

PUBLIC DISCLOSURE

April 18, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Five Star Bank
RSSD No. 601416

220 Liberty Street
Warsaw, NY 14569

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 RATING

INSTITUTION’S CRA RATING: SATISFACTORY

The following table indicates the performance level of Five Star Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	FIVE STAR BANK		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	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 follow:

Lending Test:

- Lending levels reflected good responsiveness to assessment area (“AA”) credit needs.
- A substantial majority of loans were made in the bank’s AA.

- The geographic distribution of loans reflected good penetration throughout the AA.
- 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- and moderate-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 AA credit needs.

Investment Test:

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

Service Test:

- Delivery systems were accessible to the bank's geographies and individuals of different income levels in its AA.
- The bank's record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly to low- or moderate-income ("LMI") geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or LMI individuals.
- The bank provided a relatively high level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Five Star (“Five Star”, or “bank”), headquartered in Warsaw, New York, is a full-service commercial bank with 49 branches in central and western New York State. The bank is a wholly-owned subsidiary of Financial Institutions, Inc., a one-bank holding company.

The bank offers a variety of credit products to consumers and businesses. Consumer products include residential mortgages (fixed and adjustable rate), home equity loans and lines of credit, motor vehicle, and unsecured personal loans. Commercial products include commercial mortgages, term loans, lines of credit, construction loans, equipment lines, and Small Business Administration (“SBA”) 7A and 504 loans to small businesses. The bank also offers agricultural loans; however, these loans represent a small percentage of the bank’s total loan portfolio.

Based on the December 31, 2021 Federal Financial Institutions Examination Council’s (“FFIEC”) Consolidated Report of Condition and Income (“Call Report”), Five Star had total assets of \$5.5 billion, gross total loans and leases of \$ 3.7 billion and total domestic deposits of \$5.1 billion. The subsequent table summarizes the composition of Five Star’s loan portfolio:

Loan Type	Total Loans	Percent of Total
1-4 Residential Real Estate Secured	\$620,752,000	16.8%
Construction and Development	\$251,789,000	6.8%
Multi-family Dwelling	\$287,326,000	7.8%
HELOCs	\$71,051,000	1.9%
Consumer	\$972,145,000	26.4%
Agriculture	\$24,358,000	0.7%
Commercial and Industrial	\$559,709,000	15.2%
Nonfarm Nonresidential Properties	\$842,360,000	22.9%
Other	\$56,147,000	1.5%
Total	\$3,685,637,000	100.0%

FFIEC Consolidated Report of Condition and Income Data as of December 31, 2021

The subsequent table summarizes the composition of Five Star's deposits based on the December 31, 2021, Uniform Bank Performance Report ("UBPR").

Deposit Type	Total Deposits	Percent of Total
Demand Deposits	\$516,060,000	10.1%
All Now & ATS Accounts	\$210,292,000	4.1%
Money Market Deposit Accounts	\$2,631,442,000	51.5%
Other Savings Deposits	\$587,822,000	11.5%
Time Deposits at or below Insurance Level	\$692,493,000	13.6%
Time Deposits over Insurance Level	\$216,764,000	4.2%
Brokered Deposits	\$254,674,000	5.0%
Total	\$5,109,547,000	100.0%
<i>Uniform Bank Performance Report ("UBPR") Data as of December 31, 2021</i>		

During the review period, Five Star operated in a competitive market with numerous local, regional, and national financial institutions conducting business in the bank's four assessment areas. Based on deposits reported to the Federal Deposit Insurance Corporation ("FDIC"), on June 30, 2021, Five Star ranked 4th in deposit market share (4.5%) in the aggregate of counties in which Five Star's assessment areas are located. Five Star's assessment areas included 37 institutions, primarily dominated by larger financial institutions, such as M&T Bank and KeyBank. These two banks held 60.3% of the deposit market share as of June 30, 2021.

Five Star faced no financial or legal impediments that would prevent it from fulfilling its responsibilities under the Community Reinvestment Act ("CRA") or from helping to meet the credit needs of its assessment areas consistent with its business strategy, size, financial capacity, and local economic conditions.

DESCRIPTION OF ASSESSMENT AREA

Five Star delineated four assessment areas located in the State of New York as described below.

Full Scope Assessment Areas:

- Non-Metropolitan, NY assessment area consisted of Allegany, Cayuga, Cattaraugus, Genesee, Schuyler, Seneca, Steuben, and Wyoming Counties, and portions of Chautauqua County, NY.

- MSA 40380 (Rochester, NY) assessment area consisted of Livingston, Monroe, Ontario, Orleans, Wayne, and Yates Counties. Five Star delineated the entirety of the Rochester, NY MSA.
- MSA 15380 (Buffalo-Cheektowaga, NY) assessment area consisted of Erie County. Five Star did not delineate the entirety of MSA 15380 (Buffalo-Cheektowaga, NY), as it excluded Niagara County.
- MSA 21300 (Elmira, NY) assessment area consisted of Chemung County, NY. Five Star delineated the entirety of the Elmira, NY MSA.

Five Star's assessment areas were determined to be in compliance with the requirements of Section 228.41 of Regulation BB and did not arbitrarily exclude low- and moderate-income geographies.

Previous Public Evaluation

Five Star received a "Satisfactory" rating as a result of the May 6, 2019 performance evaluation by the Federal Reserve Bank of New York. The lending, investment, and service tests were each rated High Satisfactory.

SCOPE OF EXAMINATION

Procedures

Five Star's CRA performance was reviewed using the FFIEC Interagency CRA Examination Procedures for Large Institutions which consists of 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

Home purchase, refinance, and home improvement loans reportable under the Home Mortgage Disclosure Act ("HMDA") and small business loans reportable under CRA were analyzed for overall lending activity. Examiners verified the integrity of the 2018, 2019, and 2020 HMDA, and small business loan data reported by Five Star. Multi-family loans and small farm loans were not analyzed for geographic and borrower loan distribution as the volume was insufficient. However, multi-family loans were considered in the evaluation of assessment areas concentration and community development lending.

Evaluation Period

Home purchase, refinance, home improvement, and small business loans originated between January 1, 2018 and December 31, 2020 were used in the analysis. Community development loans, investments, philanthropic grants, and services provided between October 1, 2018 and December 31, 2021 were evaluated as qualifying community development activities.

Lending Analysis

Under the lending test, borrower and geographic loan distribution analyses were based on loan activity in Five Star's assessment areas. Five Star's performance for 2018, 2019, and 2020 was compared to the U.S. Department of Commerce's Bureau of the Census 2015 American Community Survey ("ACS") demographic data.

The analyses of borrower and geographic distribution were based on loans made in Five Star's assessment areas. To evaluate the geographic distribution, the proportion of home purchase, refinance, and home improvement loan originations in LMI and non-LMI geographies were compared to the proportion of owner-occupied housing units located in LMI and non-LMI geographies. With regard to small business loans, the analysis compared the proportion of loan originations located in LMI and non-LMI geographies with the proportion of businesses located in LMI geographies, based on Dun & Bradstreet ("D&B") data. Performance with regard to low-income was analyzed separately from performance in moderate-income geographies.

To analyze the distribution of home purchase, refinance, and home improvement lending by borrower profile, the proportions of originations to LMI and non-LMI borrowers was compared to the proportion of LMI and non-LMI families in the assessment areas. Median family income ("MFI") estimates from the FFIEC were used to categorize borrower income. FFIEC-adjusted median family income figures for 2018, 2019, and 2020 were used to categorize borrower income levels for 2018, 2019, and 2020 loans respectively. For small business lending, Five Star's proportion of loans to businesses with gross annual revenues ("GAR") of \$1 million or less, based on D&B data for 2018, 2019, and 2020, were compared to the proportion of all such businesses located in the assessment areas. The size of the small business loans was also used as a proxy to identify lending to businesses.

Demographic and economic information was also considered. Information was obtained from publicly available sources including the 2015 ACS, the U.S. Department of Labor ("DOL"), FFIEC, and U.S. Department of Housing and Urban Development ("HUD").

Borrower profile and geographic distribution analyses were also based on Five Star's performance

for 2018, 2019, and 2020 which was compared to performance data for 2018, 2019, and 2020 of the aggregate of all loan reporters in the bank's assessment areas. Aggregate lenders included all lenders required to report HMDA-reportable and CRA small business lending data within the assessment areas. For retail services, Five Star's branch distribution analysis was conducted using data as of December 31, 2021.

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 benefitted the bank's assessment areas or the broader statewide or regional area ("BSRA") that included the assessment area. In addition, in accordance with CA Letter 21-5 Community Reinvestment Act Consideration for Activities in Response to the Coronavirus, and its attachments, qualified community development activities supporting community needs related to the COVID-19 pandemic located outside of the assessment 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 the respective assessment areas, 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. Local peer banks were selected based on asset size, deposits, branching structure, and presence within Five Star's assessment areas. Additionally, as Five Star met the needs of its assessment areas, examiners considered community development activities that were conducted in the BSRA that included its assessment areas.

Community Contacts

Examiners conducted interviews with representatives of four community development organizations in order to gain an understanding of local credit needs. A community contact from a social service agency focused on poverty alleviation stated that Five Star Bank showed leadership in opening a branch in heart of the city's low-income area, and that the branch benefited both businesses and individuals living in the area. The community contact noted that banks could do more to support local entrepreneurs, rental assistance programs, and first-time home buyers.

Another community contact from a social services agency serving needy families shared that one of the greatest needs was developing a skilled workforce through both workshops and on-the-job

training. The community contact also noted that the existing affordable housing in the community is very old and often subjected to deferred maintenance.

A community contact from a community development corporation shared her desire for banks to offer insight about banking jobs to local youth and perhaps to offer job-shadowing programs. The community contact also stated there was a need for more financial literacy classes and mentorship programs and that additional investment is needed for new stores, such as laundromats and dollar stores which would help spark development and to try to retain local residents.

A community contact from an organization focused on economic self-sufficiency, entrepreneurial training, technical assistance, providing capital to new and expanding businesses, and mortgage products for underserved borrowers, shared that the area needs access to affordable low-dollar loans.

Deriving Overall Conclusions

Before reaching a conclusion about the overall performance regarding geographic distribution and borrower characteristics in the assessment areas, examiners compared loan originations in each loan product category to total retail lending volume to determine the influence of performance by product on the overall conclusion.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**LENDING TEST**

Five Star's overall performance in meeting the credit needs of its assessment areas is rated High Satisfactory. Five Star's responsiveness to the retail credit needs of its assessment areas was good given the bank's capacity and the overall market conditions. A substantial majority of Five Star's HMDA and small business loans were made in its assessment areas and the geographic distribution of loans reflected good penetration throughout the assessment areas. The overall distribution of loans among borrowers of different income levels and businesses of different sizes was good based on good performance. Five Star was a leader in originating community development loans and made use of innovative and/or flexible lending practices in serving the needs of its assessment areas. Five Star made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Lending Activity

Five Star's responsiveness to the retail credit needs of its assessment areas was good given the bank's capacity and the overall market conditions which included both the state of the housing market and local economic conditions. Overall, 7,085 home purchase, refinance, home improvement, multi-family, small business, and small farm loans were made during the evaluation period, totaling approximately \$1.2 billion.

The subsequent table provides a summary of Five Star's lending activity during the review period:

SUMMARY OF LENDING ACTIVITY				
January 1, 2018 – December 31, 2020				
Loan Type	#	%	\$ (,000)	%
HMDA Home Purchase - Conventional	2,572	36.3	\$362,400	29.8
HMDA Home Purchase – FHA	134	1.9	\$19,271	1.6
HMDA Home Purchase – VA	20	0.3	\$4,061	0.3
HMDA Home Improvement	186	2.6	\$9,478	0.8
HMDA Multi-family	77	1.1	\$271,262	22.3
HMDA Refinancing	1,219	17.2	\$172,621	14.2
Total HMDA	4,208	59.4	\$839,093	68.9
Total Small Business	2,793	39.4	\$368,531	30.3
Total Small Farm	84	1.2	\$9,993	0.8
TOTAL LOANS	7,085	100.0	\$1,217,617	100.0

Note: This table includes bank and affiliate loans made within the examination period.

