7	19.8	815	14.7	15.7	5	14.7	18.7	890	11.1	14.6	16.1
Middle	4	16.7	22.0	803	14.5	22.4	9	26.5	21.0	2,252	28.2	21.3	22.0
Upper	9	37.5	27.7	2,839	51.2	35.3	8	23.5	29.5	2,879	36.0	36.6	41.8
Unknown	3	12.5	24.1	496	8.9	22.8	4	11.8	24.3	882	11.0	23.8	0.0
<b>Total</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>5,546</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>7,990</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	4	6.1	3.1	395	3.9	1.6	6	7.0	4.7	588	4.1	2.6	20.1
Moderate	13	19.7	10.2	1,733	16.9	7.0	19	22.1	13.7	2,602	18.3	10.2	16.1
Middle	17	25.8	18.5	2,616	25.5	16.2	22	25.6	20.0	3,917	27.6	17.9	22.0
Upper	27	40.9	39.0	4,478	43.7	43.8	33	38.4	36.2	5,730	40.3	41.9	41.8
Unknown	5	7.6	29.2	1,028	10.0	31.5	6	7.0	25.3	1,369	9.6	27.4	0.0
<b>Total</b>	<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>10,250</b>	<b>100.0</b>	<b>100.0</b>	<b>86</b>	<b>100.0</b>	<b>100.0</b>	<b>14,206</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	4	11.8	7.4	285	14.1	6.3	10	20.0	10.2	352	9.5	8.3	20.1
Moderate	4	11.8	13.8	158	7.8	11.9	9	18.0	15.6	540	14.5	14.1	16.1
Middle	10	29.4	23.4	563	27.9	23.9	14	28.0	24.9	1,200	32.3	22.3	22.0
Upper	14	41.2	47.9	945	46.8	48.4	15	30.0	45.8	1,553	41.8	48.7	41.8
Unknown	2	5.9	7.4	70	3.5	9.5	2	4.0	3.6	71	1.9	6.5	0.0
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>2,021</b>	<b>100.0</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>3,716</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	12	8.9	4.5	1,273	6.4	2.5	24	14.0	5.5	2,027	7.7	3.1	20.1
Moderate	21	15.6	14.0	2,706	13.7	10.6	33	19.2	15.6	4,032	15.3	12.1	16.1
Middle	31	23.0	19.4	3,982	20.1	18.6	45	26.2	20.4	7,369	28.0	19.3	22.0
Upper	50	37.0	33.6	8,262	41.7	39.2	56	32.6	33.8	10,162	38.7	39.5	41.8
Unknown	21	15.6	28.5	3,594	18.1	29.1	14	8.1	24.7	2,690	10.2	25.9	0.0
<b>Total</b>	<b>135</b>	<b>100.0</b>	<b>100.0</b>	<b>19,817</b>	<b>100.0</b>	<b>100.0</b>	<b>172</b>	<b>100.0</b>	<b>100.0</b>	<b>26,280</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 25180 (Hagerstown-Martinsburg, MD-WV)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	114	69.9	44.4	3,380	35.6	34.2	90.3
Over \$1 Million	45	27.6		4,964	52.3		8.9
Revenue Unknown	4	2.5		1,142	12.0		0.8
<b>Total</b>	<b>163</b>	<b>100.0</b>		<b>9,486</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	143	87.7	94.3	3,399	35.8	41.7	
\$100,001 - \$250,000	10	6.1	3.0	1,943	20.5	16.2	
\$250,001 - \$1 Million	10	6.1	2.7	4,144	43.7	42.2	
<b>Total</b>	<b>163</b>	<b>100.0</b>	<b>100.0</b>	<b>9,486</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	108	94.7		2,188	64.7		
\$100,001 - \$250,000	5	4.4		872	25.8		
\$250,001 - \$1 Million	1	0.9		320	9.5		
<b>Total</b>	<b>114</b>	<b>100.0</b>		<b>3,380</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 25180 (Hagerstown-Martinsburg, MD-WV)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	146	48.2	36.7	7,949	31.3	26.9	85	36.6	42.5	3,602	25.1	27.6	90.6
Over \$1 Million	58	19.1		11,163	44.0		46	19.8		5,737	40.0		8.4
Revenue Unknown	99	32.7		6,281	24.7		101	43.5		5,012	34.9		0.9
<b>Total</b>	<b>303</b>	<b>100.0</b>		<b>25,393</b>	<b>100.0</b>		<b>232</b>	<b>100.0</b>		<b>14,351</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	241	79.5	87.2	7,838	30.9	33.5	198	85.3	92.6	5,641	39.3	42.3	
\$100,001 - \$250,000	37	12.2	8.0	5,595	22.0	22.7	22	9.5	5.0	3,480	24.2	23.0	
\$250,001 - \$1 Million	25	8.3	4.8	11,960	47.1	43.8	12	5.2	2.4	5,230	36.4	34.8	
<b>Total</b>	<b>303</b>	<b>100.0</b>	<b>100.0</b>	<b>25,393</b>	<b>100.0</b>	<b>100.0</b>	<b>232</b>	<b>100.0</b>	<b>100.0</b>	<b>14,351</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	127	87.0		3,341	42.0		77	90.6		1,932	53.6		
\$100,001 - \$250,000	12	8.2		1,916	24.1		5	5.9		637	17.7		
\$250,001 - \$1 Million	7	4.8		2,692	33.9		3	3.5		1,033	28.7		
<b>Total</b>	<b>146</b>	<b>100.0</b>		<b>7,949</b>	<b>100.0</b>		<b>85</b>	<b>100.0</b>		<b>3,602</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA Maryland (Group A)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.7	0	0.0	0.3	1.6
Moderate	4	8.9	17.3	598	6.8	13.1	13.9
Middle	37	82.2	64.6	7,030	79.8	58.6	65.9
Upper	4	8.9	17.4	1,184	13.4	28.0	18.7
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	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>8,812</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.4	0	0.0	0.2	1.6
Moderate	3	6.8	13.0	353	4.3	8.4	13.9
Middle	32	72.7	59.7	4,262	51.5	50.3	65.9
Upper	9	20.5	26.9	3,663	44.2	41.0	18.7
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	
<b>Total</b>	<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>8,278</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.6	0	0.0	1.0	1.6
Moderate	2	16.7	12.9	65	8.9	13.0	13.9
Middle	9	75.0	54.8	643	87.7	42.0	65.9
Upper	1	8.3	30.6	25	3.4	44.0	18.7
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	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>733</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	37.5	0	0.0	51.1	16.3
Moderate	0	0.0	50.0	0	0.0	46.4	43.8
Middle	0	0.0	12.5	0	0.0	2.5	31.0
Upper	0	0.0	0.0	0	0.0	0.0	8.8
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.8	0	0.0	2.3	1.6
Moderate	9	8.8	15.5	1,016	5.6	12.5	13.9
Middle	79	77.5	62.5	12,203	67.5	53.1	65.9
Upper	14	13.7	21.2	4,872	26.9	32.2	18.7
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	
<b>Total</b>	<b>102</b>	<b>100.0</b>	<b>100.0</b>	<b>18,091</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA Maryland (Group A)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	1.1	0	0.0	0.5	0	0.0	0.9	0	0.0	0.5	1.6
Moderate	5	12.8	15.8	1,056	11.9	11.3	4	12.9	16.5	889	13.3	12.1	13.9
Middle	29	74.4	61.1	5,943	66.8	55.7	25	80.6	63.8	5,119	76.3	56.3	65.9
Upper	5	12.8	21.9	1,903	21.4	32.5	2	6.5	18.8	700	10.4	31.1	18.7
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	
<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>8,902</b>	<b>100.0</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>6,708</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.6	0	0.0	0.4	0	0.0	0.6	0	0.0	0.4	1.6
Moderate	2	4.4	12.3	267	2.7	9.7	6	14.6	13.8	1,050	12.4	10.6	13.9
Middle	32	71.1	58.3	5,870	59.4	50.2	21	51.2	61.7	3,948	46.7	55.0	65.9
Upper	11	24.4	28.7	3,751	37.9	39.6	14	34.1	23.8	3,448	40.8	34.0	18.7
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	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>9,888</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>8,446</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	1	12.5	1.9	250	33.3	2.8	1.6
Moderate	3	20.0	11.5	245	22.0	8.1	0	0.0	14.4	0	0.0	9.8	13.9
Middle	7	46.7	54.8	344	30.9	45.7	5	62.5	54.8	315	41.9	50.1	65.9
Upper	5	33.3	33.7	525	47.1	46.2	2	25.0	28.8	186	24.8	37.3	18.7
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	
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>1,114</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>751</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.3
Moderate	0	0.0	33.3	0	0.0	42.4	0	0.0	57.1	0	0.0	76.1	43.8
Middle	0	0.0	66.7	0	0.0	57.6	0	0.0	35.7	0	0.0	10.3	31.0
Upper	0	0.0	0.0	0	0.0	0.0	1	100.0	7.1	4,725	100.0	13.6	8.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,725</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.9	0	0.0	0.5	1	1.2	0.8	250	1.2	0.5	1.6
Moderate	11	10.4	13.9	1,663	8.0	10.4	11	12.9	15.2	2,104	9.8	12.5	13.9
Middle	73	68.9	59.5	12,690	61.3	52.3	53	62.4	62.3	9,783	45.6	54.4	65.9
Upper	22	20.8	25.7	6,340	30.6	36.8	20	23.5	21.7	9,310	43.4	32.6	18.7
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	
<b>Total</b>	<b>106</b>	<b>100.0</b>	<b>100.0</b>	<b>20,693</b>	<b>100.0</b>	<b>100.0</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>21,447</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA Maryland (Group A)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	1	1.9	1.5	5	0.1	1.1	2.0
Moderate	14	26.4	21.2	237	4.5	24.3	24.3
Middle	28	52.8	51.3	3,654	69.9	49.2	51.7
Upper	10	18.9	23.2	1,331	25.5	24.5	22.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.7	0	0.0	0.9	
<b>Total</b>	<b>53</b>	<b>100.0</b>	<b>100.0</b>	<b>5,227</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Non-MSA Maryland (Group A)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	1	1.0	1.2	2	0.0	0.4	1	1.1	1.5	5	0.1	2.0	1.9
Moderate	23	23.2	22.9	2,374	29.9	27.2	22	23.7	20.1	1,178	22.8	23.6	24.2
Middle	47	47.5	48.1	2,675	33.7	39.7	48	51.6	53.8	2,242	43.4	39.6	51.7
Upper	28	28.3	27.2	2,898	36.5	32.5	22	23.7	23.8	1,743	33.7	34.6	22.2
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	0.7	0	0.0	0.2	0	0.0	0.8	0	0.0	0.2	
<b>Total</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>7,949</b>	<b>100.0</b>	<b>100.0</b>	<b>93</b>	<b>100.0</b>	<b>100.0</b>	<b>5,168</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Non-MSA Maryland (Group A)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	4	8.9	4.3	364	4.1	1.9	21.7
<b>Moderate</b>	8	17.8	15.9	1,310	14.9	10.3	16.0
<b>Middle</b>	16	35.6	20.3	2,812	31.9	16.4	21.3
<b>Upper</b>	13	28.9	39.7	3,763	42.7	54.2	41.0
<b>Unknown</b>	4	8.9	19.8	563	6.4	17.2	0.0
<b>Total</b>	45	100.0	100.0	8,812	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	3	6.8	5.8	329	4.0	2.9	21.7
<b>Moderate</b>	6	13.6	11.8	739	8.9	6.6	16.0
<b>Middle</b>	14	31.8	18.6	1,750	21.1	12.6	21.3
<b>Upper</b>	20	45.5	42.7	4,315	52.1	56.7	41.0
<b>Unknown</b>	1	2.3	21.0	1,145	13.8	21.1	0.0
<b>Total</b>	44	100.0	100.0	8,278	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	2	16.7	5.6	175	23.9	5.9	21.7
<b>Moderate</b>	2	16.7	12.9	75	10.2	12.5	16.0
<b>Middle</b>	1	8.3	23.4	20	2.7	15.2	21.3
<b>Upper</b>	6	50.0	55.6	438	59.8	65.7	41.0
<b>Unknown</b>	1	8.3	2.4	25	3.4	0.7	0.0
<b>Total</b>	12	100.0	100.0	733	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	9	8.8	4.8	868	4.8	2.3	21.7
<b>Moderate</b>	16	15.7	14.0	2,124	11.7	8.7	16.0
<b>Middle</b>	31	30.4	19.4	4,582	25.3	14.7	21.3
<b>Upper</b>	39	38.2	41.0	8,516	47.1	54.6	41.0
<b>Unknown</b>	7	6.9	20.9	2,001	11.1	19.6	0.0
<b>Total</b>	102	100.0	100.0	18,091	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA Maryland (Group A)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	5	12.8	5.5	716	8.0	2.5	3	9.7	4.1	380	5.7	2.0	21.7
Moderate	8	20.5	17.8	1,356	15.2	11.2	10	32.3	14.7	2,203	32.8	8.6	16.0
Middle	7	17.9	18.9	1,698	19.1	14.8	7	22.6	19.3	1,276	19.0	14.6	21.3
Upper	12	30.8	42.0	3,360	37.7	58.3	6	19.4	40.2	2,245	33.5	55.5	41.0
Unknown	7	17.9	15.8	1,772	19.9	13.3	5	16.1	21.7	604	9.0	19.2	0.0
<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>8,902</b>	<b>100.0</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>6,708</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	4.4	2.8	268	2.7	1.3	3	7.3	3.2	361	4.3	1.5	21.7
Moderate	10	22.2	10.5	1,281	13.0	6.7	8	19.5	14.2	994	11.8	9.0	16.0
Middle	13	28.9	19.0	2,283	23.1	15.1	14	34.1	18.6	2,823	33.4	14.0	21.3
Upper	19	42.2	45.6	5,874	59.4	54.3	14	34.1	44.3	3,827	45.3	55.8	41.0
Unknown	1	2.2	22.1	182	1.8	22.6	2	4.9	19.7	441	5.2	19.7	0.0
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>9,888</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>8,446</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	13.3	7.7	55	4.9	2.4	0	0.0	2.9	0	0.0	2.3	21.7
Moderate	5	33.3	18.3	505	45.3	11.5	2	25.0	8.7	125	16.6	4.2	16.0
Middle	3	20.0	20.2	115	10.3	17.8	1	12.5	17.3	50	6.7	10.1	21.3
Upper	5	33.3	52.9	439	39.4	67.3	5	62.5	63.5	576	76.7	76.0	41.0
Unknown	0	0.0	1.0	0	0.0	0.9	0	0.0	7.7	0	0.0	7.4	0.0
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>1,114</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>751</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	9	8.5	4.0	1,039	5.0	1.8	6	7.1	3.6	741	4.4	1.7	21.7
Moderate	23	21.7	13.5	3,142	15.2	8.6	20	23.8	14.2	3,322	19.9	8.7	16.0
Middle	23	21.7	18.4	4,096	19.8	14.6	22	26.2	18.7	4,149	24.8	14.1	21.3
Upper	36	34.0	43.3	9,673	46.7	55.8	25	29.8	42.8	6,648	39.8	55.6	41.0
Unknown	15	14.2	20.7	2,743	13.3	19.3	11	13.1	20.7	1,862	11.1	19.9	0.0
<b>Total</b>	<b>106</b>	<b>100.0</b>	<b>100.0</b>	<b>20,693</b>	<b>100.0</b>	<b>100.0</b>	<b>84</b>	<b>100.0</b>	<b>100.0</b>	<b>16,722</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA Maryland (Group A)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	41	77.4	43.6	1,121	21.4	42.2	90.5
Over \$1 Million	10	18.9		4,006	76.6		8.0
Revenue Unknown	2	3.8		100	1.9		1.5
<b>Total</b>	<b>53</b>	<b>100.0</b>		<b>5,227</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	46	86.8	93.7	850	16.3	37.2	
\$100,001 - \$250,000	1	1.9	3.2	250	4.8	16.1	
\$250,001 - \$1 Million	6	11.3	3.1	4,127	79.0	46.6	
<b>Total</b>	<b>53</b>	<b>100.0</b>	<b>100.0</b>	<b>5,227</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	40	97.6		621	55.4		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	1	2.4		500	44.6		