Assessment Area Concentration

A substantial majority of Five Star’s HMDA and small business loans were made in its assessment areas. During the evaluation period, Five Star made 92.8% of its total loans by number, and 88.2% by dollar volume, in its assessment areas.

The table below presents the bank’s lending inside and outside of the assessment areas during the review period:

LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREAS								
January 1, 2018 – December 31, 2020								
Loan Type	Inside				Outside			
	#	%	\$ (,000)	%	#	%	\$ (,000)	%
Home Purchase - Conventional	2,320	90.2	\$327,633	90.4	252	9.8	\$34,767	2.6
Home Purchase – FHA	116	86.6	16,859	87.5	18	13.4	2,412	12.5
Home Purchase – VA	17	85.0	3,565	87.8	3	15.0	496	12.2
Home Improvement	182	97.8	9,227	97.4	4	2.2	251	2.6
Multi-Family Housing	58	75.3	\$216,925	80.0	19	24.7	\$54,337	20.0
Refinancing	1,171	96.1	\$163,115	94.5	48	3.9	\$9,506	5.5
Total HMDA	3,864	91.8	\$737,324	87.9	344	8.2	\$101,769	12.1
Total Small Business	2,626	94.0	\$327,077	88.8	167	6.0	\$41,454	11.2
Total Small Farm	82	97.6	\$9,293	93.0	2	2.4	\$700	7.0
TOTAL LOANS	6,572	92.8	\$1,073,694	88.2	513	7.2	\$143,923	11.8

Note: This table includes only loans originated or purchased by the bank. Affiliate loans are not included.

Geographic Distribution of Loans

The overall geographic distribution of HMDA-related and small business loans reflected good penetration in LMI geographies based on good performance in the Non-Metropolitan, NY, MSA 40380 (Rochester, NY), MSA 15380 (Buffalo-Cheektowaga, NY), and MSA 21300 (Elmira, NY) assessment areas.

Five Star participated in the SBA Paycheck Protection Program (“PPP”) originated 1,736 loans pursuant to the SBA Paycheck Protection Program (“PPP”), established by the Coronavirus Aid, Relief, and Economic Security Act (“CARES Act”) of 2020 and designed to provide direct capital for small businesses adversely affected by the COVID-19 pandemic to keep workers on small business payrolls. PPP lending had a positive impact on Five Star’s geographic distribution of small business loans in 2020.

Distribution by Borrower Income and Revenue Size of Business

The overall distribution of loans among borrowers of different income levels and businesses of different sizes was good based on good performance in the Non-Metropolitan, NY, MSA 40380 (Rochester, NY), MSA 15380 (Buffalo-Cheektowaga, NY), and MSA 21300 (Elmira, NY) assessment areas.

Community Development Lending

Five Star's was a leader in originating community development loans and made use of innovative and/or flexible lending practices in serving the needs of its assessment areas. Overall, Five Star made 34 qualified community development loans, totaling \$113.9 million. Of the bank's total qualified community development lending, 15 loans totaling \$26.7 million were originated pursuant to the SBA Paycheck Protection Program. PPP loans in amounts greater than \$1 million may be considered as community development loans if they also have a primary purpose of community development as defined under the CRA.

Five Star made 29 qualified community development loans totaling \$102.1 million within its assessment areas. Because Five Star fulfilled its CRA obligations within its assessment areas, qualified community development loans that benefitted the broader statewide or regional area were also considered. The bank originated five community development loans benefitting the broader statewide or regional area, totaling \$11.8 million.

As detailed in the subsequent chart, Five Star's community development lending supported affordable housing, which represented 49.6% of all community development loans by dollar volume. Community development lending promoted economic development was 30.6% by dollar volume while lending that supported the revitalization and stabilization of LMI communities was 18.0% by dollar volume.

COMMUNITY DEVELOPMENT LOAN SUMMARY										
October 1, 2018 – December 31, 2021										
Assessment Areas	Affordable Housing		Community Services		Economic Development		Revitalize & Stabilize		Totals	
	#	\$(,000)	#	\$(,000)	#	\$(,000)	#	\$(,000)	#	\$(,000)
Non-Metropolitan, NY	2	\$16,427	0	\$0	1	\$1,221	0	\$0	3	\$17,648
MSA 40380	5	\$22,889	0	\$0	6	\$19,586	2	\$7,675	13	\$50,150
MSA 15380	2	\$8,650	1	\$2,000	6	\$8,186	3	\$9,334	12	\$28,170
MSA 21300	1	\$6,130	0	\$0	0	\$0	0	\$0	1	\$6,130
Total Loans in Assessment Areas	10	\$54,096	1	\$2,000	13	\$28,993	5	\$17,009	29	\$102,098
Broader Statewide or Regional Area Loans	1	\$2,400	0	\$0	3	\$5,898	1	\$3,468	5	\$11,766
Total Community Development Loans	11	\$56,496	1	\$2,000	16	\$34,891	6	\$20,477	34	\$113,864
Percent of Total	32.4%	49.6%	2.9%	1.8%	47.1%	30.6%	17.6%	18.0%	100%	100%

When Five Star’s performance ratio of annualized community development loans as a percentage of deposits, Tier 1 capital, and average quarterly assets was compared to four similarly situated banks, Five Star ranked 2nd of 5 banks in each of the performance measures.

Innovative or Flexible Lending Practices

Five Star made use of innovative and/or flexible lending practices in serving assessment area credit needs. A number of Five Star’s products were responsive to specific community needs in the assessment areas as summarized below:

Home For You Mortgage - A mortgage product designed to provide easier access to home ownership for borrowers with income that was less than 80.0% of the area median income. The program featured a discounted fixed interest rate, reduced closing costs, a low-down payment, up to a 97% loan to value (“LTV”), no private mortgage insurance (“PMI”), and up to a \$3,000 grant for qualified applicants. Under this program, Five Star originated 1,443 loans between October 1, 2018 through November 30, 2021.

The Neighborhood Home Loan - A mortgage product designed for borrowers purchasing a home in LMI geographies within Allegany, Cattaraugus, Cayuga, Chautauqua, Chemung, Genesee, Niagara, Ontario, Schuyler, Seneca, Steuben, Wayne, Wyoming, and Yates Counties. This loan program featured a lower down payment, no PMI, and no income restrictions. The product started

in 2018. The bank originated 19 loans during the current review period.

Federal Home Loan Bank of New York's Homebuyer Dream Program - Offered grants up to \$10,000 towards down payment and closing cost assistance to eligible first-time homebuyers purchasing a home. The grant application was done in conjunction with the Five Star loan application. During the review period, 126 grants were awarded.

SBA Paycheck Protection Program - Loans designed to provide a direct incentive to small businesses adversely affected by the COVID-19 pandemic to keep their workers on the payroll. In 2020, of the PPP loans originated by Five Star, 15 were over \$1 million that qualified as community development loans.

Five Star also offered and participated in several flexible lending programs which provided borrowers with options to obtain mortgage loans. These programs included government guaranteed loans through Freddie Mac (Home One), the Federal Housing Administration (FHA), the State of New York Mortgage Association Bond Program (SONYMA), the Veterans Administration, and the United States Department of Agriculture's Rural Development (Rural Housing Service Program).

INVESTMENT TEST

Five Star's performance relative to the investment test is rated High Satisfactory based on the significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank made significant use of innovative and/or complex investments to support community development initiatives. In addition, the bank exhibited good responsiveness to credit and community development needs in its assessment areas.

During the current evaluation period, qualified investments totaled \$100.3 million. During the previous evaluation, the bank made \$84.7 million in qualified investments representing an annualized increase of 82.2% in qualified investments since the previous evaluation. The table below represents the total qualified investments made during the evaluation period.

COMMUNITY DEVELOPMENT INVESTMENT SUMMARY										
October 1, 2018 – December 31, 2021										
Assessment Areas	Affordable Housing		Community Services		Economic Development		Revitalize & Stabilize		Totals	
	#	\$(,000)	#	\$(,000)	#	\$(,000)	#	\$(,000)	#	\$(,000)
Non-Metropolitan, NY	8	\$17,172	26	\$1,806	0	\$0	16	\$861	50	\$19,839
MSA 40380	16	\$43,648	6	\$1,242	0	\$0	8	\$13,070	30	\$57,960
MSA 15380	12	\$12,937	0	\$0	0	\$0	0	\$0	12	\$12,937
MSA 21300	1	\$9,045	0	\$0	0	\$0	0	\$0	1	\$9,045
Total Investments in Assessment Areas	37	\$82,802	32	\$3,048	0	\$0	24	\$13,931	93	\$99,781
Broader Statewide or Regional Area Loans	1	\$550	0	\$0	0	\$0	0	\$0	1	\$550
Total Community Development Investments	38	\$83,352	32	\$3,048	0	\$0	24	\$13,931	94	\$100,331
Percent of Total	40.4%	83.1%	34.0%	3.0%	0.0%	0.0%	25.5%	13.9%	100%	100%

Five Star invested a total of \$51.5 million, or 51.3% by dollar amount, of new qualified investments in Low-Income Housing Tax Credits that financed affordable housing. Additionally, the bank purchased a total of \$31.8 million, or 31.7% by dollar amount, of mortgage-backed securities that financed affordable housing to LMI individuals and families.

Qualified investments included 217 grants and donations totaling \$1,448,846 made during the evaluation period primarily to organizations providing community services to LMI recipients in the assessment areas; however, donations were also made for affordable housing and economic development programs. On an annualized basis, grants and donations made in the current evaluation period increased 180.7% over the previous evaluation period.

SERVICE TEST

Five Star's performance relative to the service test is rated High Satisfactory based on delivery systems that were accessible to the bank's geographies and individuals of different income levels in this assessment area, a record of opening and closing of branches that 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 this assessment area, particularly to LMI geographies and/or LMI individuals; and having provided a relatively high level of community development services.

Retail Services

Five Star’s delivery systems were accessible to the bank’s geographies and individuals of different income levels in its assessment areas. As of December 31, 2021, the bank operated a network of 49 branch locations, including its main office. Of the bank’s total branches, three were located in low-income census tracts, seven in moderate-income census tracts, twenty-eight in middle-income census tracts, and ten in upper-income census tracts. Additionally, one branch was located in an unknown-income census tract, which was adjacent to LMI census tracts.

Five Star’s record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Five Star opened two branches during the evaluation period, one in a moderate-income census tract and one in an upper-income census tract. The bank relocated one branch from a low-income census tract to another location within the same low-income census tract. Five Star closed a total of seven branches, six of which closed on October 23, 2020, due to low foot traffic in the branches. Three of the closed branches were located in moderate-income census tracts. Five Star’s branches and ATMs are summarized in the subsequent table:

Summary of Five Star’s Branches Branch Location By Census Tract Income Level						
As of December 31, 2021						
Tract Income Category	Branches		ATMs			
			Full Service		Cash Only	
	#	%	#	%	#	%
Low	3	6.1	4	7.3	0	0.0
Moderate	7	14.3	11	20.0	2	13.3
Middle	28	57.1	28	50.9	12	80.0
Upper	10	20.4	10	18.2	1	6.7
Unknown	1	2.0	2	3.6	0	0.0
Total	49	100.0	55	100.0	15	100.0

ATMs include both branch and off-site locations.

Five Star operated full-service Automated Teller Machines (“ATMs”) at each of its branches. The bank also made use of Interactive Teller Machines (“ITMs”) at two branches located in moderate-income census tracts. Five Star also maintained 13 proprietary cash-only ATMs at off-site locations, two of which were located in moderate-income census tracts. Five Star was also connected to the Allpoint network of ATMs which were available in retail locations on a nationwide basis. In addition, Five Star offered alternative delivery systems which included bank-by-mail, on-line and mobile banking, and 24-hour telephone banking.

All Five Star products and services were available at each branch location and branch hours did not vary in a way that inconvenienced individuals, particularly to LMI and/or LMI geographies. Approximately 95.9% of the Five Star branches had extended weekday evening hours. 55.1% of

the branches had Saturday lobby hours, five of which were located in LMI census tracts.

In addition to its branches and ATMs, Five Star maintained a full-service website that offered customers online banking products, including checking and savings accounts, money market accounts, and certificates of deposit. Customers were able to initiate residential home loan and home equity finance applications online. Five Star’s products and services were also accessible through the bank’s mobile application which was available on both Android and IOS platforms. In addition, the bank’s website offered a suite of products and services to business customers.

Community Development Services

Five Star provided a relatively high level of community development services in its assessment areas. As presented in the table below, Five Star conducted 143 community service events, representing a 21.4% decrease in annualized community development services since the previous CRA examination; it is important to note that due to the COVID-19 pandemic, in-person events were significantly restricted. These consisted of a wide variety of events related to the financial education of children and adults, first-time homebuyers, economic development, and technical assistance.

Summary of Community Development Services October 1, 2018 – December 31, 2021	
Activity Type	Current Evaluation Total
Financial Education	74
Technical Assistance	26
Small Business Seminars	0
Board Participation	43
TOTAL ACTIVITY	143

Bank officers and senior staff served on the boards and committees of 29 community development organizations that provided on-going financial and management expertise and to organizations focused on LMI youth, children in foster care, support for homeless individuals, and supportive housing for at-risk and disabled individuals.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

NON-METROPOLITAN AREA (FULL REVIEW)

Non-Metropolitan, NY Assessment Area

DESCRIPTION OF INSTITUTION'S OPERATIONS

As of December 31, 2021, Five Star operated 20 of 49 branches (40.8%) in the assessment area. These branches generated \$2.8 billion in deposits which accounted for 56.9% of the bank's total branch deposits as of June 30, 2021. Of the bank's total HMDA-reportable, small business, and small farm loans originated between 2018 and 2020, 29.0% were originated in this assessment area.

Five Star was the largest depository institution in the assessment area with a deposit market share of 23.8%, followed by Community Bank, N.A. with 23.0% of the deposit market share. Other lead banks in terms of deposit market share that operated in the assessment area included KeyBank, M&T Bank, and The Bank of Castile.

PERFORMANCE CONTEXT

The following demographic and economic information were obtained from publicly available sources that included the 2010 Census, 2015 ACS, FFIEC, D&B, the New York State Department of Labor, and HUD.

Demographic Characteristics

The Non-Metropolitan, NY assessment area included Allegany, Cattaraugus, Cayuga, Genesee, Schuyler, Seneca, Steuben, and Wyoming Counties and a portion of Chautauqua County, NY. The counties were contiguous and were located in the primarily rural regions of central and western New York State which included the Finger Lakes region. According to the 2015 ACS, the Non-Metropolitan, NY assessment area population totaled 532,244, a decrease of 1.0% from the 2010 ACS. The Non-Metropolitan, NY assessment area contained 22.0% of the bank's combined assessment areas population. The assessment area consisted of 144 census tracts of which 4 or 2.8% were low-income, 12 or 8.3% were moderate-income, 113 or 78.5% were middle-income, 12 or 8.3% were upper-income, and 3 or 2.1% were unknown-income. In 2018, the assessment area included 11 census tracts in Allegany County that met the FFIEC definition of Distressed

Middle-Income Non-Metropolitan Census Tracts based on unemployment levels. In 2018 through 2020, five census tracts in Schuyler County met the FFIEC definition of Underserved Middle-Income Non-Metropolitan Census Tracts for remote rural areas.

Income Characteristics

Based on the 2015 ACS data, the Non-Metropolitan, NY assessment area had 136,456 families of which 20.5% were low-income (10.9% of which were below the poverty level), 18.4% were moderate-income, 22.1% were middle-income, and 39.1% were upper-income.

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

Non-Metropolitan, NY Assessment Area - Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$58,554	\$58,482	-0.12%
Allegany County, NY	\$54,299	\$52,942	-2.50%
Cattaraugus County, NY	\$55,784	\$53,921	-3.34%
Cayuga County, NY	\$63,988	\$63,969	-0.03%
Chautauqua County, NY	\$55,570	\$54,131	-2.59%
Genesee County, NY	\$65,475	\$64,483	-1.52%
Schuyler County, NY	\$59,154	\$61,155	3.38%
Seneca County, NY	\$58,648	\$63,975	9.08%
Steuben County, NY	\$57,570	\$57,508	-0.11%
Wyoming County, NY	\$63,169	\$64,100	1.47%
Non-MSA New York State	\$59,224	\$59,570	0.58%
New York State	\$73,401	\$71,913	-2.03%
<small>Source: 2006 - 2010 U.S. Census Bureau American Community Survey 2011 - 2015 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</small>			

Housing Characteristics

Based on the 2015 ACS data, the Non-Metropolitan, NY assessment area had 260,022 housing units of which 58.5% were owner-occupied, 23.5% were rental, and 18.0% were vacant. Of the total housing units, 1.8% were located in low-income tracts, 8.5% in moderate-income tracts,

81.3% in middle-income tracts, 8.4% in upper-income tracts, and 0.0% in unknown-income tracts. In low-income census tracts, 21.8% of housing units were owner-occupied, 65.6% were rental units, and 12.6% were vacant. In moderate-income census tracts, 44.8% of housing units were owner-occupied, 40.5% were rental units, and 14.7% were vacant.

The median age of housing stock in the assessment area was 61 years old, with 44.5% of the stock built before 1950. According to the 2015 ACS, the median housing value in the assessment area was \$93,125 with an affordability ratio of 50.4. The median gross rent in the assessment area was \$643 per month.

Non-Metropolitan, NY Assessment Area – Housing Characteristics			
Area	2015 Median Housing Value	2015 Affordability Ration	2015 Median Gross Rent
Assessment Area	\$93,125	50.4	\$643
Allegany County, NY	\$70,300	60.9	\$606
Cattaraugus County, NY	\$84,600	50.4	\$617
Cayuga County, NY	\$113,600	45.9	\$673
Chautauqua County, NY	\$84,500	50.9	\$612
Genesee County, NY	\$107,000	47.6	\$724
Schuyler County, NY	\$108,500	43.9	\$640
Seneca County, NY	\$97,000	50.8	\$716
Steuben County, NY	\$91,000	52.0	\$658
Wyoming County, NY	\$102,000	51.5	\$589
Non-MSA New York State	\$109,604	43.0	\$692
New York State	\$283,400	20.9	\$1,132

Housing Cost Burden

According to HUD's Comprehensive Housing Affordability Strategy data, within the assessment area, 41.1% of all rental households had rental costs that exceeded 30% of their incomes, 73.0% of low-income rental households had rental costs that exceeded 30% of their income, and 24.2% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within the assessment area, 17.9% 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 28.6% of moderate-income homeowners had housing costs

that exceeded 30% of their income. See the subsequent table for more details.

Non-Metropolitan, NY Assessment Area - Housing Cost Burden						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	73.0%	24.2%	41.1%	61.3%	28.6%	17.9%
Allegany County, NY	73.6%	26.4%	44.1%	63.4%	27.3%	18.6%
Cattaraugus County, NY	70.2%	22.1%	41.6%	59.2%	24.2%	17.0%
Cayuga County, NY	71.1%	28.1%	38.3%	65.1%	32.6%	18.7%
Chautauqua County, NY	79.1%	23.0%	46.7%	61.0%	26.3%	18.1%
Genesee County, NY	75.1%	15.0%	38.8%	63.0%	35.7%	17.6%
Schuyler County, NY	70.7%	23.1%	39.5%	58.3%	28.8%	18.8%
Seneca County, NY	75.0%	29.5%	41.1%	61.3%	29.1%	17.9%
Steuben County, NY	66.2%	28.6%	36.9%	58.4%	28.5%	17.7%
Wyoming County, NY	70.5%	20.4%	36.1%	63.5%	29.3%	17.0%
Non-MSA New York State	73.3%	30.3%	42.2%	63.7%	31.6%	19.5%
New York State	77.0%	45.6%	48.4%	73.5%	45.3%	28.2%

*Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy*

Labor, Employment and Economic Characteristics

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 5.6% in 2016 and 2017, decreased to 4.8% in 2018, decreased to 4.4% in 2019, and increased to 8.3% in 2020. New York State had an unemployment rate of 4.9% in 2016, decreased to 4.6% in 2017, decreased to 4.1% in 2018, decreased to 3.8% in 2019, and increased to 10.0% in 2020. The COVID-19 pandemic caused businesses to close or reduce their workforce across New York State which drastically increased the unemployment rates in 2020. See the subsequent table for additional details:

Non-Metropolitan, NY Assessment Area - Unemployment Rates					
Area	2016	2017	2018	2019	2020
Assessment Area	5.6%	5.6%	4.8%	4.4%	8.3%
Allegany County, NY	6.4%	6.6%	5.6%	5.3%	8.1%
Cattaraugus County, NY	6.1%	6.2%	5.3%	4.8%	9.4%
Cayuga County, NY	5.1%	5.0%	4.5%	4.1%	7.9%
Chautauqua County, NY	5.9%	6.0%	5.0%	4.5%	8.9%
Genesee County, NY	4.7%	4.8%	4.2%	3.8%	7.4%
Schuyler County, NY	6.1%	5.8%	5.1%	4.5%	8.6%
Seneca County, NY	4.8%	4.5%	3.8%	3.7%	8.2%
Steuben County, NY	5.9%	5.7%	4.9%	4.4%	8.2%
Wyoming County, NY	5.4%	5.6%	4.6%	4.2%	7.5%
Non-MSA New York State	5.5%	5.5%	4.7%	4.4%	8.1%
New York State	4.9%	4.6%	4.1%	3.8%	10.0%

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

According to D&B data, there were 17,692 businesses operating in the assessment area in 2018 of which 4.0% were located in low-income census tracts and 9.3% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.1% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 3.9% were located in low-income geographies and 8.8% were located in moderate-income geographies.

According to D&B data, there were 17,362 businesses operating in the assessment area in 2019 of which 4.1% were located in low-income census tracts and 9.3% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.2% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 4.0% were located in low-income geographies and 8.8% were located in moderate-income geographies.

According to D&B data, there were 17,112 businesses operating in the assessment area in 2020 of which 4.0% were located in low-income census tracts and 9.0% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.5% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 3.9% were located in low-income geographies and 8.6% were located in moderate-income geographies.

Detailed demographic data for the assessment area is provided in the subsequent table.

Assessment Area Demographics								
Non-Metropolitan AA - 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.8	1,650	1.2	790	47.9	27,924	20.5
Moderate-income	12	8.3	10,698	7.8	2,463	23	25,080	18.4
Middle-income	113	78.5	111,557	81.8	10,957	9.8	30,152	22.1
Upper-income	12	8.3	12,545	9.2	602	4.8	53,300	39.1
Unknown-income	3	2.1	6	0	0	0	0	0
Total Assessment	144	100	136,456	100	14,812	10.9	136,456	100
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,660	1,016	0.7	21.8	3,056	65.6	588	12.6
Moderate-income	22,108	9,907	6.5	44.8	8,943	40.5	3,258	14.7
Middle-income	211,329	126,762	83.3	60	44,183	20.9	40,384	19.1
Upper-income	21,909	14,455	9.5	66	4,864	22.2	2,590	11.8
Unknown-income	16	0	0	0	6	37.5	10	62.5
Total Assessment	260,022	152,140	100	58.5	61,052	23.5	46,830	18
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	689	4	591	3.9	94	6.4	4	0.8
Moderate-income	1,532	9	1,297	8.6	207	14.1	28	5.6
Middle-income	13,166	76.9	11,702	77.3	1,036	70.6	428	85.3
Upper-income	1,722	10.1	1,549	10.2	131	8.9	42	8.4
Unknown-income	3	0	3	0	0	0	0	0
Total Assessment	17,112	100	15,142	100	1,468	100	502	100
Percentage of Total Businesses:				88.5		8.6		2.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	27	1.9	26	1.9	0	0	1	33.3
Middle-income	1,263	89.1	1,207	89.1	54	90	2	66.7
Upper-income	127	9	121	8.9	6	10	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment	1,417	100	1,354	100	60	100	3	100
Percentage of Total Farms:				95.6		4.2		0.2

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Five Star's lending activity reflected good responsiveness to the assessment area's credit needs and a substantial majority of loans were made within this assessment area. The bank's performance with regard to 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. Five Star exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses. In addition, the bank was a leader in making community development loans and made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Lending Activity

Five Star's lending activity demonstrated good responsiveness to the retail credit needs of the Non-Metropolitan, NY assessment area, given the bank's capacity to meet assessment area credit needs, overall market conditions, and performance context factors. Five Star originated 431 home purchase, 442 refinance, 69 home improvement, and 967 small business loans during the evaluation period in this assessment area. Five Star ranked first in deposit market share throughout the evaluation period while lending market shares were lower. In 2020, Five Star ranked 6th in HMDA lending out of 215 reporting institutions and ranked 5th in small business lending out of 100 CRA reporting institutions. Volume trends during the evaluation period were similar or exceeded aggregate lending performance over the same period. Volume trends during the evaluation period indicate a 17.4% increase on an annualized basis from the last evaluation and a 104.3% increase in small business lending while overall HMDA lending declined 49.5% mainly due to a change in home improvement reporting requirements. Five Star volume trends were similar to the aggregate lending over the same period with more growth in small business lending but a slightly higher decline in overall HMDA lending.