<b>Total</b>	<b>41</b>	<b>100.0</b>		<b>1,121</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA Maryland (Group A)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	39	39.4	30.0	2,069	26.0	23.8	46	49.5	54.1	1,242	24.0	35.8	90.1
Over \$1 Million	23	23.2		4,436	55.8		13	14.0		2,091	40.5		8.3
Revenue Unknown	37	37.4		1,444	18.2		34	36.6		1,835	35.5		1.6
<b>Total</b>	<b>99</b>	<b>100.0</b>		<b>7,949</b>	<b>100.0</b>		<b>93</b>	<b>100.0</b>		<b>5,168</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	80	80.8	86.4	2,094	26.3	28.8	80	86.0	89.4	2,005	38.8	29.9	
\$100,001 - \$250,000	6	6.1	7.5	993	12.5	19.9	7	7.5	5.7	1,083	21.0	19.5	
\$250,001 - \$1 Million	13	13.1	6.1	4,862	61.2	51.3	6	6.5	4.9	2,080	40.2	50.6	
<b>Total</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>7,949</b>	<b>100.0</b>	<b>100.0</b>	<b>93</b>	<b>100.0</b>	<b>100.0</b>	<b>5,168</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	36	92.3		700	33.8		45	97.8		1,117	89.9		
\$100,001 - \$250,000	0	0.0		0	0.0		1	2.2		125	10.1		
\$250,001 - \$1 Million	3	7.7		1,369	66.2		0	0.0		0	0.0		
<b>Total</b>	<b>39</b>	<b>100.0</b>		<b>2,069</b>	<b>100.0</b>		<b>46</b>	<b>100.0</b>		<b>1,242</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Non-MSA Maryland (Group B)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.3	0	0.0	1.6	12.1
Middle	7	100.0	96.7	2,647	100.0	98.4	87.9
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>2,647</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	6.0	0	0.0	3.9	12.1
Middle	19	100.0	94.0	1,894	100.0	96.1	87.9
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>1,894</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.8	0	0.0	1.3	12.1
Middle	9	100.0	96.2	533	100.0	98.7	87.9
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>533</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	1.2
Middle	0	0.0	100.0	0	0.0	100.0	98.8
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.3	0	0.0	2.4	12.1
Middle	35	100.0	95.7	5,074	100.0	97.6	87.9
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>35</b>	<b>100.0</b>	<b>100.0</b>	<b>5,074</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography														
Assessment Area: Non-MSA Maryland (Group B)														
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %		
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%	
<b>Home Purchase Loans</b>														
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	3.9	0	0.0	1.6	0	0.0	2.8	0	0.0	1.6	12.1	
Middle	6	100.0	96.1	919	100.0	98.4	7	100.0	97.2	1,822	100.0	98.4	87.9	
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>919</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,822</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
<b>Refinance Loans</b>														
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	2	10.5	4.4	261	4.9	2.4	4	18.2	4.2	411	15.0	2.5	12.1	
Middle	17	89.5	95.4	5,108	95.1	97.6	18	81.8	95.8	2,324	85.0	97.5	87.9	
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Unknown	0	0.0	0.1	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		
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>5,369</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,735</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
<b>Home Improvement Loans</b>														
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	2.6	0	0.0	0.8	4	22.2	9.1	154	10.9	2.8	12.1	
Middle	7	100.0	97.4	702	100.0	99.2	14	77.8	90.9	1,262	89.1	97.2	87.9	
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>702</b>	<b>100.0</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>1,416</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>		
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	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0		0.0	1.2
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0		100.0	98.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0		0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0		0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0		0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>		<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0		0.0	0.0
Moderate	2	6.1	4.2	261	3.6	2.0	8	17.0	3.8	565	9.5		2.0	12.1
Middle	31	93.9	95.7	7,069	96.4	98.0	39	83.0	96.2	5,408	90.5		98.0	87.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0		0.0	0.0
Unknown	0	0.0	0.1	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	
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>7,330</b>	<b>100.0</b>	<b>100.0</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>5,973</b>	<b>100.0</b>		<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Non-MSA Maryland (Group B)							
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	3.7	0	0.0	1.6	5.9
Middle	34	100.0	94.4	1,511	100.0	97.7	94.1
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.9	0	0.0	0.7	
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>1,511</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: Non-MSA Maryland (Group B)														
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %	
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	0.0
Moderate	5	5.9	3.0	686	12.8	2.4	6	8.6	4.3	644	13.3	2.9	5.7	5.7
Middle	80	94.1	96.3	4,672	87.2	97.4	64	91.4	94.9	4,212	86.7	97.0	94.3	94.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.2	0	0.0	0.8	0	0.0	0.2		
<b>Total</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>5,358</b>	<b>100.0</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>4,856</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Non-MSA Maryland (Group B)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	14.3	6.0	131	4.9	2.2	21.5
<b>Moderate</b>	0	0.0	10.4	0	0.0	5.4	24.0
<b>Middle</b>	1	14.3	12.7	92	3.5	7.2	20.3
<b>Upper</b>	5	71.4	51.5	2,424	91.6	68.3	34.2
<b>Unknown</b>	0	0.0	19.4	0	0.0	17.0	0.0
<b>Total</b>	7	100.0	100.0	2,647	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	2	10.5	3.8	100	5.3	1.3	21.5
<b>Moderate</b>	4	21.1	13.9	400	21.1	7.1	24.0
<b>Middle</b>	6	31.6	14.9	589	31.1	8.9	20.3
<b>Upper</b>	6	31.6	52.3	695	36.7	66.9	34.2
<b>Unknown</b>	1	5.3	15.1	110	5.8	15.9	0.0
<b>Total</b>	19	100.0	100.0	1,894	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	21.5
<b>Moderate</b>	3	33.3	15.4	145	27.2	7.3	24.0
<b>Middle</b>	2	22.2	26.9	135	25.3	38.1	20.3
<b>Upper</b>	4	44.4	53.8	253	47.5	53.3	34.2
<b>Unknown</b>	0	0.0	3.8	0	0.0	1.3	0.0
<b>Total</b>	9	100.0	100.0	533	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	3	8.6	5.2	231	4.6	1.9	21.5
<b>Moderate</b>	7	20.0	11.7	545	10.7	5.9	24.0
<b>Middle</b>	9	25.7	13.6	816	16.1	7.9	20.3
<b>Upper</b>	15	42.9	51.7	3,372	66.5	67.2	34.2
<b>Unknown</b>	1	2.9	17.7	110	2.2	17.0	0.0
<b>Total</b>	35	100.0	100.0	5,074	100.0	100.0	100.0



Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA Maryland (Group B)													
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)	\$%		\$%
<b>Home Purchase Loans</b>													
Low	0	0.0	3.2	0	0.0	1.1	1	14.3	2.9	76	4.2	0.9	21.5
Moderate	2	33.3	7.9	245	26.7	3.4	3	42.9	8.2	416	22.8	3.6	24.0
Middle	1	16.7	11.6	67	7.3	6.6	0	0.0	9.0	0	0.0	4.7	20.3
Upper	2	33.3	57.0	387	42.1	72.3	3	42.9	58.9	1,330	73.0	72.7	34.2
Unknown	1	16.7	20.2	220	23.9	16.7	0	0.0	20.9	0	0.0	18.1	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>919</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,822</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	10.5	3.4	115	2.1	1.1	1	4.5	3.5	50	1.8	1.3	21.5
Moderate	4	21.1	7.0	445	8.3	3.5	8	36.4	9.1	762	27.9	4.0	24.0
Middle	2	10.5	11.6	396	7.4	7.9	7	31.8	12.7	961	35.1	7.7	20.3
Upper	10	52.6	59.8	4,180	77.9	71.6	6	27.3	56.4	962	35.2	70.4	34.2
Unknown	1	5.3	18.1	233	4.3	15.9	0	0.0	18.4	0	0.0	16.6	0.0
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>5,369</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,735</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.6	0	0.0	1.6	1	5.6	2.3	40	2.8	0.7	21.5
Moderate	3	42.9	21.1	165	23.5	6.8	6	33.3	18.2	282	19.9	7.5	24.0
Middle	3	42.9	15.8	287	40.9	10.3	1	5.6	11.4	90	6.4	9.7	20.3
Upper	1	14.3	50.0	250	35.6	67.2	10	55.6	63.6	1,004	70.9	79.0	34.2
Unknown	0	0.0	10.5	0	0.0	14.2	0	0.0	4.5	0	0.0	3.1	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>702</b>	<b>100.0</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>1,416</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	2	6.1	3.2	115	1.6	1.1	3	6.4	3.2	166	2.8	1.1	21.5
Moderate	9	27.3	7.7	855	11.7	3.4	17	36.2	9.0	1,460	24.4	3.8	24.0
Middle	6	18.2	11.6	750	10.2	7.1	8	17.0	11.0	1,051	17.6	6.1	20.3
Upper	13	39.4	57.8	4,817	65.7	71.7	19	40.4	57.3	3,296	55.2	71.6	34.2
Unknown	3	9.1	19.7	793	10.8	16.7	0	0.0	19.4	0	0.0	17.4	0.0
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>7,330</b>	<b>100.0</b>	<b>100.0</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>5,973</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Non-MSA Maryland (Group B)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	31	91.2	43.8	976	64.6	39.2	89.1
Over \$1 Million	3	8.8		535	35.4		9.3
Revenue Unknown	0	0.0		0	0.0		1.6
<b>Total</b>	<b>34</b>	<b>100.0</b>		<b>1,511</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	31	91.2	90.7	689	45.6	35.0	
\$100,001 - \$250,000	2	5.9	5.9	322	21.3	23.5	
\$250,001 - \$1 Million	1	2.9	3.4	500	33.1	41.6	
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>1,511</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	29	93.5		654	67.0		
\$100,001 - \$250,000	2	6.5		322	33.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>31</b>	<b>100.0</b>		<b>976</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Non-MSA Maryland (Group B)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	48	56.5	26.7	1,943	36.3	21.9	35	50.0	38.8	1,075	22.1	24.6	90.1
Over \$1 Million	17	20.0		2,069	38.6		13	18.6		2,696	55.5		8.4
Revenue Unknown	20	23.5		1,346	25.1		22	31.4		1,085	22.3		1.5
<b>Total</b>	<b>85</b>	<b>100.0</b>		<b>5,358</b>	<b>100.0</b>		<b>70</b>	<b>100.0</b>		<b>4,856</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	72	84.7	84.5	2,449	45.7	31.8	59	84.3	89.8	1,748	36.0	35.0	
\$100,001 - \$250,000	9	10.6	10.7	1,101	20.5	26.9	6	8.6	6.9	810	16.7	25.2	
\$250,001 - \$1 Million	4	4.7	4.9	1,808	33.7	41.2	5	7.1	3.3	2,298	47.3	39.7	
<b>Total</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>5,358</b>	<b>100.0</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>4,856</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	45	93.8		1,377	70.9		34	97.1		950	88.4		
\$100,001 - \$250,000	2	4.2		206	10.6		1	2.9		125	11.6		
\$250,001 - \$1 Million	1	2.1		360	18.5		0	0.0		0	0.0		
<b>Total</b>	<b>48</b>	<b>100.0</b>		<b>1,943</b>	<b>100.0</b>		<b>35</b>	<b>100.0</b>		<b>1,075</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 48424 (WPalmB-BocaRaton-BoyntonB, FL)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.9	0	0.0	1.7	3.1
Moderate	3	17.6	23.7	436	5.9	15.8	23.3
Middle	6	35.3	35.2	1,989	26.9	30.3	32.7
Upper	8	47.1	38.0	4,968	67.2	51.4	40.6
Unknown	0	0.0	0.2	0	0.0	0.7	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>7,393</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.6	0	0.0	1.0	3.1
Moderate	1	5.6	17.2	201	1.0	11.1	23.3
Middle	5	27.8	35.6	776	4.0	27.3	32.7
Upper	12	66.7	45.3	18,356	94.9	59.1	40.6
Unknown	0	0.0	0.2	0	0.0	1.5	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>19,333</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.1	0	0.0	0.7	3.1
Moderate	0	0.0	14.3	0	0.0	8.3	23.3
Middle	0	0.0	33.2	0	0.0	23.9	32.7
Upper	4	100.0	51.2	5,025	100.0	60.8	40.6
Unknown	0	0.0	0.2	0	0.0	6.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>5,025</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	1	25.0	20.2	22,920	11.8	11.1	6.5
Moderate	1	25.0	46.2	15,170	7.8	40.2	35.2
Middle	0	0.0	22.1	0	0.0	22.6	27.5
Upper	2	50.0	11.5	155,846	80.4	26.1	30.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>193,936</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	1	1.9	2.4	22,920	10.1	2.0	3.1
Moderate	8	14.8	21.0	16,245	7.1	15.3	23.3
Middle	15	27.8	34.9	3,688	1.6	28.3	32.7
Upper	30	55.6	41.5	185,182	81.2	53.4	40.6
Unknown	0	0.0	0.2	0	0.0	1.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>228,035</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 48424 (WPalmB-BocaRaton-BoyntonB, FL)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.4	0	0.0	1.7	0	0.0	3.1	0	0.0	1.7	3.1
Moderate	7	19.4	22.5	3,552	13.4	14.8	1	3.7	23.7	75	0.4	14.4	23.3
Middle	10	27.8	34.1	3,461	13.0	28.6	8	29.6	34.1	5,462	32.7	27.5	32.7
Upper	18	50.0	39.8	12,309	46.4	53.7	18	66.7	38.9	11,180	66.9	54.3	40.6
Unknown	1	2.8	0.2	7,200	27.1	1.2	0	0.0	0.2	0	0.0	2.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>26,522</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>16,717</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	3.6	1.4	121	0.6	0.9	1	2.7	1.7	121	0.6	1.0	3.1
Moderate	1	3.6	14.8	123	0.6	10.7	4	10.8	16.6	726	3.8	11.3	23.3
Middle	6	21.4	34.4	1,381	7.1	29.0	14	37.8	34.9	3,465	18.2	28.4	32.7
Upper	20	71.4	49.3	17,865	91.7	58.1	17	45.9	46.6	13,036	68.4	58.2	40.6
Unknown	0	0.0	0.1	0	0.0	1.4	1	2.7	0.1	1,724	9.0	1.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>19,490</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>19,072</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.2	0	0.0	0.7	0	0.0	1.3	0	0.0	0.7	3.1
Moderate	0	0.0	13.0	0	0.0	7.4	0	0.0	12.5	0	0.0	8.8	23.3
Middle	1	33.3	30.9	91	6.3	22.2	4	50.0	30.0	660	50.2	22.4	32.7
Upper	2	66.7	54.9	1,350	93.7	69.5	4	50.0	56.0	655	49.8	67.1	40.6
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	1.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,441</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,315</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	21.7	0	0.0	9.8	1	50.0	20.2	28,185	60.8	10.2	
Moderate	0	0.0	45.0	0	0.0	48.2	1	50.0	44.0	18,166	39.2	31.5	35.2
Middle	0	0.0	20.0	0	0.0	37.6	0	0.0	20.2	0	0.0	33.6	27.5
Upper	0	0.0	11.7	0	0.0	4.3	0	0.0	14.3	0	0.0	24.6	30.5
Unknown	0	0.0	1.7	0	0.0	0.1	0	0.0	1.2	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>46,351</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	4	3.5	2.3	827	1.4	1.4	3	3.6	2.4	28,516	33.5	1.6	
Moderate	17	15.0	18.3	5,101	8.8	13.0	8	9.6	19.5	19,309	22.7	12.8	23.3
Middle	33	29.2	34.0	8,718	15.0	28.1	28	33.7	34.1	9,873	11.6	26.9	32.7
Upper	57	50.4	45.2	36,146	62.1	55.4	43	51.8	43.8	25,670	30.2	56.6	40.6
Unknown	2	1.8	0.2	7,376	12.7	2.1	1	1.2	0.2	1,724	2.0	2.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>113</b>	<b>100.0</b>	<b>100.0</b>	<b>58,168</b>	<b>100.0</b>	<b>100.0</b>	<b>83</b>	<b>100.0</b>	<b>100.0</b>	<b>85,092</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 48424 (WPalmB-BocaRaton-BoyntonB, FL)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	5.6	0	0.0	7.0	5.4
Moderate	8	72.7	21.9	4,055	80.5	21.3	20.9
Middle	1	9.1	28.2	600	11.9	25.9	30.1
Upper	2	18.2	43.3	385	7.6	44.5	43.0
Unknown	0	0.0	0.5	0	0.0	0.8	0.7
Tract-Unk	0	0.0	0.5	0	0.0	0.4	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>5,040</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 48424 (WPalmB-BocaRaton-BoyntonB, FL)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	2	6.1	5.9	499	5.9	7.8	1	5.0	5.8	644	11.7	7.4	5.5
Moderate	16	48.5	21.7	4,135	49.1	22.7	7	35.0	23.3	1,896	34.4	23.6	21.2
Middle	6	18.2	28.5	2,455	29.2	26.2	4	20.0	29.3	1,010	18.3	27.1	30.2
Upper	9	27.3	43.1	1,328	15.8	42.3	8	40.0	40.8	1,959	35.6	41.0	42.5
Unknown	0	0.0	0.6	0	0.0	0.8	0	0.0	0.5	0	0.0	0.8	0.7
Tract-Unk	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>8,417</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>5,509</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 48424 (WPalmB-BocaRaton-BoyntonB, FL)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	1	5.9	4.0	186	2.5	1.8	22.8
Moderate	0	0.0	16.8	0	0.0	10.0	17.3
Middle	1	5.9	20.9	172	2.3	16.3	17.8
Upper	12	70.6	44.5	5,452	73.7	57.8	42.1
Unknown	3	17.6	13.9	1,583	21.4	14.1	0.0
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>7,393</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	4.4	0	0.0	2.0	22.8
Moderate	3	16.7	13.0	501	2.6	7.1	17.3
Middle	3	16.7	19.4	476	2.5	13.2	17.8
Upper	11	61.1	45.2	14,356	74.3	57.9	42.1
Unknown	1	5.6	18.0	4,000	20.7	19.9	0.0
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>19,333</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	4.7	0	0.0	2.5	22.8
Moderate	0	0.0	12.5	0	0.0	6.8	17.3
Middle	0	0.0	20.9	0	0.0	13.4	17.8
Upper	3	75.0	58.1	2,055	40.9	62.7	42.1
Unknown	1	25.0	3.8	2,970	59.1	14.7	0.0
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>5,025</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	1	2.0	4.2	186	0.5	1.9	22.8
Moderate	3	6.0	15.1	501	1.5	8.7	17.3
Middle	4	8.0	20.0	648	1.9	14.8	17.8
Upper	26	52.0	45.4	21,863	64.1	58.2	42.1
Unknown	16	32.0	15.3	10,901	32.0	16.4	0.0
<b>Total</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>34,099</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 48424 (WPalmB-BocaRaton-BoyntonB, FL)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.8	0	0.0	1.6	0	0.0	3.5	0	0.0	1.2	22.8
Moderate	0	0.0	17.7	0	0.0	10.5	1	3.7	14.3	116	0.7	7.5	17.3
Middle	3	8.3	20.5	744	2.8	15.9	2	7.4	18.5	725	4.3	12.7	17.8
Upper	27	75.0	46.2	15,549	58.6	60.5	18	66.7	49.1	10,756	64.3	62.9	42.1
Unknown	6	16.7	11.8	10,229	38.6	11.5	6	22.2	14.6	5,120	30.6	15.6	0.0
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>26,522</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>16,717</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.8	0	0.0	1.2	2	5.4	3.9	282	1.5	1.9	22.8
Moderate	2	7.1	11.8	432	2.2	6.9	5	13.5	13.4	811	4.3	7.7	17.3
Middle	3	10.7	18.9	548	2.8	14.3	5	13.5	19.7	1,298	6.8	14.6	17.8
Upper	20	71.4	49.0	14,645	75.1	59.8	22	59.5	46.0	15,650	82.1	58.6	42.1
Unknown	3	10.7	17.5	3,865	19.8	17.8	3	8.1	17.0	1,031	5.4	17.2	0.0
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>19,490</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>19,072</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.4	0	0.0	2.0	0	0.0	4.0	0	0.0	2.5	22.8
Moderate	0	0.0	13.3	0	0.0	6.7	1	12.5	9.3	50	3.8	4.9	17.3
Middle	0	0.0	18.6	0	0.0	11.8	1	12.5	15.9	50	3.8	10.2	17.8
Upper	2	66.7	59.6	691	48.0	71.3	6	75.0	66.3	1,215	92.4	75.4	42.1
Unknown	1	33.3	4.2	750	52.0	8.3	0	0.0	4.6	0	0.0	7.0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,441</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,315</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	3.3	0	0.0	1.4	2	2.5	3.7	282	0.7	1.5	22.8
Moderate	2	1.8	14.2	432	0.7	8.3	7	8.6	13.5	977	2.5	7.1	17.3
Middle	6	5.3	19.2	1,292	2.2	14.4	8	9.9	18.8	2,073	5.4	12.7	17.8
Upper	49	43.4	47.5	30,885	53.1	59.8	46	56.8	48.4	27,621	71.3	61.5	42.1
Unknown	56	49.6	15.8	25,559	43.9	16.2	18	22.2	15.6	7,788	20.1	17.1	0.0
<b>Total</b>	<b>113</b>	<b>100.0</b>	<b>100.0</b>	<b>58,168</b>	<b>100.0</b>	<b>100.0</b>	<b>81</b>	<b>100.0</b>	<b>100.0</b>	<b>38,741</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 48424 (WPalmB-BocaRaton-BoyntonB, FL)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	6	54.5	47.1	2,985	59.2	31.3	93.6
Over \$1 Million	4	36.4		2,030	40.3		5.3
Revenue Unknown	1	9.1		25	0.5		1.1
<b>Total</b>	<b>11</b>	<b>100.0</b>		<b>5,040</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	2	18.2	96.1	55	1.1	52.3	
\$100,001 - \$250,000	0	0.0	2.3	0	0.0	15.1	
\$250,001 - \$1 Million	9	81.8	1.6	4,985	98.9	32.6	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>5,040</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	6	100.0		2,985	100.0		
<b>Total</b>	<b>6</b>	<b>100.0</b>		<b>2,985</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 48424 (WPalmB-BocaRaton-BoyntonB, FL)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	\$(000)	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	11	33.3	41.9	2,104	25.0	25.4	3	15.0	43.6	169	3.1	25.0	94.0
Over \$1 Million	16	48.5		5,693	67.6		10	50.0		2,822	51.2		4.8
Revenue Unknown	6	18.2		620	7.4		7	35.0		2,518	45.7		1.2
<b>Total</b>	<b>33</b>	<b>100.0</b>		<b>8,417</b>	<b>100.0</b>		<b>20</b>	<b>100.0</b>		<b>5,509</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	15	45.5	91.0	576	6.8	40.5	8	40.0	94.2	257	4.7	45.6	
\$100,001 - \$250,000	3	9.1	5.6	596	7.1	21.1	2	10.0	3.6	269	4.9	18.9	
\$250,001 - \$1 Million	15	45.5	3.4	7,245	86.1	38.4	10	50.0	2.1	4,983	90.5	35.5	
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>8,417</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>5,509</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	8	72.7		238	11.3		2	66.7		25	14.8		
\$100,001 - \$250,000	0	0.0		0	0.0		1	33.3		144	85.2		
\$250,001 - \$1 Million	3	27.3		1,866	88.7		0	0.0		0	0.0		
<b>Total</b>	<b>11</b>	<b>100.0</b>		<b>2,104</b>	<b>100.0</b>		<b>3</b>	<b>100.0</b>		<b>169</b>	<b>100.0</b>		



Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 38940 (Port St. Lucie, FL)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.9	0	0.0	3.8	7.0
Middle	0	0.0	30.5	0	0.0	23.2	36.2
Upper	5	100.0	63.6	2,365	100.0	73.0	56.8
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	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>2,365</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.8	0	0.0	2.4	7.0
Middle	1	100.0	33.7	100	100.0	27.9	36.2
Upper	0	0.0	62.5	0	0.0	69.7	56.8
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.2	0	0.0	1.7	7.0
Middle	0	0.0	26.8	0	0.0	20.1	36.2
Upper	0	0.0	71.0	0	0.0	78.2	56.8
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.7	0	0.0	1.3	10.5
Middle	0	0.0	66.7	0	0.0	97.2	43.3
Upper	0	0.0	16.7	0	0.0	1.5	46.1
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.8	0	0.0	3.1	7.0
Middle	1	16.7	31.2	100	4.1	25.6	36.2
Upper	5	83.3	64.0	2,365	95.9	71.3	56.8
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	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>2,465</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 38940 (Port St. Lucie, FL)													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
<b>Home Purchase Loans</b>													
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	4.9	0	0.0	3.2	0	0.0	8.1	0	0.0	4.8	7.0
Middle	1	33.3	34.7	182	17.1	27.0	2	50.0	35.0	311	30.4	27.5	36.2
Upper	2	66.7	60.4	880	82.9	69.9	2	50.0	57.0	711	69.6	67.7	56.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,062</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,022</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
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	2.9	0	0.0	1.9	0	0.0	4.0	0	0.0	2.4	7.0
Middle	0	0.0	28.2	0	0.0	22.8	3	60.0	30.3	392	43.6	23.6	36.2
Upper	1	100.0	68.9	334	100.0	75.3	2	40.0	65.6	508	56.4	74.0	56.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>334</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>900</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	2.7	0	0.0	2.3	0	0.0	1.8	0	0.0	1.4	7.0
Middle	1	50.0	30.1	150	42.9	23.0	0	0.0	31.3	0	0.0	28.5	36.2
Upper	1	50.0	67.2	200	57.1	74.8	1	100.0	67.0	100	100.0	70.1	56.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>350</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
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	60.0	0	0.0	96.1	10.5
Middle	0	0.0	66.7	0	0.0	62.2	0	0.0	40.0	0	0.0	3.9	43.3
Upper	0	0.0	33.3	0	0.0	37.8	0	0.0	0.0	0	0.0	0.0	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
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	3.8	0	0.0	2.5	0	0.0	5.6	0	0.0	4.6	7.0
Middle	4	50.0	30.9	707	33.3	24.6	5	50.0	32.2	703	34.8	24.8	36.2
Upper	4	50.0	65.3	1,414	66.7	72.9	5	50.0	62.2	1,319	65.2	70.6	56.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>2,121</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>2,022</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 38940 (Port St. Lucie, FL)							
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	18.1	0	0.0	20.9	16.0
Middle	0	0.0	31.1	0	0.0	32.2	35.4
Upper	2	100.0	49.6	1,600	100.0	46.3	48.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.1	0	0.0	0.6	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,600</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 38940 (Port St. Lucie, FL)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
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	18.7	0	0.0	23.4	0	0.0	16.7	0	0.0	20.3	16.6
Middle	0	0.0	33.1	0	0.0	35.9	0	0.0	32.3	0	0.0	34.1	34.9
Upper	0	0.0	47.9	0	0.0	40.5	0	0.0	50.6	0	0.0	45.6	48.4
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	0.3	0	0.0	0.2	0	0.0	0.5	0	0.0	0.1	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 38940 (Port St. Lucie, FL)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	1.5	0	0.0	0.5	14.3
<b>Moderate</b>	0	0.0	7.9	0	0.0	3.8	17.1
<b>Middle</b>	0	0.0	15.4	0	0.0	9.7	17.5
<b>Upper</b>	5	100.0	63.2	2,365	100.0	74.8	51.1
<b>Unknown</b>	0	0.0	12.0	0	0.0	11.2	0.0
<b>Total</b>	5	100.0	100.0	2,365	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	3.3	0	0.0	1.4	14.3
<b>Moderate</b>	0	0.0	9.1	0	0.0	4.9	17.1
<b>Middle</b>	0	0.0	15.6	0	0.0	10.2	17.5
<b>Upper</b>	1	100.0	57.2	100	100.0	67.2	51.1
<b>Unknown</b>	0	0.0	14.9	0	0.0	16.2	0.0
<b>Total</b>	1	100.0	100.0	100	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	1.6	0	0.0	0.6	14.3
<b>Moderate</b>	0	0.0	6.9	0	0.0	3.9	17.1
<b>Middle</b>	0	0.0	15.8	0	0.0	9.9	17.5
<b>Upper</b>	0	0.0	73.2	0	0.0	81.7	51.1
<b>Unknown</b>	0	0.0	2.4	0	0.0	3.9	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	0	0.0	2.1	0	0.0	0.8	14.3
<b>Moderate</b>	0	0.0	8.3	0	0.0	4.1	17.1
<b>Middle</b>	0	0.0	15.2	0	0.0	9.6	17.5
<b>Upper</b>	6	100.0	61.9	2,465	100.0	72.6	51.1
<b>Unknown</b>	0	0.0	12.5	0	0.0	12.9	0.0
<b>Total</b>	6	100.0	100.0	2,465	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 38940 (Port St. Lucie, FL)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	1.9	0	0.0	0.6	0	0.0	2.4	0	0.0	0.8	14.3