Geographic Distribution of Loans

Five Star's overall geographic distribution of loans reflected adequate penetration throughout this assessment area. This conclusion was based on the bank's adequate HMDA lending penetration in moderate-income geographies, adequate small business penetration in low-income geographies, and good penetration in moderate-income geographies. Opportunities for HMDA lending in low-income geographies were limited as reflected in the demographics of the assessment area so as a result, the review only evaluated the bank's performance in the moderate-income geographies.

Based on the 2015 ACS, only 0.7% of the available owner-occupied housing units were located within the four low-income geographies in the nine counties included in the Non-Metropolitan, NY assessment area in 2020. The aggregate lending performance further reflected the limited opportunity for HMDA lending. In 2020, combined aggregate of lenders made only 50 HMDA loans in low-income geographies, 51 HMDA loans in 2018, and 47 HMDA loans in 2019. In 2020, for example, Five Star originated one loan in the assessment area, exceeding aggregate lending both in number and dollar volume and thereby supporting the conclusion the loan volume was too insignificant for analysis.

Gap Analysis

Five Star’s responsiveness to meeting the needs of the Non-Metropolitan, NY assessment area was evaluated through an analysis of gaps in lending in LMI census tracts. The overall penetration of tracts of different income levels in this assessment area was good in 2020 at 86.8% of all census tracts when evaluating HMDA and small business lending. In 2020, HMDA and small business lending penetrated 75.0% of low-income census tracts in this assessment area and 91.7% of moderate-income census tracts. Overall penetration of different income levels in 2019 for HMDA and small business lending was adequate at 67.4%, with 25.0% penetration in low-income census tracts and 66.7% in moderate-income census tracts. Five Star’s 2018 performance was comparable to 2019 performance. Weaker penetration was noted in low-income census tracts primarily due to low owner-occupancy rates and a high percentage of vacancies. Business establishments were primarily located in middle-income census tracts. The subsequent chart summarizes the lending gap analysis.

Lending Gap Analysis - Non-Metropolitan, NY Assessment Area			
January 1, 2018 - December 31, 2020			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
2018			
Low	4	2	50.0%
Moderate	12	4	66.7%
Middle	113	29	74.3%
Upper	12	4	66.7%
Income Unknown	3	3	0.0%
Total Tracts	144	42	70.8%
2019			
Low	4	3	25.0%
Moderate	12	4	66.7%
Middle	113	32	71.7%
Upper	12	5	58.3%
Income Unknown	3	3	0.0%
Total Tracts	144	47	67.4%
2020			
Low	4	1	75.0%
Moderate	12	1	91.7%
Middle	113	14	87.6%
Upper	12	0	100.0%
Income Unknown	3	3	0.0%
Total Tracts	144	19	86.8%

Home Purchase Loans

The overall distribution of home purchase loans in moderate-income geographies was good based on poor performance in 2020, excellent performance in 2019, and good performance in 2018.

Five Star's home purchase performance in moderate-income geographies in 2020 was adequate. Five Star originated only one home purchase loan (0.7%) by number and 0.1% by dollar volume in moderate-income geographies compared to 6.5% of owner-occupied housing units located in moderate-income geographies in this assessment area. Five Star's performance was below the aggregate lending which made 6.5% of its home purchase loans by number and 4.2% by dollar volume in moderate-income geographies in 2020. Home purchase lending performance in moderate-income geographies in 2018 and 2019 exceeded 2020's performance as performance was excellent in 2019 and good in 2018.

Refinance Loans

The distribution of refinance loans in moderate-income geographies was poor. In 2020, Five Star made 1.8% by number and 1.1% by dollar volume of its refinance loans in moderate-income census tracts which was below the demographic which indicated 6.5% of owner-occupied housing units were in moderate-income geographies. Performance was also below the aggregate lending which made 3.5% by number and 2.1% by dollar volume of its refinance loans in moderate-income geographies. Refinance lending in 2018 and 2019 was consistent with 2020's poor performance.

Home Improvement Loans

Five Star's home improvement lending performance in moderate-income census tracts was poor based on poor performance in 2019 and 2020 while performance in 2018 was good. In 2019 and 2020, Five Star did not originate any loans in moderate-income census tracts while 6.5% of owner-occupied housing units were located in moderate-income geographies in this assessment area. In 2019, the aggregate lending originated 6.1% by number and 4.2% by dollar volume of its home improvement loans in moderate-income geographies, and in 2020, 3.9% by number and 2.5% by dollar volume. In 2018, Five Star originated two home improvement loans which was 8.0% of its HMDA lending by number and 4.0% by dollar volume, exceeding the aggregate lending which made 4.2% by number and 2.4% by dollar volume and exceeding the market demographic of 6.5%.

Small Business Loans

Five Star's overall small business performance was considered good based on adequate performance in low-income geographies and good performance in moderate-income geographies. The bank's performance in low-income geographies was considered adequate overall based on adequate performance in 2020 and 2018 and poor performance in 2019. In 2020, Five Star originated 2.2% of its small business loans in low-income geographies by number and 1.5% by dollar which was below both the demographic which was 4.0% of all business establishments were in low-income geographies based on 2020 D&B data, and the performance of the aggregate lending which originated 3.6% of its small business loans in low-income geographies by number and 5.8% by dollar volume.

Five Star's small business performance in moderate-income geographies was good based on good performance in 2020 and 2018 and excellent performance in 2019. Performance in 2020 was good as the bank originated 8.3% by number and 10.2% by dollar of its small business loans in moderate-income geographies while 9.0% of all business establishments were in moderate-income geographies based on 2020 D&B data. Small business performance was similar to the aggregate lending which originated 8.7% of its small business loans in moderate-income geographies by number and 10.8% by dollar.

Please refer to Appendix A for the geographic distribution tables of small business loans in the assessment area for 2018 through 2020.

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

Five Star's overall distribution of HMDA, and small business lending was good among borrowers of different income levels and businesses of different sizes. This conclusion was based on good distribution of HMDA loans to low-income borrowers, excellent distribution of HMDA loans to moderate-income borrowers, and good distribution of loans to businesses with GAR of \$1 million or less.

Home Purchase Loans

Five Star's overall distribution of home purchase loans to borrowers of different income levels was excellent based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. Opportunities for home purchase lending to low-income borrowers

was impacted by the number of borrowers that had incomes below the poverty level. In 2020, 20.5% of the families in this assessment area were low-income, but over half of these families had incomes that were below the poverty level. In 2020, Five Star's performance to low-income borrowers was good as Five Star made 11.5% of its home purchase loans by number and 7.6% by dollar volume to low-income borrowers, exceeding the aggregate lending made 7.0% by number and 3.7% by dollar volume but below the assessment area demographic of 20.5%. Performance in 2018 and 2019 was consistent with 2020's performance when Five Star exceeded the aggregate lending but was below the percentage of families that were low-income.

Home purchase lending to moderate-income borrowers was excellent based on Five Star exceeding both the aggregate lending and the percentage of moderate-income families in each year of the review period. In 2020, Five Star made 35.3% of its home purchase loans by number and 30.5% by dollar volume to moderate-income borrowers which exceeded the aggregate lending's home purchase lending to moderate-income borrowers of 21.9% number and 15.3% by dollar volume. Performance in 2018 and 2019 was consistent with 2020, exceeding both the percentage of families that were moderate-income and the aggregate lending.

Refinance Loans

Five Star's overall distribution of refinance loans to borrowers of different income levels was good based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. Refinance performance to low-income borrowers was good in 2020 as Five Star made 5.0% of its refinance loans by number and 2.7% by dollar volume to low-income borrowers, while 20.5% of the families in the assessment area were low-income; however, the bank's performance exceeded the aggregate lending of 4.4% of refinance loans to low-income borrowers by number and 2.2% by dollar volume. Performance in 2019 was similar to that of 2020 while performance in 2018 exceeded the bank's performance in 2020.

Refinance lending to moderate-income borrowers was excellent based on good performance in 2020 and excellent performance in 2018 and 2019. In 2020, Five Star made 17.8% of its refinance loans to moderate-income borrowers by number and 13.9% by dollar volume which was slightly below the 18.4% of families that were moderate-income, but above the aggregate lending's 14.3% by number and 9.0% by dollar volume. Performance in 2018 and 2019 exceeded 2020's performance as refinance lending to moderate-income borrowers exceeded both the percentage of families that were moderate-income and the aggregate lending.

Home Improvement Loans

Five Star's overall distribution of home improvement loans to borrowers of different income levels was good based on good distribution to low- and moderate-income borrowers. Performance in home improvement lending to low-income borrowers was good, based on adequate performance in 2020, good performance in 2019, and excellent performance in 2018. In 2020, 7.4% of its home improvement loans by number and 4.8% by dollar volume were to low-income borrowers, while 20.5% of the families were low-income. Performance was similar to the aggregate lending's performance of 7.8% by number and 4.6% by dollar volume. Home improvement lending to low-income borrowers in 2018 and 2019 exceeded the aggregate lending but performance was below the demographic in 2019 and exceeded the demographic in 2018.

Home improvement lending to moderate-income borrowers was good based on Five Star's excellent performance in home improvement lending in 2020 and 2018. Performance in 2019 was adequate. In 2020, Five Star made 18.5% of its home improvement loans by number and 20.0% by dollar volume to moderate-income borrowers, while 18.4% of the families in the assessment area were moderate-income. Performance exceeded the aggregate lending of 16.1% by number and 11.0% by dollar volume. Performance in 2018 was consistent with 2020's performance while 2019's performance was below.

Small Business Loans

The overall level of lending to small businesses was good as performance consistently exceeded the aggregate lending although below the assessment area demographic. In 2020, according to D&B data, 88.5% of businesses in the assessment area were small businesses with GAR of \$1 million or less. Five Star made 86.7% of its small business loans by number and 70.3% by dollar volume to businesses with GAR of \$1 million or less, exceeding the aggregate lending of 36.9% by number and 25.2% by dollar volume. While the bank's loan volume was below the demographic figure, the bank originated 80.1% of small business loans to assessment area businesses in increments of \$100,000 or less which are typically amounts needed by smaller business entities. Performance in 2018 and 2019 was comparable to 2020's performance as performance was above the aggregate lending.

Please refer to Appendix A for the borrower distribution tables of small business loans in the assessment area for 2018 through 2020.

Community Development Lending

In the Non-Metropolitan, NY assessment area, Five Star was a leader in making qualified community development loans and made use of innovative and/or flexible lending practices in serving the needs of this assessment areas.

The bank made three qualified community development loans totaling \$17.6 million, or 15.5% of Five Star’s total community development. Peer comparisons to other banking institutions in the assessment area indicated that Five Star’s performance compared favorable to its peers in terms of annualized community development loans to deposits by ranking 2nd of 4 peer banks. Five Star’s community development lending primarily addressed affordable housing.

Community Development Loans		
Purpose	#	\$ (,000)
Affordable Housing	2	\$16,427
Economic Development	1	\$1,220
Community Services	0	\$0
Revitalize and Stabilize	0	\$0
Totals	3	\$17,647

Examples of community development lending included:

- A \$4.7 million loan to renovate an affordable housing complex containing 118 units.
- A \$11.7 million loan to finance the construction of a 55-unit affordable housing apartment building. Of the total number of units, three units target renter households earning 30% of the AMI thresholds, 14 units target renter households earning at or below 50% of the AMI thresholds, and 20 units target renter households earning at or below 60% of the AMI thresholds. In addition, housing will be provided to adults with serious mental illness and for the elderly at risk of homelessness.

INVESTMENT TEST

In the Non-Metropolitan, NY assessment area, Five Star made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank made significant use of innovative and complex investments to support community development initiatives. In addition, the bank exhibited good responsiveness to credit and community development needs in this assessment area.

The bank’s community development investments totaled \$19.8 million, or 19.8% of Five Star’s bank-wide community development investments. Five Star ranked 2nd of 3 peer banks in the assessment area in terms of annualized community development investments compared to deposits. The bank acquired \$6.0 million in mortgage-backed securities that were collateralized by mortgages of LMI borrowers. The bank’s investment portfolio also included \$2.7 million in CRA qualified municipal bonds in the assessment area.

Community Development Investments		
Purpose	#	\$ (,000)
Affordable Housing	8	\$17,172
Community Services	26	\$1,806
Economic Development	0	\$0
Revitalize and Stabilize	16	\$861
Totals	50	\$19,839

In addition to the above referenced qualified investments, Five Star made 41 philanthropic grants in this assessment area totaling \$232,700. As indicated in the subsequent table, philanthropic grants primarily targeted community service activities.

Philanthropic Grants				
Community Development Purpose	#	% (#)	\$ (,000)	% (\$)
Affordable Housing	10	24.4%	\$49,500	21.3%
Community Services	26	63.4%	\$160,600	69.0%
Economic Development	5	12.2%	\$22,600	9.7%
Revitalize and Stabilize	0	0%	\$0	0%
Totals	41	100.0%	\$232,700	100.0%

Examples of qualified investments and grants included:

- An investment of \$11.2 million in Low-Income Housing Tax Credits that provided financing for 28 units of affordable housing for veterans at risk of homelessness.
- A \$270,000 investment in municipal bonds for the installation of wastewater treatment plant upgrades located in a moderate-income area.
- Grants totaling \$15,000 to an economic nonprofit organization that provided technical assistance to local startup businesses.

SERVICE TEST

In the Non-Metropolitan, NY assessment area, delivery systems were readily accessible to the bank's geographies and individuals of different income levels in this assessment area. Five Star's record of opening and closings of branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Reasonableness of business hours and services did not vary in a way that inconvenienced this assessment area, particularly LMI geographies and/or LMI individuals. The bank provided an adequate level of community services to this assessment area.

Retail Services

Five Star's delivery systems were readily accessible to the bank's geographies and individuals of differing income levels in its assessment area. Five Star had 20 branches in this assessment area of which three, or 15.0%, were located in LMI census tracts. This compared favorably to the 9.0% of the assessment area's families that resided in LMI census tracts.

Five Star's record of opening and closings of branches in this assessment area did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. During the evaluation period, the bank closed four branches in this assessment area. One of the closed branches was located in a moderate-income census tract; however, Five Star maintained another branch that remained open in the same moderate-income area located approximately a four-minute walk from the closed branch.

The reasonableness of business hours and services Five Star offered in this assessment area did not vary in a way that inconvenienced consumers, particularly those in LMI geographies and/or LMI individuals. All products and services were available at each branch location. Extended weekday hours were offered at each of the branches in the assessment area and 65.0% of the Five Star branches had Saturday lobby hours. Further, each of the three branches located in LMI census tracts had Saturday lobby hours.

Community Development Services

Five Star provided an adequate of community development services in this assessment area. As presented in the subsequent table, Five Star conducted 16 community service events. The services consisted of a variety of events related to the financial education of children and adults and small business technical assistance.

Summary of Community Development Services Non-Metropolitan NY Assessment Area October 1, 2018 – December 31, 2021	
Activity Type	Current Evaluation Total
Financial Education	2
Technical Assistance	2
Small Business Seminars	0
Board Participation	12
TOTAL ACTIVITY	16

Bank officers and staff served on the boards and committees of five community development organizations that provided on-going financial and management expertise and organizations that focused on LMI youth, children in foster care, support for homeless individuals, and supportive housing for at-risk and disabled individuals.

Examples of services included:

- A bank officer served as treasurer on the Board of Directors of a food pantry.
- A bank officer served as a member of the loan committee for a non-profit economic development organization.

METROPOLITAN AREA (FULL REVIEW)

MSA 40380 (Rochester, NY) Assessment Area

DESCRIPTION OF INSTITUTION'S OPERATIONS

As of December 31, 2021, Five Star operated 21 of its 49 branches (42.9%) in the assessment area. These branches generated \$1.5 billion in deposits which accounted for 30.2% of the bank-wide total branch deposits as of June 30, 2021. Of the bank's total HMDA, small business, and small farm loans originated in 2018 through 2020, 37.3% were originated in this assessment area.

Five Star ranked 7th in deposit market share in the assessment area, accounting for 5.9% of all bank's deposits in the assessment area. Lead banks in terms of deposit market share were M&T Bank, KeyBank, JPMorgan Chase Bank, Canandaigua National Bank, Citizens Bank, and Bank of America.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe the assessment area and to evaluate the context in which Five Star operated. Information was obtained from publicly available sources, including the 2010 Census, 2015 ACS, FFIEC, D&B, the New York State Department of Labor, and HUD.

Demographic Characteristics

The MSA 40380 assessment area included Livingston, Monroe, Ontario, Orleans, Wayne, and Yates Counties. The assessment area was comprised of the entire MSA. According to the 2015 ACS, the population of the assessment area was 1,083,156. The assessment area contained 40.3% of the bank's combined assessment area population. The assessment area consisted of 272 census tracts of which 44 or 16.2% were low-income, 44 or 16.2% were moderate-income, 114 or 41.9% were middle-income, 61 or 22.4% were upper-income, and 9 or 3.3% were unknown-income.

Income Characteristics

Based on the 2015 ACS data, the MSA 40380 assessment area had 268,759 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 41.0% were upper-income.

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

MSA 40380 (Rochester, NY) – Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$69,707	\$67,757	-2.80%
Livingston County, NY	\$69,191	\$67,532	-2.40%
Monroe County, NY	\$71,043	\$69,363	-2.37%
Ontario County, NY	\$76,093	\$71,483	-6.06%
Orleans County, NY	\$63,742	\$55,530	-12.88%
Wayne County, NY	\$65,690	\$61,933	-5.72%
Yates County, NY	\$61,567	\$61,588	0.03%
New York State	\$73,401	\$71,913	-2.03%
<small>Source: 2006 – 2010 U.S. Census Bureau American Community Survey 2011 – 2015 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars</small>			

Housing Characteristics:

Based on the 2015 ACS data, the MSA 40380 assessment area had 473,557 housing units of which 61.2% were owner-occupied, 29.7% were rental, and 9.1% were vacant. Of the total housing units, 9.5% were located in low-income tracts, 15.0% in moderate-income tracts, 49.2% in middle-income tracts, 26.2% in upper-income tracts, and 0.1% in unknown-income 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 the assessment area was 52 years old, with 34.0% of the stock built before 1950. According to the 2015 ACS, the median housing value in the assessment area was \$133,481 with an affordability ratio of 39.3. The median gross rent in the assessment area was \$805 per month.

MSA 40380 (Rochester, NY) – Housing Characteristics			
Geographic Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$133,481	39.3	\$805
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
Yates County, NY	\$124,200	39.9	\$688
New York State	\$283,400	20.9	\$1,132

Housing Cost Burden

According to HUD’s Comprehensive Housing Affordability Strategy data, within the assessment area, 49.3% of all rental households had rental costs that exceeded 30% of their incomes, 79.9% of low-income rental households had rental costs that exceeded 30% of their income, and 41.8% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD’s data, within the assessment area, 19.6% of homeowners had housing costs that exceeded 30% of their incomes, 70.6% of low-income homeowners had housing costs that exceeded 30% of their income, and 35.2% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the subsequent table below for more details.

MSA 40380 (Rochester, NY) – Housing Cost Burden						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	79.9%	41.8%	49.3%	70.6%	35.2%	19.6%
Livingston County, NY	79.4%	36.0%	52.0%	68.2%	33.6%	18.9%
Monroe County, NY	81.2%	44.0%	50.1%	71.6%	38.1%	19.8%
Ontario County, NY	76.5%	41.4%	45.0%	68.1%	29.4%	17.1%
Orleans County, NY	74.7%	17.4%	47.1%	72.9%	31.8%	23.8%
Wayne County, NY	70.8%	30.8%	43.9%	67.0%	29.4%	19.4%
Yates County, NY	78.1%	46.6%	49.1%	70.0%	29.5%	20.8%
New York State	77.0%	45.6%	48.4%	73.5%	45.3%	28.2%

*Cost Burden is housing cost that equals 30% or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy.*

Labor, Employment and Economic Characteristics

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.8% in 2016, increased to 4.9% in 2017, decreased to 4.2% in 2018, decreased to 4.0% in 2019, and increased to 8.2% in 2020. The state of New York had an unemployment rate of 4.9% in 2016, decreased to 4.6% in 2017, decreased to 4.1% in 2018, decreased to 3.8% in 2019, and increased to 10.0% in 2020. The COVID-19 pandemic caused businesses to close or reduce their workforce across New York State which drastically increased the unemployment rates in 2020.

MSA 40380 (Rochester, NY) – Unemployment Rates					
Area	2016	2017	2018	2019	2020
Assessment Area	4.8%	4.9%	4.2%	4.0%	8.2%
Livingston County, NY	5.0%	5.0%	4.3%	4.1%	7.1%
Monroe County, NY	4.8%	4.9%	4.2%	4.0%	8.6%
Ontario County, NY	4.4%	4.5%	3.9%	3.7%	7.3%
Orleans County, NY	5.8%	5.9%	4.9%	4.5%	8.4%
Wayne County, NY	5.1%	4.9%	4.1%	3.9%	7.4%
Yates County, NY	4.5%	4.4%	3.8%	3.6%	6.5%
New York State	4.9%	4.6%	4.1%	3.8%	10.0%
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>					

According to D&B data, there were 42,021 businesses operating in the assessment area in 2018 of which 8.6% were located in low-income census tracts and 13.3% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.3% were small businesses with

a gross annual revenue (“GAR”) of \$1 million or less of which 8.1% were located in low-income geographies and 13.0% were located in moderate-income geographies.

According to D&B data, there were 41,898 businesses operating in the assessment area in 2019 of which 8.7% were located in low-income census tracts and 13.4% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.6% were small businesses with a gross annual revenue (“GAR”) of \$1 million or less of which 8.3% were located in low-income geographies and 13.1% were located in moderate-income geographies.

According to D&B data, there were 42,559 businesses operating in the assessment area in 2020 of which 8.7% were located in low-income census tracts and 13.2% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.9% were small businesses with a gross annual revenue (“GAR”) of \$1 million or less of which 8.3% were located in low-income geographies and 13.0% were located in moderate-income geographies.

Additional performance context data for the assessment area is provided in the subsequent MSA 40380 (Rochester, NY) Assessment Area Demographics table.