Moderate	1	33.3	11.7	182	17.1	6.1	0	0.0	11.0	0	0.0	5.4	17.1
Middle	0	0.0	17.4	0	0.0	12.0	0	0.0	16.5	0	0.0	10.9	17.5
Upper	2	66.7	57.9	880	82.9	69.7	3	75.0	57.2	841	82.3	69.8	51.1
Unknown	0	0.0	11.2	0	0.0	11.6	1	25.0	13.0	181	17.7	13.2	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,062</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,022</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.1	0	0.0	0.9	1	20.0	3.3	100	11.1	1.3	14.3
Moderate	0	0.0	8.0	0	0.0	4.4	0	0.0	10.7	0	0.0	5.9	17.1
Middle	0	0.0	16.2	0	0.0	11.2	3	60.0	18.0	583	64.8	12.5	17.5
Upper	1	100.0	56.4	334	100.0	63.9	1	20.0	51.4	217	24.1	61.6	51.1
Unknown	0	0.0	17.3	0	0.0	19.6	0	0.0	16.6	0	0.0	18.7	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>334</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>900</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.0	0	0.0	0.7	0	0.0	2.4	0	0.0	0.9	14.3
Moderate	0	0.0	10.6	0	0.0	5.6	0	0.0	9.4	0	0.0	6.1	17.1
Middle	0	0.0	19.2	0	0.0	13.2	0	0.0	15.3	0	0.0	9.7	17.5
Upper	2	100.0	65.6	350	100.0	78.6	1	100.0	70.5	100	100.0	78.1	51.1
Unknown	0	0.0	2.5	0	0.0	1.8	0	0.0	2.4	0	0.0	5.2	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>350</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	2.1	0	0.0	0.8	1	10.0	2.9	100	4.9	1.1	14.3
Moderate	1	12.5	9.6	182	8.6	5.1	0	0.0	10.7	0	0.0	5.5	17.1
Middle	0	0.0	16.7	0	0.0	11.4	3	30.0	17.0	583	28.8	11.3	17.5
Upper	5	62.5	57.2	1,564	73.7	66.6	5	50.0	55.2	1,158	57.3	66.7	51.1
Unknown	2	25.0	14.5	375	17.7	16.1	1	10.0	14.2	181	9.0	15.5	0.0
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>2,121</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>2,022</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 38940 (Port St. Lucie, FL)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	1	50.0	43.4	600	37.5	32.9	93.2
Over \$1 Million	1	50.0		1,000	62.5		5.6
Revenue Unknown	0	0.0		0	0.0		1.1
<b>Total</b>	<b>2</b>	<b>100.0</b>		<b>1,600</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	0	0.0	95.1	0	0.0	46.4	
\$100,001 - \$250,000	0	0.0	2.8	0	0.0	16.4	
\$250,001 - \$1 Million	2	100.0	2.1	1,600	100.0	37.2	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,600</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	1	100.0		600	100.0		
<b>Total</b>	<b>1</b>	<b>100.0</b>		<b>600</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 38940 (Port St. Lucie, FL)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	0	0.0	43.5	0	0.0	27.4	0	0.0	45.2	0	0.0	28.2	93.7
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		5.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.2
<b>Total</b>	<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	0	0.0	89.1	0	0.0	38.7	0	0.0	93.9	0	0.0	46.3	
\$100,001 - \$250,000	0	0.0	7.2	0	0.0	24.0	0	0.0	3.9	0	0.0	19.4	
\$250,001 - \$1 Million	0	0.0	3.7	0	0.0	37.3	0	0.0	2.2	0	0.0	34.2	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
<b>Total</b>	<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 42680 (Sebastian-Vero Beach, FL)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.6	0	0.0	0.4	1.4
Moderate	0	0.0	16.7	0	0.0	14.0	13.4
Middle	2	100.0	59.2	360	100.0	49.3	54.1
Upper	0	0.0	23.5	0	0.0	36.3	31.1
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	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>360</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.5	0	0.0	0.3	1.4
Moderate	0	0.0	11.3	0	0.0	8.6	13.4
Middle	1	33.3	61.9	393	20.8	49.2	54.1
Upper	2	66.7	26.3	1,494	79.2	42.0	31.1
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	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,887</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.6	0	0.0	0.8	1.4
Moderate	0	0.0	7.4	0	0.0	5.6	13.4
Middle	0	0.0	56.9	0	0.0	46.5	54.1
Upper	0	0.0	34.2	0	0.0	47.1	31.1
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	30.0	0	0.0	29.8	6.0
Moderate	0	0.0	60.0	0	0.0	66.8	13.8
Middle	0	0.0	10.0	0	0.0	3.5	37.6
Upper	0	0.0	0.0	0	0.0	0.0	42.7
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.7	0	0.0	1.1	1.4
Moderate	0	0.0	14.1	0	0.0	13.1	13.4
Middle	3	60.0	59.7	753	33.5	47.0	54.1
Upper	2	40.0	25.5	1,494	66.5	38.8	31.1
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	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>2,247</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 42680 (Sebastian-Vero Beach, FL)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.9	0	0.0	0.5	0	0.0	1.0	0	0.0	0.4	1.4
Moderate	0	0.0	13.3	0	0.0	10.3	0	0.0	13.4	0	0.0	10.5	13.4
Middle	1	100.0	58.3	117	100.0	46.4	1	20.0	59.5	218	9.8	45.3	54.1
Upper	0	0.0	27.5	0	0.0	42.7	4	80.0	26.1	2,008	90.2	43.7	31.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>117</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>2,226</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.5	0	0.0	0.3	1.4
Moderate	0	0.0	10.8	0	0.0	8.8	0	0.0	12.6	0	0.0	10.2	13.4
Middle	1	33.3	58.9	65	2.8	48.0	2	66.7	58.7	316	6.9	47.3	54.1
Upper	2	66.7	30.0	2,272	97.2	42.9	1	33.3	28.2	4,250	93.1	42.2	31.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>2,337</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>4,566</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.0	0	0.0	0.9	0	0.0	0.2	0	0.0	0.1	1.4
Moderate	0	0.0	12.3	0	0.0	9.5	0	0.0	11.2	0	0.0	8.4	13.4
Middle	0	0.0	58.2	0	0.0	42.5	0	0.0	55.4	0	0.0	41.0	54.1
Upper	1	100.0	28.4	1,500	100.0	47.0	1	100.0	33.3	250	100.0	50.5	31.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,500</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>250</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	40.0	0	0.0	56.6	0	0.0	10.0	0	0.0	4.6	
Moderate	0	0.0	40.0	0	0.0	41.7	0	0.0	30.0	0	0.0	18.1	13.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	20.0	0	0.0	5.8	37.6
Upper	0	0.0	20.0	0	0.0	1.6	0	0.0	40.0	0	0.0	71.4	42.7
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.7	0	0.0	1.1	0	0.0	0.7	0	0.0	0.4	
Moderate	0	0.0	12.0	0	0.0	9.9	0	0.0	12.8	0	0.0	10.1	13.4
Middle	2	40.0	58.3	182	4.6	45.7	3	33.3	58.6	534	7.6	44.7	54.1
Upper	3	60.0	29.0	3,772	95.4	43.3	6	66.7	27.9	6,508	92.4	44.8	31.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>3,954</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>7,042</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 42680 (Sebastian-Vero Beach, FL)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	5.9	0	0.0	6.7	5.5
Moderate	0	0.0	13.9	0	0.0	15.0	14.3
Middle	0	0.0	43.4	0	0.0	39.1	47.5
Upper	1	100.0	35.4	1,000	100.0	38.0	32.4
Unknown	0	0.0	0.3	0	0.0	0.4	0.2
Tract-Unk	0	0.0	1.1	0	0.0	0.8	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,000</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 42680 (Sebastian-Vero Beach, FL)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	7.7	0	0.0	10.3	0	0.0	7.0	0	0.0	9.7	5.8
Moderate	1	100.0	14.3	24	100.0	13.0	1	100.0	14.6	21	100.0	13.0	14.2
Middle	0	0.0	43.9	0	0.0	39.9	0	0.0	44.9	0	0.0	40.2	48.0
Upper	0	0.0	33.1	0	0.0	35.7	0	0.0	32.5	0	0.0	35.7	31.8
Unknown	0	0.0	0.5	0	0.0	0.8	0	0.0	0.3	0	0.0	1.2	0.2
Tract-Unk	0	0.0	0.4	0	0.0	0.4	0	0.0	0.7	0	0.0	0.1	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 42680 (Sebastian-Vero Beach, FL)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	4.7	0	0.0	2.4	20.6
<b>Moderate</b>	1	50.0	17.2	176	48.9	11.4	18.6
<b>Middle</b>	0	0.0	22.0	0	0.0	17.8	18.6
<b>Upper</b>	1	50.0	44.2	184	51.1	57.1	42.2
<b>Unknown</b>	0	0.0	11.8	0	0.0	11.2	0.0
<b>Total</b>	2	100.0	100.0	360	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	6.2	0	0.0	3.3	20.6
<b>Moderate</b>	0	0.0	15.0	0	0.0	9.1	18.6
<b>Middle</b>	0	0.0	20.1	0	0.0	14.7	18.6
<b>Upper</b>	2	66.7	36.4	1,535	81.3	49.4	42.2
<b>Unknown</b>	1	33.3	22.3	352	18.7	23.6	0.0
<b>Total</b>	3	100.0	100.0	1,887	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	6.9	0	0.0	5.2	20.6
<b>Moderate</b>	0	0.0	18.8	0	0.0	13.0	18.6
<b>Middle</b>	0	0.0	24.8	0	0.0	22.3	18.6
<b>Upper</b>	0	0.0	47.5	0	0.0	58.0	42.2
<b>Unknown</b>	0	0.0	2.0	0	0.0	1.4	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	0	0.0	5.2	0	0.0	2.7	20.6
<b>Moderate</b>	1	20.0	16.5	176	7.8	10.5	18.6
<b>Middle</b>	0	0.0	21.5	0	0.0	16.5	18.6
<b>Upper</b>	3	60.0	42.0	1,719	76.5	55.1	42.2
<b>Unknown</b>	1	20.0	14.8	352	15.7	15.1	0.0
<b>Total</b>	5	100.0	100.0	2,247	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 42680 (Sebastian-Vero Beach, FL)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	4.9	0	0.0	2.4	0	0.0	6.0	0	0.0	2.8	20.6
Moderate	0	0.0	20.7	0	0.0	14.1	0	0.0	20.0	0	0.0	12.7	18.6
Middle	1	100.0	21.1	117	100.0	16.9	0	0.0	21.2	0	0.0	16.1	18.6
Upper	0	0.0	42.7	0	0.0	55.5	3	60.0	40.0	1,366	61.4	56.2	42.2
Unknown	0	0.0	10.6	0	0.0	11.1	2	40.0	12.8	860	38.6	12.1	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>117</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>2,226</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	4.7	0	0.0	2.5	0	0.0	8.2	0	0.0	4.4	20.6
Moderate	0	0.0	14.3	0	0.0	9.0	2	66.7	19.7	316	6.9	13.5	18.6
Middle	0	0.0	18.7	0	0.0	14.5	0	0.0	19.5	0	0.0	16.0	18.6
Upper	2	66.7	39.0	2,272	97.2	50.7	1	33.3	32.3	4,250	93.1	45.9	42.2
Unknown	1	33.3	23.2	65	2.8	23.3	0	0.0	20.3	0	0.0	20.2	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>2,337</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>4,566</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	6.7	0	0.0	3.0	0	0.0	8.6	0	0.0	5.0	20.6
Moderate	0	0.0	17.1	0	0.0	10.6	0	0.0	19.2	0	0.0	9.7	18.6
Middle	0	0.0	22.5	0	0.0	17.8	0	0.0	23.4	0	0.0	16.4	18.6
Upper	1	100.0	50.7	1,500	100.0	66.5	1	100.0	47.4	250	100.0	66.2	42.2
Unknown	0	0.0	2.9	0	0.0	2.1	0	0.0	1.5	0	0.0	2.7	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,500</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>250</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	4.9	0	0.0	2.4	0	0.0	7.1	0	0.0	3.5	20.6
Moderate	0	0.0	17.3	0	0.0	11.4	2	22.2	19.7	316	4.5	12.7	18.6
Middle	1	20.0	19.8	117	3.0	15.4	0	0.0	20.3	0	0.0	15.6	18.6
Upper	3	60.0	41.4	3,772	95.4	53.9	5	55.6	37.0	5,866	83.3	52.5	42.2
Unknown	1	20.0	16.6	65	1.6	16.9	2	22.2	15.8	860	12.2	15.7	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>3,954</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>7,042</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 42680 (Sebastian-Vero Beach, FL)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	0	0.0	43.0	0	0.0	32.9	94.1
Over \$1 Million	1	100.0		1,000	100.0		5.2
Revenue Unknown	0	0.0		0	0.0		0.8
<b>Total</b>	<b>1</b>	<b>100.0</b>		<b>1,000</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	0	0.0	96.1	0	0.0	50.9	
\$100,001 - \$250,000	0	0.0	2.2	0	0.0	13.8	
\$250,001 - \$1 Million	1	100.0	1.7	1,000	100.0	35.3	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,000</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 42680 (Sebastian-Vero Beach, FL)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
<b>By Revenue</b>													
\$1 Million or Less	1	100.0	41.2	24	100.0	28.8	0	0.0	45.7	0	0.0	28.2	94.4
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		4.7
Revenue Unknown	0	0.0		0	0.0		1	100.0		21	100.0		0.8
<b>Total</b>	<b>1</b>	<b>100.0</b>		<b>24</b>	<b>100.0</b>		<b>1</b>	<b>100.0</b>		<b>21</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	1	100.0	91.1	24	100.0	42.7	1	100.0	95.1	21	100.0	50.9	
\$100,001 - \$250,000	0	0.0	5.6	0	0.0	20.3	0	0.0	3.3	0	0.0	18.9	
\$250,001 - \$1 Million	0	0.0	3.4	0	0.0	37.0	0	0.0	1.7	0	0.0	30.2	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	1	100.0		24	100.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
<b>Total</b>	<b>1</b>	<b>100.0</b>		<b>24</b>	<b>100.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 14460 (Boston-Cambridge-Newton, MA-NJ)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	4.5	0	0.0	4.4	3.8
Moderate	2	20.0	19.7	779	11.1	17.2	16.9
Middle	3	30.0	33.7	1,940	27.7	27.0	34.6
Upper	5	50.0	41.5	4,293	61.2	50.4	44.3
Unknown	0	0.0	0.6	0	0.0	0.9	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>7,012</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	1	8.3	4.3	615	15.0	4.3	3.8
Moderate	3	25.0	17.1	822	20.0	14.9	16.9
Middle	5	41.7	33.3	1,511	36.7	27.4	34.6
Upper	3	25.0	44.9	1,164	28.3	52.8	44.3
Unknown	0	0.0	0.4	0	0.0	0.6	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>4,112</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	3.7	0	0.0	4.8	3.8
Moderate	0	0.0	17.1	0	0.0	19.0	16.9
Middle	0	0.0	32.8	0	0.0	26.7	34.6
Upper	0	0.0	46.2	0	0.0	49.3	44.3
Unknown	0	0.0	0.2	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	16.0	0	0.0	9.9	13.6
Moderate	0	0.0	30.7	0	0.0	23.4	25.6
Middle	0	0.0	23.5	0	0.0	29.2	27.2
Upper	0	0.0	29.4	0	0.0	37.2	32.2
Unknown	0	0.0	0.4	0	0.0	0.2	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	1	3.6	4.4	615	4.9	4.8	3.8
Moderate	6	21.4	18.0	1,792	14.3	16.6	16.9
Middle	11	39.3	33.3	4,217	33.6	27.2	34.6
Upper	10	35.7	43.9	5,941	47.3	50.8	44.3
Unknown	0	0.0	0.5	0	0.0	0.7	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>12,565</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 14460 (Boston-Cambridge-Newton, MA-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%		\$%
<b>Home Purchase Loans</b>													
Low	0	0.0	9.0	0	0.0	7.2	1	25.0	10.9	1,756	37.1	10.2	9.8
Moderate	5	45.5	33.9	3,408	43.9	24.9	1	25.0	35.3	651	13.8	30.0	33.6
Middle	3	27.3	31.5	1,633	21.0	24.2	0	0.0	28.0	0	0.0	25.8	32.6
Upper	3	27.3	24.1	2,730	35.1	42.1	2	50.0	24.3	2,327	49.2	32.3	23.0
Unknown	0	0.0	1.5	0	0.0	1.5	0	0.0	1.5	0	0.0	1.7	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>7,771</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>4,734</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	9.2	0	0.0	8.8	2	14.3	10.4	1,057	10.1	10.0	9.8
Moderate	3	50.0	32.3	1,115	16.0	28.0	4	28.6	34.4	1,662	15.8	30.3	33.6
Middle	1	16.7	33.8	302	4.3	32.9	5	35.7	32.6	1,518	14.5	29.6	32.6
Upper	2	33.3	23.4	5,539	79.6	28.9	2	14.3	21.5	5,813	55.3	28.6	23.0
Unknown	0	0.0	1.2	0	0.0	1.5	1	7.1	1.1	453	4.3	1.4	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>6,956</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>10,503</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	11.1	0	0.0	11.5	0	0.0	11.8	0	0.0	11.5	9.8
Moderate	0	0.0	31.7	0	0.0	29.3	0	0.0	30.7	0	0.0	23.4	33.6
Middle	0	0.0	34.9	0	0.0	33.6	0	0.0	36.4	0	0.0	34.6	32.6
Upper	0	0.0	21.6	0	0.0	24.8	0	0.0	20.6	0	0.0	29.8	23.0
Unknown	0	0.0	0.7	0	0.0	0.7	0	0.0	0.5	0	0.0	0.6	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
Low	0	0.0	24.1	0	0.0	23.5	2	66.7	21.9	17,000	49.2		18.2
Moderate	0	0.0	40.3	0	0.0	37.0	1	33.3	40.2	17,578	50.8	37.9	30.6
Middle	0	0.0	18.0	0	0.0	24.3	0	0.0	20.6	0	0.0	27.5	19.3
Upper	0	0.0	16.8	0	0.0	14.7	0	0.0	16.2	0	0.0	15.8	28.0
Unknown	0	0.0	0.9	0	0.0	0.4	0	0.0	1.0	0	0.0	0.7	2.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>34,578</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
Low	6	17.6	9.4	1,902	9.2	9.7	6	26.1	10.7	20,369	40.2		10.8
Moderate	15	44.1	32.8	7,558	36.4	27.8	6	26.1	34.4	19,891	39.3	30.5	33.6
Middle	8	23.5	32.9	3,055	14.7	29.0	6	26.1	30.9	1,792	3.5	27.7	32.6
Upper	5	14.7	23.6	8,269	39.8	32.2	4	17.4	22.7	8,140	16.1	29.5	23.0
Unknown	0	0.0	1.3	0	0.0	1.4	1	4.3	1.2	453	0.9	1.4	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>20,784</b>	<b>100.0</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>50,645</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 14460 (Boston-Cambridge-Newton, MA-NJ)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	6.2	0	0.0	5.5	6.9
Moderate	1	33.3	16.9	750	41.1	14.3	15.2
Middle	0	0.0	27.9	0	0.0	27.1	25.0
Upper	2	66.7	47.3	1,075	58.9	51.5	51.8
Unknown	0	0.0	0.9	0	0.0	1.2	1.1
Tract-Unk	0	0.0	0.8	0	0.0	0.4	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,825</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 14460 (Boston-Cambridge-Newton, MA-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	12.7	0	0.0	10.2	0	0.0	13.4	0	0.0	10.1	13.5
Moderate	3	33.3	25.2	1,687	58.6	16.8	1	14.3	28.1	142	6.2	19.2	23.1
Middle	0	0.0	18.0	0	0.0	12.7	0	0.0	19.4	0	0.0	14.6	16.8
Upper	6	66.7	42.3	1,194	41.4	57.4	6	85.7	37.1	2,134	93.8	53.2	44.7
Unknown	0	0.0	1.8	0	0.0	2.9	0	0.0	1.9	0	0.0	3.0	1.9
Tract-Unk	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>2,881</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>2,276</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 14460 (Boston-Cambridge-Newton, MA-NJ)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	3.1	0	0.0	1.3	25.8
<b>Moderate</b>	1	10.0	15.2	359	5.1	9.0	15.4
<b>Middle</b>	2	20.0	21.0	971	13.8	16.2	17.6
<b>Upper</b>	6	60.0	47.7	5,032	71.8	58.3	41.2
<b>Unknown</b>	1	10.0	13.0	650	9.3	15.2	0.0
<b>Total</b>	10	100.0	100.0	7,012	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	1	8.3	3.7	172	4.2	1.7	25.8
<b>Moderate</b>	1	8.3	13.7	194	4.7	8.7	15.4
<b>Middle</b>	4	33.3	22.0	1,346	32.7	17.3	17.6
<b>Upper</b>	5	41.7	48.1	1,785	43.4	58.6	41.2
<b>Unknown</b>	1	8.3	12.5	615	15.0	13.5	0.0
<b>Total</b>	12	100.0	100.0	4,112	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	5.5	0	0.0	3.6	25.8
<b>Moderate</b>	0	0.0	14.8	0	0.0	10.4	15.4
<b>Middle</b>	0	0.0	24.3	0	0.0	18.2	17.6
<b>Upper</b>	0	0.0	50.9	0	0.0	55.5	41.2
<b>Unknown</b>	0	0.0	4.6	0	0.0	12.3	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	1	3.6	3.7	172	1.4	1.6	25.8
<b>Moderate</b>	2	7.1	14.3	553	4.4	8.8	15.4
<b>Middle</b>	6	21.4	21.5	2,317	18.4	16.5	17.6
<b>Upper</b>	11	39.3	47.7	6,817	54.3	58.0	41.2
<b>Unknown</b>	8	28.6	12.9	2,706	21.5	15.1	0.0
<b>Total</b>	28	100.0	100.0	12,565	100.0	100.0	100.0



Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 14460 (Boston-Cambridge-Newton, MA-NJ)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	2.0	0	0.0	0.7	0	0.0	2.2	0	0.0	1.0	38.1
Moderate	0	0.0	14.1	0	0.0	7.4	0	0.0	14.0	0	0.0	8.4	17.6
Middle	3	27.3	21.5	1,676	21.6	14.4	0	0.0	21.0	0	0.0	16.7	15.9
Upper	6	54.5	49.8	4,832	62.2	49.1	2	50.0	48.9	2,327	49.2	56.9	28.4
Unknown	2	18.2	12.6	1,263	16.3	28.4	2	50.0	13.9	2,407	50.8	17.0	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>7,771</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>4,734</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.9	0	0.0	1.4	0	0.0	5.0	0	0.0	2.5	38.1
Moderate	1	16.7	14.7	302	4.3	9.8	2	14.3	16.4	710	6.8	11.3	17.6
Middle	2	33.3	24.4	831	11.9	19.8	4	28.6	22.5	1,432	13.6	18.8	15.9
Upper	2	33.3	46.8	5,539	79.6	52.8	6	42.9	41.8	7,638	72.7	50.3	28.4
Unknown	1	16.7	11.3	284	4.1	16.0	2	14.3	14.2	723	6.9	17.1	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>6,956</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>10,503</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	7.5	0	0.0	4.6	0	0.0	6.4	0	0.0	4.7	38.1
Moderate	0	0.0	15.3	0	0.0	10.5	0	0.0	16.6	0	0.0	9.7	17.6
Middle	0	0.0	25.6	0	0.0	18.9	0	0.0	26.1	0	0.0	19.5	15.9
Upper	0	0.0	46.5	0	0.0	50.6	0	0.0	47.5	0	0.0	53.3	28.4
Unknown	0	0.0	5.1	0	0.0	15.5	0	0.0	3.5	0	0.0	12.8	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	2.8	0	0.0	1.2	0	0.0	4.1	0	0.0	1.9	38.1
Moderate	1	2.9	14.4	302	1.5	8.8	2	10.0	15.5	710	4.4	9.8	17.6
Middle	5	14.7	23.3	2,507	12.1	17.6	4	20.0	22.0	1,432	8.9	17.6	15.9
Upper	8	23.5	47.4	10,371	49.9	51.4	8	40.0	44.7	9,965	62.0	53.5	28.4
Unknown	20	58.8	12.1	7,604	36.6	21.0	6	30.0	13.7	3,960	24.6	17.2	0.0
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>20,784</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>16,067</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 14460 (Boston-Cambridge-Newton, MA-NJ)							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
\$1 Million or Less	1	33.3	40.0	150	8.2	28.8	89.0
Over \$1 Million	2	66.7		1,675	91.8		10.3
Revenue Unknown	0	0.0		0	0.0		0.7
<b>Total</b>	<b>3</b>	<b>100.0</b>		<b>1,825</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
\$100,000 or Less	0	0.0	94.7	0	0.0	42.5	
\$100,001 - \$250,000	1	33.3	2.9	150	8.2	15.7	
\$250,001 - \$1 Million	2	66.7	2.4	1,675	91.8	41.8	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,825</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	1	100.0		150	100.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
<b>Total</b>	<b>1</b>	<b>100.0</b>		<b>150</b>	<b>100.0</b>		

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 14460 (Boston-Cambridge-Newton, MA-NJ)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	1	11.1	34.8	40	1.4	18.7	1	14.3	40.8	975	42.8	20.8	87.8
Over \$1 Million	5	55.6		2,575	89.4		4	57.1		826	36.3		11.3
Revenue Unknown	3	33.3		266	9.2		2	28.6		475	20.9		0.9
<b>Total</b>	<b>9</b>	<b>100.0</b>		<b>2,881</b>	<b>100.0</b>		<b>7</b>	<b>100.0</b>		<b>2,276</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	3	33.3	84.9	151	5.2	26.7	1	14.3	90.0	12	0.5	31.8	
\$100,001 - \$250,000	2	22.2	8.3	296	10.3	20.7	3	42.9	5.6	540	23.7	19.3	
\$250,001 - \$1 Million	4	44.4	6.8	2,434	84.5	52.6	3	42.9	4.5	1,724	75.7	48.9	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>2,881</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>2,276</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	1	100.0		40	100.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	100.0		975	100.0		
<b>Total</b>	<b>1</b>	<b>100.0</b>		<b>40</b>	<b>100.0</b>		<b>1</b>	<b>100.0</b>		<b>975</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	14	15.1	6.4	2,962	8.5	3.3	5.1
Moderate	15	16.1	17.7	4,103	11.7	10.8	16.1
Middle	36	38.7	35.1	10,879	31.1	26.9	34.6
Upper	28	30.1	40.7	17,088	48.8	59.1	44.2
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	
<b>Total</b>	<b>93</b>	<b>100.0</b>	<b>100.0</b>	<b>35,032</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	1.9	3.1	326	0.5	1.3	5.1
Moderate	8	7.4	10.9	1,499	2.5	5.3	16.1
Middle	24	22.2	30.2	8,552	14.1	18.4	34.6
Upper	74	68.5	55.8	50,472	82.9	75.0	44.2
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	
<b>Total</b>	<b>108</b>	<b>100.0</b>	<b>100.0</b>	<b>60,849</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	2.0	0	0.0	1.7	5.1
Moderate	3	11.1	8.8	170	5.2	6.4	16.1
Middle	4	14.8	31.7	465	14.1	24.5	34.6
Upper	20	74.1	57.5	2,664	80.8	67.4	44.2
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	
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>3,299</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	33.6	0	0.0	24.5	24.0
Moderate	1	100.0	41.8	21,000	100.0	22.0	33.3
Middle	0	0.0	14.5	0	0.0	23.3	31.9
Upper	0	0.0	10.0	0	0.0	30.2	10.8
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>21,000</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	19	7.5	4.9	3,678	2.9	3.3	5.1
Moderate	38	14.9	14.5	29,009	22.9	8.6	16.1
Middle	74	29.0	32.7	22,906	18.1	22.6	34.6
Upper	124	48.6	47.9	71,001	56.1	65.4	44.2
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	
<b>Total</b>	<b>255</b>	<b>100.0</b>	<b>100.0</b>	<b>126,594</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	13	15.7	4.7	2,832	8.3	2.3	9	11.8	6.0	2,140	5.7	2.9	5.1
Moderate	18	21.7	16.0	5,175	15.2	8.7	11	14.5	19.2	2,834	7.6	10.2	16.1
Middle	25	30.1	33.1	7,997	23.5	23.9	28	36.8	32.5	10,461	28.1	22.8	34.6
Upper	27	32.5	46.2	18,034	53.0	65.1	28	36.8	42.3	21,787	58.5	64.2	44.2
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	
<b>Total</b>	<b>83</b>	<b>100.0</b>	<b>100.0</b>	<b>34,038</b>	<b>100.0</b>	<b>100.0</b>	<b>76</b>	<b>100.0</b>	<b>100.0</b>	<b>37,222</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.2	0	0.0	1.1	4	2.7	2.9	804	1.3	1.4	5.1
Moderate	17	10.3	10.1	6,353	6.9	5.9	14	9.3	12.2	3,172	5.2	6.7	16.1
Middle	50	30.3	33.5	15,526	16.9	23.5	46	30.7	32.9	13,037	21.4	22.6	34.6
Upper	98	59.4	54.2	69,817	76.1	69.5	86	57.3	52.0	43,916	72.1	69.3	44.2
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	
<b>Total</b>	<b>165</b>	<b>100.0</b>	<b>100.0</b>	<b>91,696</b>	<b>100.0</b>	<b>100.0</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>60,929</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	1	1.9	1.1	65	1.1	0.5	4	4.0	1.5	260	1.6	0.9	5.1
Moderate	2	3.7	8.4	68	1.2	5.2	4	4.0	6.5	271	1.7	3.8	16.1
Middle	14	25.9	31.1	1,212	20.7	25.1	28	28.3	27.7	3,225	19.7	20.6	34.6
Upper	37	68.5	59.4	4,496	77.0	69.2	63	63.6	64.3	12,641	77.1	74.7	44.2
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	
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>5,841</b>	<b>100.0</b>	<b>100.0</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>16,397</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	1	50.0	30.1	24,500	70.0	18.2	1	33.3	32.1	650	1.3	30.1	
Moderate	1	50.0	42.2	10,500	30.0	33.5	1	33.3	34.8	2,520	5.1	24.4	33.3
Middle	0	0.0	16.9	0	0.0	12.2	0	0.0	17.9	0	0.0	24.2	31.9
Upper	0	0.0	10.8	0	0.0	36.0	1	33.3	15.2	46,500	93.6	21.2	10.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>35,000</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>49,670</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	27	6.7	3.4	30,372	15.7	2.0	22	6.3	4.1	4,518	2.7	3.3	
Moderate	66	16.5	12.8	28,898	14.9	7.7	37	10.6	14.6	9,922	5.9	8.8	16.1
Middle	123	30.7	33.0	33,984	17.5	23.3	107	30.7	32.4	27,698	16.4	22.4	34.6
Upper	185	46.1	50.8	100,518	51.9	67.0	183	52.4	48.9	126,655	75.0	65.5	44.2
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	
<b>Total</b>	<b>401</b>	<b>100.0</b>	<b>100.0</b>	<b>193,772</b>	<b>100.0</b>	<b>100.0</b>	<b>349</b>	<b>100.0</b>	<b>100.0</b>	<b>168,793</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	17	13.6	9.4	3,572	28.9	11.7	8.9
Moderate	21	16.8	16.3	1,039	8.4	18.3	15.7
Middle	40	32.0	30.1	2,754	22.3	30.4	30.2
Upper	47	37.6	43.4	4,986	40.4	39.0	45.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.9	0	0.0	0.6	
<b>Total</b>	<b>125</b>	<b>100.0</b>	<b>100.0</b>	<b>12,351</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	35	11.5	9.6	4,967	14.7	11.8	36	9.9	9.8	4,625	11.2	11.8	9.3