ASSESSMENT AREA DEMOGRAPHICS								
MSA 40380 (Rochester, NY) AA - 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	44	16.2	20,378	7.6	8,945	43.9	58,942	21.9
Moderate-income	44	16.2	34,370	12.8	6,724	19.6	46,080	17.1
Middle-income	114	41.9	133,537	49.7	9,942	7.4	53,477	19.9
Upper-income	61	22.4	80,369	29.9	2,224	2.8	110,260	41
Unknown-income	9	3.3	105	0	4	3.8	0	0
Total Assessment Area	272	100	268,759	100	27,839	10.4	268,759	100
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	44,930	9,726	3.4	21.6	27,773	61.8	7,431	16.5
Moderate-income	71,159	32,781	11.3	46.1	30,673	43.1	7,705	10.8
Middle-income	233,103	154,219	53.2	66.2	56,077	24.1	22,807	9.8
Upper-income	124,078	93,238	32.1	75.1	25,715	20.7	5,125	4.1
Unknown-income	287	68	0	23.7	189	65.9	30	10.5
Total Assessment Area	473,557	290,032	100	61.2	140,427	29.7	43,098	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,718	8.7	3,164	8.3	526	13.7	28	6
Moderate-income	5,633	13.2	4,961	13	616	16.1	56	12.1
Middle-income	19,487	45.8	17,554	45.9	1,667	43.5	266	57.3
Upper-income	13,654	32.1	12,544	32.8	996	26	114	24.6
Unknown-income	67	0.2	44	0.1	23	0.6	0	0
Total Assessment Area	42,559	100	38,267	100	3,828	100	464	100
Percentage of Total Businesses:			89.9		9		1.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	7	0.6	7	0.6	0	0	0	0
Moderate-income	81	6.9	74	6.6	7	11.9	0	0
Middle-income	921	78.3	872	78.1	48	81.4	1	100
Upper-income	167	14.2	163	14.6	4	6.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,176	100	1,116	100	59	100	1	100
Percentage of Total Farms:			94.9		5		0.1	

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

In the MSA 40380 (Rochester, NY) assessment area, Five Star's lending activity reflected good responsiveness to this assessment area's credit needs and a substantial majority of loans were made within this assessment area. The bank's geographic distribution of loans reflected good penetration throughout the assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among individuals of different income levels and businesses of different sizes. Five Star exhibited a good record of serving low-income individuals and areas and very small businesses. The bank was a leader in making community development loans and made use of innovative and flexible lending practices in serving assessment area credit needs.

Lending Activity

Five Star's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area, given the bank's capacity to meet assessment area credit needs, overall market conditions, and performance context factors. Five Star originated 796 home purchase, 415 refinance, 71 home improvement, and 1,172 small business loans during the evaluation period in this assessment area. Five Star ranked 7th in deposit market share throughout the evaluation period while lending market shares were generally lower. In 2020, Five Star ranked 16th in HMDA lending out of 267 reporting institutions and ranked 9th in small business lending out of 150 CRA reporting institutions. Volume trends during the evaluation period were similar or exceeded aggregate lending performance over the same period. Volume trends during the evaluation period indicated a 4.3% increase on an annualized basis from the last evaluation due to a 43.1% increase in small business lending, a 116.4% increase in home purchase lending, a decline of 41.6% in home refinances, and an 84.8% decline in home improvement lending. Five Star volume trends exceeded aggregate lending on an annualized basis with more growth in home purchase and small business lending.

Geographic Distribution of Loans

Five Star's overall geographic distribution of loans reflected good penetration throughout the assessment area. This lending performance was based on adequate penetration by the bank in low-income geographies and good lending penetration in moderate-income geographies.

Gap Analysis

Five Star’s responsiveness to meeting the needs of the MSA 40380 (Rochester, NY) assessment area was evaluated through an analysis of gaps in lending in LMI census tracts. The overall penetration of tracts of different income levels in this assessment area was good in 2020 at 84.2% of all census tracts when evaluating HMDA and small business lending. In 2020, HMDA and small lending penetrated 63.6% of low-income census tracts and 88.6% of moderate-income census tracts. Overall penetration in 2019 was adequate at 72.8%, with 50.0% penetration in low-income census tracts and 77.3% in moderate-income census tracts. Five Star’s 2018 performance was below the 2019 performance. Weaker penetration was noted in low-income census tracts primarily due to low owner-occupancy rates. According to the 2015 ACS, 61.8% all housing units were rental properties; therefore, limiting opportunities for HMDA lending. The subsequent chart summarizes the lending gap analysis.

Lending Gap Analysis - MSA 40380 (Rochester, NY) Assessment Area			
January 1, 2018 - December 31, 2020			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
2018			
Low	44	27	38.6%
Moderate	44	16	63.6%
Middle	114	30	73.7%
Upper	61	15	75.4%
Income Unknown	9	9	0.0%
Total Tracts	272	97	64.3%
2019			
Low	44	22	50.0%
Moderate	44	10	77.3%
Middle	114	16	86.0%
Upper	61	17	72.1%
Income Unknown	9	9	0.0%
Total Tracts	272	74	72.8%
2020			
Low	44	16	63.6%
Moderate	44	5	88.6%
Middle	114	11	90.4%
Upper	61	3	95.1%
Income Unknown	9	8	11.1%
Total Tracts	272	43	84.2%

Home Purchase Loans

Five Star’s overall home purchase lending distribution was excellent based on excellent performance in both low- and moderate-income geographies. Performance in low-income geographies was excellent in all three years. Home purchase performance in 2020 exceeded both the demographic and aggregate lending when Five Star originated 9.8% by number and 5.5% by

dollar volume of all home purchase loans in low-income geographies. This compared favorably to the 3.4% of owner-occupied housing units located in low-income geographies and aggregate lending which made 3.3% by number and 1.8% by dollar volume in low-income geographies. Performance in 2018 and 2019 was comparable to 2020's performance.

Five Star's performance in moderate-income geographies was excellent based on excellent performance in all three years. In 2020, Five Star made 29.7% of its home purchase loans in moderate-income geographies by number and 24.7% by dollar volume, where 11.3% of all owner-occupied housing units were located. Five Star's performance was above the aggregate lending which made 12.1% of its home purchase loans by number and 7.7% by dollar volume in moderate-income geographies. Home purchase performance exceeded the demographic and aggregate lending in all three years.

Refinance Loans

Five Star's performance in refinance lending was adequate based on poor performance in low-income geographies and good performance in moderate-income geographies. Opportunities for HMDA lending in low-income census tracts were impacted by a poverty rate of 43.9%. Additionally, 61.8% of all housing units were rental properties. Five Star made 0.8% by number and 0.5% by dollar of its refinance loans in low-income geographies in 2020. Performance was both below the demographics of the assessment area where 3.4% of all owner-occupied were located and the aggregate lending which made 1.4% by number and 1.0% by dollar of it is refinance loans in low-income geographies. Five Star's performance in 2018 and 2019 was comparable to 2020's performance.

Five Star's performance in moderate-income geographies was good based on good performance in 2019 and 2020, and poor performance in 2018. In 2020, Five Star made 7.2% by number and 6.2% by dollar volume of its refinance loans in moderate-income geographies where 11.3% of all owner-occupied housing units were located. Five Star's performance was above the aggregate lending which made 5.8% of its refinance loans by number and 3.8% by dollar in moderate-income geographies. Refinance performance in 2019 exceeded 2020's performance while 2018's performance was below 2020's performance.

Home Improvement Loans

Five Star's home improvement lending performance in low- and moderate-income geographies was adequate based on poor performance in low-income geographies and adequate performance

in moderate-income geographies. Five Star did not make home improvement loans in low-income geographies in 2018 and 2020 and made one loan in 2019. Opportunities for HMDA lending in low-income census tracts were impacted by a poverty rate of 43.9% based on the 2015 ACS. Additionally, 61.8% of all housing units were rental properties; therefore, limiting opportunities for HMDA lending. Performance was below the demographics of the assessment area where, 3.4% of all owner-occupied were located. Performance was also below the aggregate lending which made 2.0% (45 loans) of its home improvement loans in low-income geographies in 2020.

Five Star's home improvement performance in moderate-income geographies in 2020 was adequate. Five Star made 6.1% by number and 5.8% by dollar volume of its home improvement loans in moderate-income geographies where 11.3% of all owner-occupied housing units were located. Five Star's performance was below the aggregate lending which made 7.9% by number and 5.3% by dollar volume of its home improvement loans in moderate-income geographies. Home improvement performance in 2018 and 2019 exceeded 2020's performance.

Small Business Loans

Small business performance for Five Star was good overall based on adequate performance in low-income geographies and excellent performance in moderate-income geographies. In 2020, the bank's performance in low-income geographies was adequate as Five Star originated 4.9% of its small business loans by number and 9.5% by dollar volume in low-income geographies compared to the demographics of the assessment area where 8.7% of small businesses operated. Small business performance was also below the performance of the aggregate lending which made 8.1% of its small business loans by number and 9.9% by dollar volume in low-income geographies. Performance in 2018 and 2019 was below 2020's performance.

Five Star's overall performance in moderate-income geographies was excellent based on excellent performance in 2019 and 2020, and good performance in 2018. In 2020, Five Star's small business performance in moderate-income geographies was excellent as Five Star originated 14.5% of its small business loans in moderate-income geographies by number and 11.0% by dollar volume. Performance was similar to the demographics of the assessment area where 13.2% of small businesses operated. Small business performance in moderate-income geographies was also above the aggregate lending's 10.9% of small business loans by number and 12.2% by dollar volume. Performance in 2019 was comparable to 2020's performance while performance in 2018 was slightly below 2020's performance.

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

Five Star's overall distribution of HMDA and small business lending was good among borrowers of different income levels and businesses of different sizes. This conclusion was based on good distribution of HMDA loans to low-income borrowers and to small businesses and excellent distribution of HMDA loans to moderate-income borrowers.

Home Purchase Loans

Five Star's overall distribution of home purchase loans to borrowers of different income levels was excellent based on excellent distribution to low- and moderate-income borrowers. Five Star's performance excelled despite the number of borrowers within the assessment area that had incomes below the poverty level. In 2020, 21.9% of the families in this assessment area were low-income, but over half of these families had incomes that were below the poverty level. In 2020, Five Star's performance to low-income borrowers was excellent as it made 31.3% of its home purchase loans by number and 22.3% by dollar volume to low-income borrowers. Performance was above the aggregate lending which made 9.5% by number and 5.2% by dollar volume to low-income borrowers. Performance in 2018 and 2019 also exceeded the both the 2018 and 2019 percentage of families that were low-income and the aggregate lending's performance.

Home purchase lending to moderate-income borrowers was excellent based on Five Star exceeding both the aggregate lending and the percentage of moderate-income families in each year of the review period. In 2020, Five Star made 37.0% of its home purchase loans by number and 34.6% by dollar volume to moderate-income borrowers while exceeding the aggregate lending of 22.9% number and 17.3% by dollar volume. Performance also exceeded the demographic of 17.1% of families being of moderate-income. Five Star's performance in 2018 and 2019 was also excellent as performance exceeded the 2018 and 2019 demographic and the aggregate lending.

Refinance Loans

Five Star's overall distribution of refinance loans to borrowers of different income levels was good based on adequate distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2020, Five Star's performance to low-income borrowers was adequate as Five Star made 5.2% of its refinance loans by number and 2.4% by dollar volume to low-income borrowers, while 21.9% of the families in the assessment area were low-income. Performance was similar to the aggregate lending of 4.9% of refinance loans to low-income borrowers by number and 2.5% by dollar volume. Performance in 2019 was comparable to 2020's performance while 2018's performance exceeded 2020's performance in comparison to the demographic and

aggregate lending.

Refinance lending to moderate-income borrowers was excellent based on Five Star exceeding both the aggregate lending and the percentage of moderate-income families within the assessment in each year of the review period. In 2020, Five Star made 22.1% of its refinance loans by number and 14.8% by dollar volume to moderate-income borrowers while 17.1% of the families in the assessment area were moderate-income. Performance exceeded the aggregate lending of 15.0% of refinance loans to moderate-income borrowers by number and 9.5% by dollar volume. Five Star's performance in 2018 and 2019 was comparable to 2020's performance.

Home Improvement Loans

Five Star's overall distribution of home improvement loans to borrowers of different income levels was good based on good distribution to both low- and moderate-income borrowers. In 2020, 6.1% of its home improvement loans by number and 4.1% by dollar volume were to low-income borrowers, with 21.9% of the families were low-income. Performance was below the aggregate lending's performance of 7.4% by number and 5.5% by dollar volume. Performance in 2019 exceeded the demographic and the aggregate lending and performance in 2018 was below the demographic but exceeded the aggregate lending.