Moderate	45	14.8	15.5	7,463	22.1	17.6	56	15.5	17.0	8,676	21.1	17.2	16.1
Middle	108	35.5	30.9	10,257	30.4	31.2	104	28.7	30.5	12,802	31.1	31.8	30.4
Upper	116	38.2	43.7	11,101	32.9	39.2	166	45.9	42.3	15,082	36.6	39.1	44.2
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	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>304</b>	<b>100.0</b>	<b>100.0</b>	<b>33,788</b>	<b>100.0</b>	<b>100.0</b>	<b>362</b>	<b>100.0</b>	<b>100.0</b>	<b>41,185</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	17	18.3	10.2	3,581	10.2	4.4	24.6
<b>Moderate</b>	26	28.0	23.3	6,764	19.3	14.4	15.6
<b>Middle</b>	21	22.6	18.8	7,725	22.1	15.0	17.8
<b>Upper</b>	25	26.9	37.1	16,516	47.1	55.4	42.0
<b>Unknown</b>	4	4.3	10.5	446	1.3	10.9	0.0
<b>Total</b>	93	100.0	100.0	35,032	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	7	6.5	6.3	1,470	2.4	2.3	24.6
<b>Moderate</b>	16	14.8	14.7	3,806	6.3	6.8	15.6
<b>Middle</b>	10	9.3	17.2	3,839	6.3	10.2	17.8
<b>Upper</b>	71	65.7	48.6	50,350	82.7	66.2	42.0
<b>Unknown</b>	4	3.7	13.1	1,384	2.3	14.6	0.0
<b>Total</b>	108	100.0	100.0	60,849	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	6.1	0	0.0	2.9	24.6
<b>Moderate</b>	4	14.8	13.5	247	7.5	8.5	15.6
<b>Middle</b>	6	22.2	20.4	440	13.3	13.8	17.8
<b>Upper</b>	17	63.0	56.6	2,612	79.2	70.1	42.0
<b>Unknown</b>	0	0.0	3.3	0	0.0	4.6	0.0
<b>Total</b>	27	100.0	100.0	3,299	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	24	9.4	8.2	5,051	4.8	3.3	24.6
<b>Moderate</b>	46	18.1	18.6	10,817	10.2	10.3	15.6
<b>Middle</b>	37	14.6	17.9	12,004	11.4	12.4	17.8
<b>Upper</b>	113	44.5	42.5	69,478	65.8	60.2	42.0
<b>Unknown</b>	34	13.4	12.9	8,244	7.8	13.8	0.0
<b>Total</b>	254	100.0	100.0	105,594	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	10	12.0	8.6	1,766	5.2	3.4	3	3.9	7.4	590	1.6	2.8	24.6
Moderate	19	22.9	21.5	4,871	14.3	12.3	18	23.7	22.0	4,792	12.9	11.9	15.6
Middle	18	21.7	19.1	6,176	18.1	14.0	16	21.1	18.5	6,062	16.3	12.7	17.8
Upper	26	31.3	41.9	18,166	53.4	61.2	32	42.1	40.7	23,668	63.6	62.0	42.0
Unknown	10	12.0	8.9	3,059	9.0	9.1	7	9.2	11.4	2,110	5.7	10.6	0.0
<b>Total</b>	<b>83</b>	<b>100.0</b>	<b>100.0</b>	<b>34,038</b>	<b>100.0</b>	<b>100.0</b>	<b>76</b>	<b>100.0</b>	<b>100.0</b>	<b>37,222</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	6	3.6	4.1	934	1.0	1.7	9	6.0	5.4	1,337	2.2	2.3	24.6
Moderate	19	11.5	13.8	4,436	4.8	7.8	26	17.3	15.6	5,978	9.8	8.5	15.6
Middle	27	16.4	20.3	10,714	11.7	14.1	37	24.7	20.1	11,338	18.6	13.6	17.8
Upper	104	63.0	50.5	68,742	75.0	64.8	72	48.0	46.8	39,798	65.3	63.5	42.0
Unknown	9	5.5	11.3	6,870	7.5	11.6	6	4.0	12.1	2,478	4.1	12.1	0.0
<b>Total</b>	<b>165</b>	<b>100.0</b>	<b>100.0</b>	<b>91,696</b>	<b>100.0</b>	<b>100.0</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>60,929</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	3	5.6	6.4	200	3.4	3.6	2	2.0	3.5	100	0.6	1.6	24.6
Moderate	7	13.0	13.3	317	5.4	8.5	12	12.1	9.7	1,148	7.0	5.7	15.6
Middle	6	11.1	16.9	512	8.8	13.3	23	23.2	17.4	2,468	15.1	11.6	17.8
Upper	35	64.8	60.7	4,362	74.7	71.7	57	57.6	65.9	9,713	59.2	74.5	42.0
Unknown	3	5.6	2.7	450	7.7	2.9	5	5.1	3.5	2,968	18.1	6.7	0.0
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>5,841</b>	<b>100.0</b>	<b>100.0</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>16,397</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	19	4.8	5.8	2,900	1.8	2.4	14	4.0	6.0	2,027	1.7	2.5	24.6
Moderate	45	11.3	16.4	9,624	6.1	9.5	56	16.2	17.5	11,918	10.0	9.8	15.6
Middle	51	12.8	19.2	17,402	11.0	13.6	76	22.0	19.1	19,868	16.7	12.9	17.8
Upper	165	41.4	46.6	91,270	57.5	62.7	161	46.5	45.4	73,179	61.4	63.0	42.0
Unknown	119	29.8	12.0	37,576	23.7	11.7	39	11.3	11.9	12,131	10.2	11.8	0.0
<b>Total</b>	<b>399</b>	<b>100.0</b>	<b>100.0</b>	<b>158,772</b>	<b>100.0</b>	<b>100.0</b>	<b>346</b>	<b>100.0</b>	<b>100.0</b>	<b>119,123</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
	Bank And Aggregate Loans						Total Businesses %						
	Bank		Agg	Bank		Agg							
	#	%	%	\$(000)	%	%							
<b>By Revenue</b>													
\$1 Million or Less	81	64.8	46.8	5,936	48.1	33.8	91.3						
Over \$1 Million	36	28.8		4,629	37.5		7.8						
Revenue Unknown	8	6.4		1,786	14.5		0.9						
<b>Total</b>	<b>125</b>	<b>100.0</b>		<b>12,351</b>	<b>100.0</b>		<b>100.0</b>						
<b>By Loan Size</b>													
\$100,000 or Less	98	78.4	95.7	3,626	29.4	48.4							
\$100,001 - \$250,000	12	9.6	2.4	2,171	17.6	14.7							
\$250,001 - \$1 Million	15	12.0	1.9	6,554	53.1	36.9							
<b>Total</b>	<b>125</b>	<b>100.0</b>	<b>100.0</b>	<b>12,351</b>	<b>100.0</b>	<b>100.0</b>							
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	68	84.0		1,934	32.6								
\$100,001 - \$250,000	7	8.6		1,185	20.0								
\$250,001 - \$1 Million	6	7.4		2,817	47.5								
<b>Total</b>	<b>81</b>	<b>100.0</b>		<b>5,936</b>	<b>100.0</b>								
Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	138	45.4	38.5	8,933	26.4	23.7	143	39.5	45.1	10,765	26.1	25.0	91.7
Over \$1 Million	110	36.2		20,142	59.6		99	27.3		22,363	54.3		7.3
Revenue Unknown	56	18.4		4,713	13.9		120	33.1		8,057	19.6		1.1
<b>Total</b>	<b>304</b>	<b>100.0</b>		<b>33,788</b>	<b>100.0</b>		<b>362</b>	<b>100.0</b>		<b>41,185</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	224	73.7	89.1	8,665	25.6	37.4	269	74.3	92.8	7,780	18.9	41.0	
\$100,001 - \$250,000	44	14.5	6.8	7,712	22.8	22.0	49	13.5	4.4	7,935	19.3	20.2	
\$250,001 - \$1 Million	36	11.8	4.1	17,411	51.5	40.7	44	12.2	2.8	25,470	61.8	38.8	
<b>Total</b>	<b>304</b>	<b>100.0</b>	<b>100.0</b>	<b>33,788</b>	<b>100.0</b>	<b>100.0</b>	<b>362</b>	<b>100.0</b>	<b>100.0</b>	<b>41,185</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	124	89.9		3,954	44.3		125	87.4		3,036	28.2		
\$100,001 - \$250,000	7	5.1		1,177	13.2		7	4.9		1,065	9.9		
\$250,001 - \$1 Million	7	5.1		3,802	42.6		11	7.7		6,664	61.9		
<b>Total</b>	<b>138</b>	<b>100.0</b>		<b>8,933</b>	<b>100.0</b>		<b>143</b>	<b>100.0</b>		<b>10,765</b>	<b>100.0</b>		



Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 20100 (Dover, DE)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	1.7	0.9	100	0.7	0.7	0.7
Moderate	5	8.5	9.5	660	4.9	8.4	11.5
Middle	49	83.1	67.6	11,195	83.7	66.0	72.6
Upper	4	6.8	22.0	1,420	10.6	24.9	15.2
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	
<b>Total</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>13,375</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.6	0	0.0	0.5	0.7
Moderate	7	12.3	8.2	1,060	10.8	7.3	11.5
Middle	41	71.9	70.1	7,111	72.8	68.8	72.6
Upper	9	15.8	21.1	1,603	16.4	23.4	15.2
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	
<b>Total</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>9,774</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	2.3	1.2	75	2.8	1.4	0.7
Moderate	3	7.0	7.6	101	3.7	8.9	11.5
Middle	31	72.1	70.9	2,122	78.8	72.3	72.6
Upper	8	18.6	20.3	396	14.7	17.4	15.2
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	
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>2,694</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	3.0
Moderate	1	100.0	41.7	13,150	100.0	40.5	30.6
Middle	0	0.0	41.7	0	0.0	5.0	56.7
Upper	0	0.0	16.7	0	0.0	54.4	9.7
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>13,150</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	2	1.2	0.8	175	0.4	0.6	0.7
Moderate	16	9.6	8.9	14,971	37.0	9.2	11.5
Middle	125	74.9	68.9	20,978	51.9	64.9	72.6
Upper	24	14.4	21.4	4,286	10.6	25.4	15.2
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	
<b>Total</b>	<b>167</b>	<b>100.0</b>	<b>100.0</b>	<b>40,410</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 20100 (Dover, DE)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	3.5	0.7	269	2.0	0.6	0	0.0	0.7	0	0.0	0.6	0.7
Moderate	5	8.8	8.7	1,246	9.5	7.3	4	11.8	11.3	1,190	13.4	9.5	11.5
Middle	46	80.7	67.7	10,702	81.5	66.7	27	79.4	67.0	6,983	78.7	67.2	72.6
Upper	4	7.0	22.9	921	7.0	25.5	3	8.8	20.9	698	7.9	22.7	15.2
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	
<b>Total</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>13,138</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>8,871</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.2	0	0.0	0.2	2	2.1	0.5	252	1.4	0.3	0.7
Moderate	7	10.3	7.8	1,162	10.3	7.1	7	7.3	8.7	1,318	7.4	7.6	11.5
Middle	45	66.2	70.9	7,692	68.1	69.8	72	75.0	68.7	12,993	72.6	68.3	72.6
Upper	16	23.5	21.1	2,437	21.6	22.8	15	15.6	22.0	3,340	18.7	23.8	15.2
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	
<b>Total</b>	<b>68</b>	<b>100.0</b>	<b>100.0</b>	<b>11,291</b>	<b>100.0</b>	<b>100.0</b>	<b>96</b>	<b>100.0</b>	<b>100.0</b>	<b>17,903</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.0	0	0.0	1.4	2	3.1	0.6	56	1.3	0.2	0.7
Moderate	9	15.3	9.4	438	10.5	8.5	3	4.7	8.3	180	4.2	7.7	11.5
Middle	42	71.2	68.1	3,084	73.9	67.5	49	76.6	74.5	3,476	81.1	73.9	72.6
Upper	8	13.6	21.6	652	15.6	22.6	10	15.6	16.6	576	13.4	18.1	15.2
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	
<b>Total</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>4,174</b>	<b>100.0</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>	<b>100.0</b>	<b>4,288</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	5.6	0	0.0	0.7	0	0.0	22.2	0	0.0	44.0	
Moderate	0	0.0	16.7	0	0.0	2.2	0	0.0	33.3	0	0.0	46.0	30.6
Middle	0	0.0	66.7	0	0.0	84.6	0	0.0	44.4	0	0.0	10.0	56.7
Upper	1	100.0	11.1	12,375	100.0	12.4	0	0.0	0.0	0	0.0	0.0	9.7
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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>12,375</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	3	1.5	0.5	397	0.9	0.4	4	2.0	0.6	308	1.0	1.0	
Moderate	21	10.6	8.4	2,846	6.6	7.1	15	7.6	9.9	2,841	9.0	9.0	11.5
Middle	144	72.4	69.2	23,037	53.5	68.9	150	75.8	68.2	23,670	74.8	67.1	72.6
Upper	31	15.6	21.9	16,812	39.0	23.7	29	14.6	21.3	4,830	15.3	22.9	15.2
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	
<b>Total</b>	<b>199</b>	<b>100.0</b>	<b>100.0</b>	<b>43,092</b>	<b>100.0</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>	<b>100.0</b>	<b>31,649</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 20100 (Dover, DE)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	6	4.4	14.9	863	9.6	10.5	11.9
Moderate	28	20.4	14.6	1,863	20.6	17.2	13.5
Middle	82	59.9	57.3	4,768	52.8	61.7	62.3
Upper	21	15.3	12.5	1,540	17.0	10.2	12.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.3	
<b>Total</b>	<b>137</b>	<b>100.0</b>	<b>100.0</b>	<b>9,034</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 20100 (Dover, DE)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	24	7.1	16.3	3,264	10.3	13.0	27	10.1	22.5	3,152	13.5	20.0	18.3
Moderate	82	24.2	12.7	6,891	21.8	14.1	48	17.9	12.2	2,628	11.3	11.9	12.5
Middle	206	60.8	59.2	18,235	57.8	62.2	163	60.8	52.8	15,562	66.7	54.7	58.0
Upper	27	8.0	11.5	3,148	10.0	10.4	30	11.2	12.1	1,993	8.5	13.3	11.3
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	0.3	0	0.0	0.3	0	0.0	0.4	0	0.0	0.1	
<b>Total</b>	<b>339</b>	<b>100.0</b>	<b>100.0</b>	<b>31,538</b>	<b>100.0</b>	<b>100.0</b>	<b>268</b>	<b>100.0</b>	<b>100.0</b>	<b>23,335</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 20100 (Dover, DE)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	2	3.4	3.1	181	1.4	1.6	21.6
<b>Moderate</b>	10	16.9	18.9	1,724	12.9	15.1	16.6
<b>Middle</b>	8	13.6	27.2	1,799	13.5	27.1	21.7
<b>Upper</b>	35	59.3	29.6	9,117	68.2	35.9	40.1
<b>Unknown</b>	4	6.8	21.2	554	4.1	20.2	0.0
<b>Total</b>	59	100.0	100.0	13,375	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	1	1.8	3.8	46	0.5	2.2	21.6
<b>Moderate</b>	7	12.3	11.2	997	10.2	8.4	16.6
<b>Middle</b>	19	33.3	19.4	2,590	26.5	17.2	21.7
<b>Upper</b>	28	49.1	27.9	5,646	57.8	29.5	40.1
<b>Unknown</b>	2	3.5	37.8	495	5.1	42.8	0.0
<b>Total</b>	57	100.0	100.0	9,774	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	2	4.7	6.4	90	3.3	5.6	21.6
<b>Moderate</b>	9	20.9	19.4	465	17.3	19.1	16.6
<b>Middle</b>	11	25.6	28.2	1,004	37.3	30.8	21.7
<b>Upper</b>	20	46.5	42.4	1,110	41.2	40.0	40.1
<b>Unknown</b>	1	2.3	3.6	25	0.9	4.5	0.0
<b>Total</b>	43	100.0	100.0	2,694	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	5	3.0	3.5	317	1.2	1.9	21.6
<b>Moderate</b>	26	15.7	15.7	3,186	11.7	12.4	16.6
<b>Middle</b>	38	22.9	23.8	5,393	19.8	23.0	21.7
<b>Upper</b>	83	50.0	29.2	15,873	58.2	33.1	40.1
<b>Unknown</b>	14	8.4	27.8	2,491	9.1	29.6	0.0
<b>Total</b>	166	100.0	100.0	27,260	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 20100 (Dover, DE)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	1	1.8	5.3	125	1.0	3.2	2	5.9	3.0	313	3.5	1.7	21.6
Moderate	17	29.8	22.1	3,339	25.4	18.1	6	17.6	18.7	1,202	13.5	15.1	16.6
Middle	15	26.3	27.5	3,686	28.1	28.1	13	38.2	24.7	2,916	32.9	24.8	21.7
Upper	20	35.1	32.4	5,075	38.6	37.2	9	26.5	29.0	3,399	38.3	33.9	40.1
Unknown	4	7.0	12.7	913	6.9	13.3	4	11.8	24.5	1,041	11.7	24.5	0.0
<b>Total</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>13,138</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>8,871</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	5	7.4	2.5	440	3.9	1.4	10	10.4	3.8	1,053	5.9	2.2	21.6
Moderate	15	22.1	9.6	1,688	14.9	7.1	13	13.5	12.2	1,853	10.4	9.7	16.6
Middle	21	30.9	17.2	3,234	28.6	15.1	16	16.7	18.8	2,319	13.0	17.1	21.7
Upper	24	35.3	28.8	5,364	47.5	30.3	49	51.0	30.5	10,847	60.6	32.4	40.1
Unknown	3	4.4	41.9	565	5.0	46.1	8	8.3	34.6	1,831	10.2	38.6	0.0
<b>Total</b>	<b>68</b>	<b>100.0</b>	<b>100.0</b>	<b>11,291</b>	<b>100.0</b>	<b>100.0</b>	<b>96</b>	<b>100.0</b>	<b>100.0</b>	<b>17,903</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	8	13.6	5.2	323	7.7	4.3	4	6.3	6.6	195	4.5	6.1	21.6
Moderate	10	16.9	13.2	648	15.5	11.9	11	17.2	16.3	984	22.9	17.0	16.6
Middle	16	27.1	22.9	1,575	37.7	27.2	18	28.1	24.6	1,211	28.2	25.6	21.7
Upper	24	40.7	55.8	1,603	38.4	52.9	28	43.8	50.1	1,820	42.4	49.8	40.1
Unknown	1	1.7	2.9	25	0.6	3.7	3	4.7	2.3	78	1.8	1.5	0.0
<b>Total</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>4,174</b>	<b>100.0</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>	<b>100.0</b>	<b>4,288</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	14	7.1	3.7	888	2.9	2.2	16	8.1	3.5	1,561	4.9	2.0	21.6
Moderate	42	21.2	14.8	5,675	18.5	12.1	30	15.2	15.1	4,039	12.8	12.4	16.6
Middle	52	26.3	21.2	8,495	27.7	20.8	47	23.7	21.5	6,446	20.4	21.0	21.7
Upper	68	34.3	30.2	12,042	39.2	32.9	86	43.4	30.6	16,066	50.8	33.3	40.1
Unknown	22	11.1	30.0	3,617	11.8	32.1	19	9.6	29.3	3,537	11.2	31.3	0.0
<b>Total</b>	<b>198</b>	<b>100.0</b>	<b>100.0</b>	<b>30,717</b>	<b>100.0</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>	<b>100.0</b>	<b>31,649</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 20100 (Dover, DE)													
	Bank And Aggregate Loans						Total Businesses %						
	Bank		Agg	Bank		Agg							
	#	%	%	\$(000)	%	%							
<b>By Revenue</b>													
\$1 Million or Less	95	69.3	44.9	4,151	45.9	39.2	92.4						
Over \$1 Million	36	26.3		3,950	43.7		6.1						
Revenue Unknown	6	4.4		933	10.3		1.5						
<b>Total</b>	<b>137</b>	<b>100.0</b>		<b>9,034</b>	<b>100.0</b>		<b>100.0</b>						
<b>By Loan Size</b>													
\$100,000 or Less	119	86.9	94.4	3,706	41.0	42.9							
\$100,001 - \$250,000	8	5.8	2.9	1,337	14.8	16.2							
\$250,001 - \$1 Million	10	7.3	2.7	3,991	44.2	40.8							
<b>Total</b>	<b>137</b>	<b>100.0</b>	<b>100.0</b>	<b>9,034</b>	<b>100.0</b>	<b>100.0</b>							
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	87	91.6		2,147	51.7								
\$100,001 - \$250,000	5	5.3		757	18.2								
\$250,001 - \$1 Million	3	3.2		1,247	30.0								
<b>Total</b>	<b>95</b>	<b>100.0</b>		<b>4,151</b>	<b>100.0</b>								
Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 20100 (Dover, DE)													
	Bank And Aggregate Loans By Year										Total Businesses %		
	2020					2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	%	\$(000)	%	\$(000)	%	\$(000)	%	\$(000)	%	\$(000)	%	
<b>By Revenue</b>													
\$1 Million or Less	173	51.0	34.2	11,555	36.6	25.9	121	45.1	47.2	6,790	29.1	30.8	93.1
Over \$1 Million	73	21.5		13,495	42.8		44	16.4		8,477	36.3		5.1
Revenue Unknown	93	27.4		6,488	20.6		103	38.4		8,068	34.6		1.8
<b>Total</b>	<b>339</b>	<b>100.0</b>		<b>31,538</b>	<b>100.0</b>		<b>268</b>	<b>100.0</b>		<b>23,335</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	258	76.1	87.2	9,144	29.0	32.1	219	81.7	92.9	5,971	25.6	38.6	
\$100,001 - \$250,000	52	15.3	7.8	8,385	26.6	23.2	27	10.1	4.1	4,327	18.5	18.3	
\$250,001 - \$1 Million	29	8.6	5.0	14,009	44.4	44.6	22	8.2	3.0	13,037	55.9	43.1	
<b>Total</b>	<b>339</b>	<b>100.0</b>	<b>100.0</b>	<b>31,538</b>	<b>100.0</b>	<b>100.0</b>	<b>268</b>	<b>100.0</b>	<b>100.0</b>	<b>23,335</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	154	89.0		4,645	40.2		111	91.7		2,654	39.1		
\$100,001 - \$250,000	8	4.6		1,303	11.3		4	3.3		632	9.3		
\$250,001 - \$1 Million	11	6.4		5,607	48.5		6	5.0		3,504	51.6		
<b>Total</b>	<b>173</b>	<b>100.0</b>		<b>11,555</b>	<b>100.0</b>		<b>121</b>	<b>100.0</b>		<b>6,790</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 40060 (Richmond, VA)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	2	6.9	8.7	293	4.8	5.9	6.7
Moderate	12	41.4	21.3	2,136	35.2	15.1	20.7
Middle	10	34.5	32.3	1,798	29.6	29.9	34.6
Upper	5	17.2	37.7	1,848	30.4	49.0	38.0
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>6,075</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	5.0	0	0.0	4.1	6.7
Moderate	7	21.9	17.6	1,121	13.2	12.6	20.7
Middle	11	34.4	33.9	2,464	29.0	30.5	34.6
Upper	14	43.8	43.4	4,913	57.8	52.8	38.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>8,498</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	2	15.4	5.3	40	4.1	3.9	6.7
Moderate	2	15.4	15.0	106	11.0	11.8	20.7
Middle	3	23.1	32.3	65	6.7	26.5	34.6
Upper	6	46.2	47.4	754	78.1	57.8	38.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>965</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	13.0	0	0.0	5.5	18.8
Moderate	1	33.3	40.9	16,050	35.7	46.6	31.1
Middle	2	66.7	21.7	28,970	64.3	21.2	24.0
Upper	0	0.0	23.5	0	0.0	26.5	25.5
Unknown	0	0.0	0.9	0	0.0	0.2	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>45,020</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	5	5.9	7.0	454	0.7	5.2	6.7
Moderate	24	28.2	19.5	19,722	31.9	19.9	20.7
Middle	31	36.5	33.0	34,220	55.3	28.5	34.6
Upper	25	29.4	40.4	7,515	12.1	46.3	38.0
Unknown	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>61,911</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 40060 (Richmond, VA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	8.7	9.2	654	10.4	6.5	1	9.1	9.4	344	10.7	6.8	6.7
Moderate	8	34.8	21.5	1,571	25.0	15.9	2	18.2	23.1	481	14.9	18.4	20.7
Middle	5	21.7	32.2	1,033	16.5	30.1	4	36.4	31.4	1,293	40.2	29.2	34.6
Upper	8	34.8	37.1	3,018	48.1	47.5	4	36.4	36.0	1,100	34.2	45.6	38.0
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	
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>6,276</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>3,218</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	4.5	4.0	134	2.5	2.7	3	8.1	4.9	346	4.7	3.5	6.7
Moderate	2	9.1	14.1	175	3.2	10.4	10	27.0	16.7	1,443	19.8	12.2	20.7
Middle	9	40.9	32.2	2,051	37.9	28.4	12	32.4	33.0	2,606	35.7	29.8	34.6
Upper	10	45.5	49.7	3,048	56.4	58.5	12	32.4	45.4	2,899	39.7	54.5	38.0
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	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>5,408</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>7,294</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	10.5	4.4	58	3.6	2.8	1	4.8	4.1	212	7.0	3.3	6.7
Moderate	3	15.8	12.6	115	7.2	10.4	2	9.5	14.2	60	2.0	9.6	20.7
Middle	7	36.8	30.1	636	39.9	26.5	8	38.1	32.2	544	18.0	28.1	34.6
Upper	7	36.8	52.8	783	49.2	60.3	10	47.6	49.4	2,210	73.0	59.0	38.0
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	
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>1,592</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>3,026</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	18.0	0	0.0	15.1	1	50.0	28.5	8,266	12.9	26.4	
Moderate	0	0.0	42.3	0	0.0	37.9	1	50.0	37.4	55,815	87.1	29.6	31.1
Middle	0	0.0	16.2	0	0.0	17.4	0	0.0	19.5	0	0.0	21.3	24.0
Upper	0	0.0	22.5	0	0.0	29.3	0	0.0	13.8	0	0.0	22.4	25.5
Unknown	0	0.0	0.9	0	0.0	0.4	0	0.0	0.8	0	0.0	0.3	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>64,081</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	8	8.6	5.9	1,426	7.7	4.8	6	7.5	6.5	9,168	11.6	6.0	
Moderate	24	25.8	17.0	3,174	17.1	14.1	17	21.3	19.0	57,994	73.3	15.5	20.7
Middle	29	31.2	32.2	5,241	28.3	28.4	30	37.5	32.4	5,538	7.0	29.0	34.6
Upper	32	34.4	44.9	8,701	46.9	52.7	27	33.8	42.1	6,407	8.1	49.4	38.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>93</b>	<b>100.0</b>	<b>100.0</b>	<b>18,542</b>	<b>100.0</b>	<b>100.0</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>79,107</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>



Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 40060 (Richmond, VA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	4	6.6	6.9	160	2.1	8.9	7.2
Moderate	9	14.8	25.6	502	6.7	27.4	26.2
Middle	18	29.5	27.9	1,920	25.7	26.9	28.7
Upper	30	49.2	38.3	4,878	65.4	35.3	37.5
Unknown	0	0.0	0.3	0	0.0	0.7	0.4
Tract-Unk	0	0.0	1.0	0	0.0	0.8	
<b>Total</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>7,460</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 40060 (Richmond, VA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	11	7.4	6.5	663	5.0	6.9	6	6.1	6.7	704	7.8	7.7	7.6
Moderate	29	19.5	24.0	2,716	20.6	26.0	22	22.2	24.5	1,833	20.3	26.8	26.6
Middle	48	32.2	28.6	2,272	17.2	29.7	39	39.4	29.0	3,380	37.4	27.7	28.4
Upper	61	40.9	40.0	7,527	57.1	36.3	32	32.3	39.0	3,124	34.6	36.6	37.0
Unknown	0	0.0	0.4	0	0.0	0.6	0	0.0	0.3	0	0.0	1.1	0.4
Tract-Unk	0	0.0	0.5	0	0.0	0.4	0	0.0	0.5	0	0.0	0.1	
<b>Total</b>	<b>149</b>	<b>100.0</b>	<b>100.0</b>	<b>13,178</b>	<b>100.0</b>	<b>100.0</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>9,041</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 40060 (Richmond, VA)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	4	13.8	7.3	570	9.4	3.8	23.3
<b>Moderate</b>	9	31.0	22.5	1,866	30.7	15.6	17.6
<b>Middle</b>	6	20.7	20.2	1,251	20.6	18.5	18.9
<b>Upper</b>	7	24.1	37.5	2,118	34.9	49.4	40.2
<b>Unknown</b>	3	10.3	12.5	270	4.4	12.8	0.0
<b>Total</b>	29	100.0	100.0	6,075	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	1	3.1	7.1	138	1.6	3.8	23.3
<b>Moderate</b>	7	21.9	17.2	1,333	15.7	12.0	17.6
<b>Middle</b>	5	15.6	19.1	789	9.3	16.5	18.9
<b>Upper</b>	16	50.0	38.8	4,303	50.6	47.9	40.2
<b>Unknown</b>	3	9.4	17.8	1,935	22.8	19.9	0.0
<b>Total</b>	32	100.0	100.0	8,498	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	2	15.4	6.4	110	11.4	4.3	23.3
<b>Moderate</b>	2	15.4	17.1	250	25.9	11.2	17.6
<b>Middle</b>	3	23.1	19.3	294	30.5	15.9	18.9
<b>Upper</b>	6	46.2	53.0	311	32.2	62.3	40.2
<b>Unknown</b>	0	0.0	4.3	0	0.0	6.3	0.0
<b>Total</b>	13	100.0	100.0	965	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	7	8.5	7.2	818	4.8	3.8	23.3
<b>Moderate</b>	18	22.0	19.7	3,449	20.4	13.9	17.6
<b>Middle</b>	14	17.1	19.5	2,334	13.8	17.5	18.9
<b>Upper</b>	29	35.4	38.7	6,732	39.9	48.8	40.2
<b>Unknown</b>	14	17.1	15.0	3,558	21.1	15.9	0.0
<b>Total</b>	82	100.0	100.0	16,891	100.0	100.0	100.0

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 40060 (Richmond, VA)													
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)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	13.0	9.2	504	8.0	5.1	2	18.2	7.6	524	16.3	4.2	23.3
Moderate	5	21.7	23.4	1,090	17.4	17.5	1	9.1	21.9	223	6.9	16.0	17.6
Middle	3	13.0	21.3	419	6.7	20.0	2	18.2	20.2	614	19.1	18.9	18.9
Upper	8	34.8	36.6	3,072	48.9	47.0	4	36.4	34.7	1,525	47.4	44.3	40.2
Unknown	4	17.4	9.5	1,191	19.0	10.4	2	18.2	15.5	332	10.3	16.5	0.0
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>6,276</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>3,218</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	4.5	5.0	150	2.8	2.7	6	16.2	6.8	797	10.9	3.9	23.3
Moderate	3	13.6	15.0	373	6.9	10.6	8	21.6	17.6	1,304	17.9	12.7	17.6
Middle	3	13.6	19.8	440	8.1	17.4	7	18.9	19.8	1,322	18.1	17.6	18.9
Upper	11	50.0	43.9	3,746	69.3	52.3	14	37.8	38.1	3,337	45.7	47.2	40.2
Unknown	4	18.2	16.3	699	12.9	16.9	2	5.4	17.8	534	7.3	18.5	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>5,408</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>7,294</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	2	10.5	5.4	125	7.9	3.6	1	4.8	5.8	24	0.8	3.0	23.3
Moderate	5	26.3	12.5	301	18.9	8.9	7	33.3	14.7	354	11.7	10.0	17.6
Middle	4	21.1	23.4	323	20.3	20.4	5	23.8	22.7	245	8.1	17.0	18.9
Upper	7	36.8	55.3	743	46.7	61.9	8	38.1	52.9	2,403	79.4	64.3	40.2
Unknown	1	5.3	3.4	100	6.3	5.2	0	0.0	3.8	0	0.0	5.7	0.0
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>1,592</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>3,026</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	6	6.5	6.5	779	4.2	3.6	9	11.5	7.1	1,345	9.0	4.0	23.3
Moderate	13	14.0	17.6	1,764	9.5	13.0	16	20.5	18.9	1,881	12.5	13.9	17.6
Middle	10	10.8	20.0	1,182	6.4	18.1	14	17.9	20.0	2,181	14.5	18.0	18.9
Upper	26	28.0	41.0	7,561	40.8	50.0	26	33.3	37.4	7,265	48.3	46.3	40.2
Unknown	38	40.9	15.0	7,256	39.1	15.3	13	16.7	16.7	2,354	15.7	17.7	0.0
<b>Total</b>	<b>93</b>	<b>100.0</b>	<b>100.0</b>	<b>18,542</b>	<b>100.0</b>	<b>100.0</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>15,026</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 40060 (Richmond, VA)													
	Bank And Aggregate Loans						Total Businesses %						
	Bank		Agg	Bank		Agg							
	#	%	%	\$(000)	%	%							
<b>By Revenue</b>													