Home improvement lending to moderate-income borrowers was good based on Five Star's meeting or exceeding the percentage of moderate-income families and aggregate lending in 2018 and 2020 but below the percentage of moderate-income families and the aggregate lending in 2019. In 2020, Five Star made 30.3% of its home improvement loans by number and 22.1% by dollar volume to moderate-income borrowers, while 17.1% of the families in this assessment area were moderate-income. Performance exceeded the aggregate lending performance of 19.0% by number and 13.6% by dollar volume. Performance in 2018 was comparable while 2019 was below 2020's performance.

Small Business Loans

The overall level of lending to small businesses was good based on consistently exceeding the aggregate lending and being comparable to the assessment area demographic. In 2020, according to D&B data, 89.9% of businesses in this assessment area were small businesses with GAR of \$1 million or less, a percentage that was comparable to Five Star's performance of 83.1% of loans, by number, originated in this assessment area. The bank's performance compared to the demographic in 2018 and 2019 was similar to its performance in 2020. In 2020, Five Star made 83.1% of its small business loans by number and 64.5% by dollar volume those businesses, substantially exceeding the aggregate lending of 33.4% by number and 21.6% by dollar volume to small businesses. Five Star's performance in 2018 and 2019 also exceeded the aggregate lending.

In 2020, of the originated small business loans in this assessment area, 76.4% were in increments of \$100,000 or less which were typically amounts needed by smaller business entities. In 2019, 70.6% were in increments of \$100,000 or less, and 78.9% in 2018.

Community Development Lending

In the MSA 40380 (Rochester, NY) assessment area, Five Star was a leader in making qualified community development loans and made use of innovative and/or flexible lending practices in serving the needs of this assessment areas.

The bank made 13 qualified community development loans totaling \$50.1 million, or 44.0% of Five Star’s total community development lending. Peer comparisons with other banking institutions in the assessment area indicated that Five Star ranked 4th of 5 peer banks in terms of annualized community development lending to deposits. Community development loans were concentrated in the areas of affordable housing and economic development, as noted in the table.

Community Development Loans		
Purpose	#	\$ (,000)
Affordable Housing	5	\$22,889
Community Services	2	\$7,675
Economic Development	6	\$19,586
Revitalize and Stabilize	0	\$0
Totals	13	\$50,150

Examples of community development lending included:

- A \$6.3 million loan to finance construction for 40 units of affordable housing, with 10 units reserved for adults with serious mental illness and 10 units reserved for elderly at risk for homelessness.
- A \$4.1 million loan to finance construction of a 29 unit mixed-use affordable housing project in Rochester.
- A \$8.2 million loan to renovate a building in a moderate-income census tract for a community center and medical facility.

INVESTMENT TEST

In the MSA 40380 (Rochester, NY) assessment area, Five Star made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank made significant use of

innovative and complex investments to support community development initiatives. In addition, the bank exhibited good responsiveness to credit and community development needs in this assessment area.

The bank’s community development investments in this assessment area totaled \$58.0 million, or 57.8% of Five Star’s bank-wide community development investments. Peer comparisons with other banking institutions in the assessment area evidenced that Five Star’s

Community Development Investments		
Purpose	#	\$ (,000)
Affordable Housing	16	\$43,648
Community Services	6	\$1,242
Economic Development	0	\$0
Revitalize and Stabilize	8	\$13,070
Totals	30	\$57,960

performance exceeded the peer banks in terms of annualized community development investments to deposits by ranking 1st of 6 peer banks. The bank’s community development investments were concentrated in affordable housing. The bank invested \$31.2 million in Low-Income Housing Tax Credits that supported the development of affordable housing and \$12.4 million in mortgage-backed securities that were collateralized by mortgages from LMI borrowers.

In addition to the above referenced qualified investments, Five Star made 91 grants and donations in this assessment area totaling \$639,618. As indicated in the subsequent table, grants and donations primarily targeted community service activities.

Philanthropic Grants				
Community Development Purpose	#	% (#)	\$ (,000)	% (\$)
Affordable Housing	14	15.4%	\$110,000	17.2%
Community Services	60	65.9%	\$418,618	65.4%
Economic Development	17	18.7%	\$111,000	17.4%
Revitalize and Stabilize	0	0%	\$0	0%
Totals	91	100.0%	\$639,618	100.0%

Examples of qualified investments and grants included:

- Investments totaling \$31.2 million in Low-Income Housing Tax Credits supported 11 units of affordable housing that benefited veterans at risk of homelessness, adults with serious mental illnesses, and people living with HIV.
- An investment of \$38,360 in a municipal bond that supported a water district construction

project in an LMI area.

- An investment of \$12.5 million in a fund supporting the creation of permanent LMI jobs in Rochester.
- Grants totaling \$27,000 to a community development financial institution providing financing to small businesses that were currently un-bankable because they were start-ups or were under-collateralized. The small business financing was accompanied by technical assistance and mentorship opportunities.

SERVICE TEST

In MSA 40380 (Rochester, NY) assessment area, delivery systems were accessible to the bank's geographies and individuals of different income levels in this assessment area. Five Star's record of opening and closings 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 this assessment area, particularly to LMI geographies and/or LMI individuals. The bank was a leader in providing community development services to this assessment area.

Retail Services

Five Star's delivery systems were accessible to the bank's geographies and individuals of different income levels in this assessment area. Five Star operated 21 branches in this assessment area of which five, or 23.8%, were located in LMI geographies. This compared favorably to the 20.4% of the assessment area's families that resided in LMI tracts.

Five Star's record of opening and closings of branches in this assessment area did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. During the evaluation period, Five Star closed three branches in moderate-income geographies, one of which was located in this assessment area. However, the bank maintained four ATMs within a one-mile radius of the closed branch. Two of the four ATMs, one full-service ATM that was 0.2 miles from the closed branch and one cash-only ATM that was 0.8 miles from the closed branch, were located in moderate-income census tracts. Two additional ATMs, one full-service ATM being 1.4 miles and one cash-only being 0.9 miles away, were located in middle-income census tracts.

The services Five Star offered in this assessment area did not vary in a way that inconvenienced consumers, particularly to LMI geographies and/or LMI individuals. All products and services

were available at each branch location. Each of Five Star's branches had extended weekday hours and 47.6% of branches had Saturday hours. Two of the five branches (40.0%) located in a LMI tracts had Saturday hours.

Community Development Services

Five Star was a leader in providing community development services in this assessment area. As presented in the table below, Five Star conducted 75 community service events. The services consisted of a wide variety of events related to the financial education of children and adults, small business technical assistance, and participation with organizations promoting economic development and workforce training.

Summary of Community Development Services MSA 40380 (Rochester, NY) Assessment Area October 1, 2018 – December 31, 2021	
Activity Type	Current Evaluation Total
Financial Education	55
Technical Assistance	4
Small Business Seminars	0
Board Participation	16
TOTAL ACTIVITY	75

Bank officers and senior staff also served on the boards and committees of 14 community development organizations that provided on-going financial and management expertise, and organizations focused on LMI youth, children in foster care, support for homeless individuals, and supportive housing for at-risk and disabled individuals. In two instances, more than one bank employee served on the same board of directors.

Examples of services included:

- A bank officer served on the Board of Directors and was a member of the Finance Committee for Flower City Habitat for Humanity.
- A bank officer was a member of the Board of Directors of the Boys and Girls Club of Rochester.
- A bank officer served on the Board of Directors and was a member of the Loan Committee for The Enterprise Center at PathStone.

METROPOLITAN AREA (FULL REVIEW)

MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area

DESCRIPTION OF INSTITUTION'S OPERATIONS

As of December 31, 2021, Five Star operated 6 of 49 branches (12.2%) in the assessment area. These branches generated \$234.1 million in deposits which accounted for 4.8% of the bank-wide total branch deposits as of June 30, 2021. Of the bank's total HMDA, small business, and small farm loans originated in 2018 through 2020, 27.8% were originated in the assessment area.

Five Star ranked 11th in deposit market share, accounting for 0.4% of all bank's deposits in this assessment area. Lead banks in terms of deposit market share were M&T Bank, KeyBank, HSBC Bank USA, Bank of America, Citizens Bank, and Northwest Bank.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe this assessment area and to evaluate the context in which Five Star operated. Information was obtained from publicly available sources including the 2010 Census, 2015 ACS, FFIEC, D&B, the New York State Department of Labor, and HUD.

Demographic Characteristics

The MSA 15380 (Buffalo-Cheektowaga, NY) assessment area included Erie County. The assessment area did not include the entire MSA, as it excluded Niagara County. According to the 2015 ACS, the population of the assessment area was 921,584. The assessment area consisted of 237 census tracts of which 38 or 16.0% were low-income, 41 or 17.3% were moderate-income, 90 or 38.0% were middle-income, 60 or 25.3% were upper-income, and 8 or 3.4% were unknown-income.

Income Characteristics

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

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

MSA 15380 (Buffalo-Cheektowaga, NY) - Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$69,044	\$67,607	-2.08%
MSA 15380 Buffalo-Cheektowaga, NY	\$68,092	\$67,108	-1.45%
New York State	\$73,401	\$71,913	-2.03%
<small>Source: 2006 - 2010 U.S. Census Bureau American Community Survey 2011 - 2015 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</small>			

Housing Characteristics

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

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

MSA 15380 (Buffalo-Cheektowaga, NY) – Housing Characteristics			
Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$130,015	39.5	\$739
MSA 15380 Buffalo-Cheektowaga, NY	\$125,014	40.8	\$725
New York State	\$283,400	20.9	\$1,132

Housing Cost Burden

According to HUD's Comprehensive Housing Affordability Strategy data, within the assessment area, 44.4% of all rental households had rental costs that exceeded 30% of their incomes, 75.8% of low-income rental households had rental costs that exceeded 30% of their income, and 32.2% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within the assessment area, 17.8% of homeowners had housing costs that exceeded 30% of their incomes, 63.8% of low-income homeowners had housing costs that exceeded 30% of their income, and 30.3% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the subsequent table for more details.

MSA 15380 (Buffalo-Cheektowaga, NY) - Housing Cost Burden						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	75.8%	32.2%	44.4%	63.8%	30.3%	17.8%
MSA 15380 Buffalo-Cheektowaga, NY	75.1%	30.3%	44.3%	64.3%	30.1%	18.0%
New York State	77.0%	45.6%	48.4%	73.5%	45.3%	28.2%
<small>Cost Burden is housing cost that equals 30% or more of household income Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy</small>						

Labor, Employment and Economic Characteristics

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 5.0% in 2016, increased to 5.1% in 2017, decreased to 4.4% in 2018, decreased to 4.1% in 2019, and increased to 9.5% in 2020. The State of New York had an unemployment rate of 4.9% in 2016, decreased to 4.6% in 2017, decreased to 4.1% in 2018, decreased to 3.8% in 2019, and increased to 10.0% in 2020. The COVID-19 pandemic caused businesses to close or reduce their workforce across New York State which drastically increased the unemployment rates in 2020.

MSA 15380 (Buffalo-Cheektowaga, NY) - Unemployment Rates					
Area	2016	2017	2018	2019	2020
Assessment Area	5.0%	5.1%	4.4%	4.1%	9.5%
MSA 15380 Buffalo-Cheektowaga, NY	5.2%	5.3%	4.6%	4.2%	9.7%
New York State	4.9%	4.6%	4.1%	3.8%	10.0%
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>					

According to D&B data, there were 37,420 businesses operating in the assessment area in 2018 of which 9.0% were located in low-income census tracts and 10.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.5% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 8.6% were located in low-income geographies and 10.6% were located in moderate-income geographies.

According to D&B data, there were 36,752 businesses operating in the assessment area in 2019 of which 9.2% were located in low-income census tracts and 11.0% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.6% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 8.8% were located in low-income geographies and 10.8% were located in moderate-income geographies.

According to D&B data, there were 36,560 businesses operating in the assessment area in 2020 of which 9.4% were located in low-income census tracts and 10.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.9% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 9.0% were located in low-income geographies and 10.6% were located in moderate-income geographies.