\$1 Million or Less	42	68.9	48.8	4,953	66.4	38.9	90.7						
Over \$1 Million	17	27.9		1,752	23.5		8.5						
Revenue Unknown	2	3.3		755	10.1		0.8						
<b>Total</b>	<b>61</b>	<b>100.0</b>		<b>7,460</b>	<b>100.0</b>		<b>100.0</b>						
<b>By Loan Size</b>													
\$100,000 or Less	48	78.7	93.1	1,471	19.7	35.0							
\$100,001 - \$250,000	4	6.6	3.0	755	10.1	12.9							
\$250,001 - \$1 Million	9	14.8	3.9	5,234	70.2	52.1							
<b>Total</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>7,460</b>	<b>100.0</b>	<b>100.0</b>							
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	33	78.6		939	19.0								
\$100,001 - \$250,000	3	7.1		505	10.2								
\$250,001 - \$1 Million	6	14.3		3,509	70.8								
<b>Total</b>	<b>42</b>	<b>100.0</b>		<b>4,953</b>	<b>100.0</b>								
Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 40060 (Richmond, VA)													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	64	43.0	45.5	2,830	21.5	26.6	33	33.3	49.2	2,328	25.7	29.1	91.4
Over \$1 Million	35	23.5		5,977	45.4		22	22.2		3,850	42.6		7.8
Revenue Unknown	50	33.6		4,371	33.2		44	44.4		2,863	31.7		0.8
<b>Total</b>	<b>149</b>	<b>100.0</b>		<b>13,178</b>	<b>100.0</b>		<b>99</b>	<b>100.0</b>		<b>9,041</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	112	75.2	85.6	4,168	31.6	29.4	72	72.7	90.9	2,152	23.8	31.7	
\$100,001 - \$250,000	28	18.8	8.0	4,444	33.7	20.3	16	16.2	4.8	2,472	27.3	18.2	
\$250,001 - \$1 Million	9	6.0	6.5	4,566	34.6	50.3	11	11.1	4.3	4,417	48.9	50.2	
<b>Total</b>	<b>149</b>	<b>100.0</b>	<b>100.0</b>	<b>13,178</b>	<b>100.0</b>	<b>100.0</b>	<b>99</b>	<b>100.0</b>	<b>100.0</b>	<b>9,041</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	61	95.3		2,165	76.5		26	78.8		558	24.0		
\$100,001 - \$250,000	2	3.1		366	12.9		3	9.1		499	21.4		
\$250,001 - \$1 Million	1	1.6		299	10.6		4	12.1		1,271	54.6		
<b>Total</b>	<b>64</b>	<b>100.0</b>		<b>2,830</b>	<b>100.0</b>		<b>33</b>	<b>100.0</b>		<b>2,328</b>	<b>100.0</b>		

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 45940 (Trenton-Princeton, NJ)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	3	8.3	3.6	169	2.4	1.1	7.3
Moderate	18	50.0	18.4	2,504	35.6	11.1	16.9
Middle	4	11.1	35.0	1,078	15.3	28.8	32.3
Upper	11	30.6	42.9	3,291	46.7	58.9	43.5
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	
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>7,042</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	2.3	0	0.0	0.6	7.3
Moderate	1	5.9	11.3	100	1.6	6.4	16.9
Middle	5	29.4	33.9	1,200	19.0	27.1	32.3
Upper	11	64.7	52.5	5,021	79.4	65.9	43.5
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	
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>6,321</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	3.5	0	0.0	1.6	7.3
Moderate	2	33.3	11.9	80	22.2	7.4	16.9
Middle	1	16.7	29.1	100	27.8	22.4	32.3
Upper	3	50.0	55.6	180	50.0	68.6	43.5
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	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>360</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	26.8	0	0.0	10.0	17.7
Moderate	0	0.0	41.5	0	0.0	19.3	19.4
Middle	0	0.0	19.5	0	0.0	63.7	32.2
Upper	0	0.0	12.2	0	0.0	7.0	30.8
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	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	6	8.2	3.5	468	3.0	1.9	7.3
Moderate	25	34.2	15.5	3,185	20.4	10.3	16.9
Middle	17	23.3	34.2	3,505	22.4	31.6	32.3
Upper	25	34.2	46.7	8,492	54.3	56.1	43.5
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	
<b>Total</b>	<b>73</b>	<b>100.0</b>	<b>100.0</b>	<b>15,650</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 45940 (Trenton-Princeton, NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	5	11.1	3.7	589	4.9	1.3	7	19.4	4.8	1,197	14.0	1.7	7.3
Moderate	16	35.6	16.3	2,661	22.0	10.6	14	38.9	17.8	2,751	32.1	11.4	16.9
Middle	13	28.9	36.5	3,478	28.8	30.4	11	30.6	34.4	2,929	34.1	29.1	32.3
Upper	11	24.4	43.6	5,348	44.3	57.7	4	11.1	43.1	1,703	19.8	57.8	43.5
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	
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>12,076</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>8,580</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	8.3	1.1	239	2.6	0.4	2	7.4	2.5	204	2.5	1.0	7.3
Moderate	2	8.3	9.3	533	5.7	5.6	4	14.8	11.8	595	7.2	7.2	16.9
Middle	8	33.3	29.9	1,945	20.9	23.2	8	29.6	31.8	2,027	24.5	24.9	32.3
Upper	12	50.0	59.8	6,574	70.8	70.8	13	48.1	53.8	5,451	65.9	66.9	43.5
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	
<b>Total</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>9,291</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>8,277</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.4	0	0.0	0.9	0	0.0	1.7	0	0.0	0.8	7.3
Moderate	0	0.0	10.9	0	0.0	6.4	0	0.0	13.3	0	0.0	6.2	16.9
Middle	0	0.0	29.5	0	0.0	19.3	4	66.7	30.9	320	50.0	21.0	32.3
Upper	3	100.0	57.2	497	100.0	73.4	2	33.3	54.1	320	50.0	71.9	43.5
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	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>497</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>640</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	24.2	0	0.0	4.6	0	0.0	22.4	0	0.0	5.8	
Moderate	0	0.0	30.3	0	0.0	38.8	0	0.0	44.9	0	0.0	7.8	19.4
Middle	0	0.0	30.3	0	0.0	44.3	0	0.0	22.4	0	0.0	17.3	32.2
Upper	0	0.0	15.2	0	0.0	12.3	0	0.0	10.2	0	0.0	69.0	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	10	10.2	2.5	1,030	4.0	1.0	12	14.6	3.5	1,619	8.4	1.7	
Moderate	28	28.6	12.5	4,490	17.3	8.7	22	26.8	14.2	3,848	19.9	8.8	16.9
Middle	31	31.6	32.4	7,512	29.0	26.6	28	34.1	32.7	6,257	32.3	25.7	32.3
Upper	29	29.6	52.7	12,883	49.7	63.6	20	24.4	49.5	7,643	39.5	63.8	43.5
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	
<b>Total</b>	<b>98</b>	<b>100.0</b>	<b>100.0</b>	<b>25,915</b>	<b>100.0</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>	<b>100.0</b>	<b>19,367</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 45940 (Trenton-Princeton, NJ)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	6.4	0	0.0	6.3	8.4
Moderate	1	4.8	15.6	35	0.8	14.2	15.8
Middle	13	61.9	28.4	3,380	78.7	31.2	32.2
Upper	7	33.3	48.7	878	20.5	47.8	43.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.9	0	0.0	0.5	
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>4,293</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
Assessment Area: MSA 45940 (Trenton-Princeton, NJ)														
Geographic Income Level	Bank And Aggregate Loans By Year													Total Businesses %
	2020						2021							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
Low	1	3.1	6.0	499	9.2	5.4	0	0.0	6.3	0	0.0	4.9	8.7	
Moderate	1	3.1	15.3	7	0.1	15.0	3	13.0	17.3	142	4.2	17.3	16.0	
Middle	11	34.4	31.2	1,683	30.9	33.6	6	26.1	29.9	668	19.7	34.2	31.8	
Upper	19	59.4	47.1	3,254	59.8	45.5	14	60.9	46.2	2,585	76.1	43.5	43.5	
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	0.4	0	0.0	0.5	0	0.0	0.3	0	0.0	0.2		
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>5,443</b>	<b>100.0</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>3,395</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	

<b>Distribution of 2019 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 45940 (Trenton-Princeton, NJ)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	14	38.9	12.3	1,568	22.3	6.1	23.9
<b>Moderate</b>	6	16.7	22.4	1,162	16.5	15.5	16.6
<b>Middle</b>	7	19.4	20.0	1,919	27.3	18.6	18.5
<b>Upper</b>	4	11.1	32.6	1,663	23.6	49.1	41.1
<b>Unknown</b>	5	13.9	12.7	730	10.4	10.8	0.0
<b>Total</b>	36	100.0	100.0	7,042	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	6.5	0	0.0	2.9	23.9
<b>Moderate</b>	2	11.8	14.7	557	8.8	9.5	16.6
<b>Middle</b>	5	29.4	19.2	1,176	18.6	15.9	18.5
<b>Upper</b>	9	52.9	42.6	4,488	71.0	55.5	41.1
<b>Unknown</b>	1	5.9	17.1	100	1.6	16.3	0.0
<b>Total</b>	17	100.0	100.0	6,321	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	7.3	0	0.0	4.0	23.9
<b>Moderate</b>	0	0.0	15.5	0	0.0	10.9	16.6
<b>Middle</b>	1	16.7	19.7	50	13.9	15.5	18.5
<b>Upper</b>	4	66.7	53.7	210	58.3	65.6	41.1
<b>Unknown</b>	1	16.7	3.7	100	27.8	4.0	0.0
<b>Total</b>	6	100.0	100.0	360	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	14	19.2	9.4	1,568	10.0	4.7	23.9
<b>Moderate</b>	8	11.0	18.2	1,719	11.0	12.6	16.6
<b>Middle</b>	13	17.8	19.1	3,145	20.1	17.1	18.5
<b>Upper</b>	17	23.3	37.1	6,361	40.6	51.3	41.1
<b>Unknown</b>	21	28.8	16.1	2,857	18.3	14.3	0.0
<b>Total</b>	73	100.0	100.0	15,650	100.0	100.0	100.0



Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 45940 (Trenton-Princeton, NJ)													
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)	\$%		\$%
<b>Home Purchase Loans</b>													
Low	9	20.0	12.3	1,279	10.6	6.6	12	33.3	10.5	2,054	23.9	5.3	23.9
Moderate	14	31.1	24.5	3,333	27.6	18.2	12	33.3	21.2	2,656	31.0	15.3	16.6
Middle	4	8.9	20.5	1,213	10.0	19.4	2	5.6	19.3	622	7.2	17.7	18.5
Upper	9	20.0	31.9	4,664	38.6	46.1	7	19.4	34.1	2,433	28.4	48.4	41.1
Unknown	9	20.0	10.7	1,587	13.1	9.6	3	8.3	14.9	815	9.5	13.4	0.0
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>12,076</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>8,580</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	4.0	0	0.0	1.9	4	14.8	5.2	510	6.2	2.5	23.9
Moderate	3	12.5	12.8	669	7.2	8.3	6	22.2	15.4	913	11.0	9.9	16.6
Middle	4	16.7	20.3	867	9.3	16.9	5	18.5	20.1	1,574	19.0	16.8	18.5
Upper	15	62.5	47.7	7,516	80.9	58.3	10	37.0	44.0	4,687	56.6	56.5	41.1
Unknown	2	8.3	15.2	239	2.6	14.5	2	7.4	15.2	593	7.2	14.2	0.0
<b>Total</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>9,291</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>8,277</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	7.7	0	0.0	4.1	0	0.0	7.1	0	0.0	4.1	23.9
Moderate	0	0.0	15.2	0	0.0	11.0	0	0.0	12.9	0	0.0	7.0	16.6
Middle	0	0.0	22.2	0	0.0	18.4	0	0.0	21.0	0	0.0	15.4	18.5
Upper	3	100.0	52.4	497	100.0	63.5	5	83.3	56.4	540	84.4	70.5	41.1
Unknown	0	0.0	2.4	0	0.0	2.9	1	16.7	2.6	100	15.6	3.0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>497</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>640</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	9	9.2	6.8	1,279	4.9	3.5	16	19.5	7.2	2,564	13.2	3.7	23.9
Moderate	17	17.3	16.3	4,002	15.4	11.6	18	22.0	17.3	3,569	18.4	12.0	16.6
Middle	8	8.2	19.7	2,080	8.0	17.4	7	8.5	19.6	2,196	11.3	17.0	18.5
Upper	27	27.6	41.1	12,677	48.9	53.2	22	26.8	40.6	7,660	39.6	53.4	41.1
Unknown	37	37.8	16.1	5,877	22.7	14.3	19	23.2	15.3	3,378	17.4	14.0	0.0
<b>Total</b>	<b>98</b>	<b>100.0</b>	<b>100.0</b>	<b>25,915</b>	<b>100.0</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>	<b>100.0</b>	<b>19,367</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Distribution of 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 45940 (Trenton-Princeton, NJ)													
	Bank And Aggregate Loans						Total Businesses %						
	Bank		Agg	Bank		Agg							
	#	%	%	\$(000)	%	%							
<b>By Revenue</b>													
\$1 Million or Less	11	52.4	43.5	223	5.2	26.1	89.0						
Over \$1 Million	10	47.6		4,070	94.8		9.9						
Revenue Unknown	0	0.0		0	0.0		1.1						
<b>Total</b>	<b>21</b>	<b>100.0</b>		<b>4,293</b>	<b>100.0</b>		<b>100.0</b>						
<b>By Loan Size</b>													
\$100,000 or Less	13	61.9	94.8	293	6.8	43.1							
\$100,001 - \$250,000	2	9.5	2.6	450	10.5	13.8							
\$250,001 - \$1 Million	6	28.6	2.6	3,550	82.7	43.1							
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>4,293</b>	<b>100.0</b>	<b>100.0</b>							
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	11	100.0		223	100.0								
\$100,001 - \$250,000	0	0.0		0	0.0								
\$250,001 - \$1 Million	0	0.0		0	0.0								
<b>Total</b>	<b>11</b>	<b>100.0</b>		<b>223</b>	<b>100.0</b>								
Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 45940 (Trenton-Princeton, NJ)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
<b>By Revenue</b>													
\$1 Million or Less	17	53.1	38.1	903	16.6	23.2	11	47.8	43.8	2,317	68.2	24.4	89.3
Over \$1 Million	11	34.4		3,426	62.9		6	26.1		926	27.3		9.6
Revenue Unknown	4	12.5		1,114	20.5		6	26.1		152	4.5		1.1
<b>Total</b>	<b>32</b>	<b>100.0</b>		<b>5,443</b>	<b>100.0</b>		<b>23</b>	<b>100.0</b>		<b>3,395</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	21	65.6	87.7	900	16.5	32.8	16	69.6	91.4	574	16.9	35.3	
\$100,001 - \$250,000	4	12.5	7.2	757	13.9	20.9	2	8.7	5.0	365	10.8	19.3	
\$250,001 - \$1 Million	7	21.9	5.1	3,786	69.6	46.3	5	21.7	3.6	2,456	72.3	45.4	
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>5,443</b>	<b>100.0</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>3,395</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	16	94.1		655	72.5		6	54.5		209	9.0		
\$100,001 - \$250,000	1	5.9		248	27.5		1	9.1		150	6.5		
\$250,001 - \$1 Million	0	0.0		0	0.0		4	36.4		1,958	84.5		
<b>Total</b>	<b>17</b>	<b>100.0</b>		<b>903</b>	<b>100.0</b>		<b>11</b>	<b>100.0</b>		<b>2,317</b>	<b>100.0</b>		