The subsequent table provides a summary of the Assessment Area Demographics for MSA 15380 (Buffalo-Cheektowaga, NY):

ASSESSMENT AREA DEMOGRAPHICS									
MSA 15380 (Buffalo-Cheektowaga, NY) AA - 2020									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	38	16	28,377	12.3	11,024	38.8	50,917	22.1	
Moderate-income	41	17.3	29,041	12.6	5,278	18.2	37,837	16.5	
Middle-income	90	38	88,563	38.5	6,357	7.2	45,650	19.9	
Upper-income	60	25.3	83,808	36.4	2,415	2.9	95,553	41.6	
Unknown-income	8	3.4	168	0.1	55	32.7	0	0	
Total Assessment Area	237	100	229,957	100	25,129	10.9	229,957	100	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	63,564	18,364	7.4	28.9	33,158	52.2	12,042	18.9	
Moderate-income	62,212	27,805	11.2	44.7	25,794	41.5	8,613	13.8	
Middle-income	162,784	104,051	41.8	63.9	47,976	29.5	10,757	6.6	
Upper-income	131,298	98,622	39.6	75.1	26,380	20.1	6,296	4.8	
Unknown-income	924	47	0	5.1	649	70.2	228	24.7	
Total Assessment Area	420,782	248,889	100	59.1	133,957	31.8	37,936	9	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	3,440	9.4	2,934	9	488	13.2	18	5	
Moderate-income	3,961	10.8	3,460	10.6	472	12.7	29	8.1	
Middle-income	12,876	35.2	11,453	35.2	1,278	34.5	145	40.4	
Upper-income	14,848	40.6	13,486	41.5	1,209	32.6	153	42.6	
Unknown-income	1,435	3.9	1,165	3.6	256	6.9	14	3.9	
Total Assessment Area	36,560	100	32,498	100	3,703	100	359	100	
Percentage of Total Businesses:				88.9		10.1		1	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	18	4.4	18	4.7	0	0	0	0	
Moderate-income	12	3	10	2.6	2	11.1	0	0	
Middle-income	188	46.3	181	46.8	7	38.9	0	0	
Upper-income	182	44.8	172	44.4	9	50	1	100	
Unknown-income	6	1.5	6	1.6	0	0	0	0	
Total Assessment Area	406	100	387	100	18	100	1	100	
Percentage of Total Farms:				95.3		4.4		0.2	

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

In the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area, Five Star's lending activity reflected good responsiveness to the assessment area's credit needs and a substantial majority of loans were made within this assessment area. The bank's geographic distribution of loans reflected good penetration throughout the assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among individuals of different income levels and businesses of different sizes. The bank exhibited a good record of serving low-income individuals and areas and very small businesses. In addition, the bank was a leader in making community development loans and made use of innovative and flexible lending practices in serving assessment area credit needs.

The geographic distribution and borrower distribution of small farm lending was not evaluated, as the volume was insufficient to obtain meaningful conclusions.

Lending Activity

Five Star's lending activity demonstrated good responsiveness to the retail credit needs of the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area, given the bank's capacity to meet assessment area credit needs, overall market conditions, and performance context factors. Overall, Five Star originated 1,171 home purchase, 294 refinance, 35 home improvement, and 383 small business loans during the evaluation period in this assessment area. Five Star ranked 11th in deposit market share throughout the evaluation period while lending market shares were lower. In 2020, Five Star ranked 15th in HMDA lending out of 251 reporting institutions and ranked 15th in small business lending out of 130 CRA reporting institutions. Volume trends during the evaluation period were similar or exceeded aggregate lending performance over the same period.

Geographic Distribution of Loans

Five Star's overall geographic distribution of loans reflected good penetration throughout the assessment area. This lending performance was based on good HMDA and good small business penetration by the bank in LMI geographies. The rating also considered an analysis of gaps in lending, which indicated that during the evaluation period, Five Star had adequate HMDA and small business loan penetration by originating loans on a consolidated basis in 86.5% of the census tracts within the assessment area in 2020, 76.4% in 2019, and 75.9% in 2018. Opportunities for

HMDA lending in low-income census tracts were impacted by a poverty rate of 38.8% based on the 2015 ACS. Additionally, according to the 2015 ACS, 52.2% of all housing units were rental properties; therefore, limiting opportunities for HMDA lending.

Gap Analysis

Five Star’s responsiveness to meeting the needs of the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area was evaluated through an analysis of gaps in lending in LMI census tracts. The overall penetration of tracts of different income levels in this assessment area was good in 2020 at 86.5% of all census tracts when evaluating HMDA and small business lending. In 2020, HMDA and small lending penetrated 76.3% of low-income census tracts and 80.5% of moderate-income census tracts. Overall penetration in 2019 was adequate at 75.5%, with 55.3% penetration in low-income census tracts and 68.3% in moderate-income census tracts. Five Star’s 2018 performance was comparable to the 2019 performance. Weaker penetration was noted in low-income census tracts primarily due to low owner-occupancy rates. The subsequent chart summarizes the lending gap analysis.

Lending Gap Analysis - MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area			
January 1, 2018 - December 31, 2020			
Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
2018			
Low	38	16	57.9%
Moderate	41	8	80.5%
Middle	90	20	77.8%
Upper	60	7	88.3%
Income Unknown	8	7	12.5%
Total Tracts	237	58	75.5%
2019			
Low	38	17	55.3%
Moderate	41	13	68.3%
Middle	90	13	85.6%
Upper	60	8	86.7%
Income Unknown	8	7	12.5%
Total Tracts	237	58	75.5%
2020			
Low	38	9	76.3%
Moderate	41	8	80.5%
Middle	90	7	92.2%
Upper	60	2	96.7%
Income Unknown	8	6	25.0%
Total Tracts	237	32	86.5%

Home Purchase Loans

Five Star's overall home purchase lending distribution was excellent based on excellent performance in both low- and moderate-income geographies. Performance in low-income geographies was excellent in 2020 as performance exceeded both the demographic and aggregate lending when Five Star originated 12.5% by number and 7.9% by dollar volume of all home purchase loans in low-income geographies. This exceeded the 7.4% of owner-occupied housing units located in low-income geographies and the aggregate lending which made 5.0% by number and 3.0% by dollar volume in low-income geographies. Performance in 2018 and 2019 was comparable to 2020's performance.

Five Star's performance in moderate-income geographies was excellent based on excellent performance in 2018, 2019, and 2020. In 2020, Five Star made 12.2% of its home purchase loans in moderate-income geographies by number and 10.0% by dollar volume where, according to the 2015 ACS, 11.2% of all owner-occupied housing units were located. Five Star's performance was above the aggregate lending which made 9.8% of its home purchase loans by number and 6.8% by dollar volume in moderate-income geographies. Home purchase performance in 2018 and 2019 was comparable to 2020's performance.

Refinance Loans

Five Star's performance in refinance lending was good overall based on good performance in low-income geographies and adequate performance in moderate-income geographies. Opportunities for HMDA lending in low-income census tracts were impacted by a poverty rate of 38.8% based on the 2015 ACS. Additionally, 52.2% of all housing units were rental properties thereby limiting opportunities for HMDA lending. In 2020, Five Star made 6.6% by number and 3.9% by dollar volume of its refinance loans in low-income geographies. Performance was below the demographics of this assessment area where, according to the 2015 ACS, 7.4% of all owner-occupied were located and above the aggregate lending which made 2.3% by number and 1.4% by dollar of its refinance loans in low-income geographies. Five Star's performance in 2019 exceeded 2020's performance while 2018's performance was below 2020's performance.

Five Star's performance in moderate-income geographies was adequate based on adequate performance in 2018, 2019, and 2020. In 2020, Five Star made 4.1% by number and 3.9% by dollar volume of its refinance loans in moderate-income geographies where, according to the 2015 ACS, 11.2% of all owner-occupied housing units were located. Five Star's performance was similar to the aggregate lending which made 5.6% of its refinance loans by number and 3.6% by

dollar in moderate-income geographies. Refinance performance in 2018 was below 2020's performance and in 2019 exceeded 2020's performance.

Home Improvement Loans

Five Star's home improvement lending performance in low- and moderate-income geographies was good based on good performance in both low- and moderate-income geographies. Performance in low-income geographies was good in 2020 when Five Star made 13.6% by number and 12.2% by dollar volume in low-income geographies, exceeding the assessment area demographic of 7.4% of all owner-occupied housing units being located in low-income tracts, and also exceeding the aggregate lending which made 5.5% by number and 4.3% by dollar volume. Performance in 2019 was good as the bank substantially exceeded the aggregate lending; however, this performance was based on one home improvement loan originated in a low-income geography. In 2018, Five Star made no home improvement loans in low-income geographies in this assessment area. Opportunities for HMDA lending in low-income census tracts were impacted by a poverty rate of 38.8%. Additionally, 53.2% of all housing units were rental properties thereby limiting opportunities for HMDA lending.

Five Star's home improvement performance in moderate-income geographies was good based on good performance in 2020, excellent performance in 2019, and poor performance in 2018 when Five Star did not make any home improvement loans. According to the 2015 ACS, 11.2% of all owner-occupied housing units were in moderate-income geographies. In 2020, Five Star's performance was above the aggregate lending when Five Star made 9.1% by number and 7.7% by dollar volume in moderate-income geographies compared to the aggregate lending's 8.3% by number and 7.0% by dollar volume. Home improvement performance in 2019 was comparable to 2020's performance while performance in 2018 was below 2020's performance.

Small Business Loans

Small business performance for Five Star was good overall based on good performance in both low- and moderate-income geographies. Five Star's overall performance in low-income geographies was considered good based on good performance in 2019 and 2020 and excellent performance in 2018. In 2020, Five Star's performance in low-income geographies was good as Five Star originated 8.5% of its small business loans by number and 13.3% by dollar volume which was comparable to the assessment area demographic where 9.4% of small businesses operated, and comparable to the performance of the aggregate lending which made 9.3% by number and 10.2% by dollar volume. Performance in 2019 was comparable to 2020 while 2018's performance

exceeded both the assessment area demographic and the aggregate lending.

Five Star's overall performance in moderate-income geographies was good. In 2020, Five Star's small business performance was excellent when Five Star originated 12.0% of its small business loans by number and 19.3% by dollar volume, exceeding aggregate lending's 9.6% by number and 10.9% by dollar volume, and exceeding to the assessment area demographic where 10.8% of small businesses operated. Performance in 2018 was comparable to the Five Star's excellent performance in 2020 while 2019's performance was adequate.

Please refer to Appendix A for the geographic distribution tables in the assessment area for 2018 through 2020.

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

Five Star's overall distribution of HMDA and small business lending was good among borrowers of different income levels and businesses of different sizes. This conclusion was based on good distribution of HMDA loans to low-income borrowers, excellent distribution of HMDA loans to moderate-income borrowers, and good distribution to small businesses.

Home Purchase Loans

Five Star's overall distribution of home purchase loans to borrowers of different income levels was good based on good distribution to low-income borrowers and excellent distribution to moderate-income borrower. Opportunities for home purchase lending to low-income borrowers was impacted by the number of borrowers that had incomes below the poverty level. In 2020, 22.1% of the families in this assessment area were low-income; however, slightly less than half of these families had incomes that were below the poverty level. In 2020, Five Star made 19.2% of its home purchase loans by number and 12.0% by dollar volume to low-income borrowers which exceeded the aggregate lending of 7.8% by number and 4.5% by dollar volume. Performance in 2018 and 2019 was comparable to 2020's performance.

Home purchase lending to moderate-income borrowers was excellent based on Five Star's overall lending record compared to the aggregate lending and the percentage of moderate-income families in each year of the review period. In 2020, Five Star made 47.2% of its home purchase loans by number and 40.6% by dollar volume to moderate-income borrowers which exceeded the aggregate lending performance of 25.2% number and 19.1% by dollar volume. Home purchase performance also exceeded the demographic of 16.5% of the families in this assessment area that were

moderate-income. Five Star's performance in 2018 and 2019 was consistent with 2020's performance.

Refinance Loans

Five Star's overall distribution of refinance loans to borrowers of different income levels borrowers was adequate based on poor distribution to low-income borrowers and adequate distribution to moderate-income borrowers. In 2020, Five Star made 4.1% of its refinance loans by number and 2.1% by dollar volume to low-income borrowers while the aggregate lending made 4.8% by number and 2.3% by dollar volume. Refinance performance was also below the demographic of 22.1% of the families in this assessment area that were low-income. Performance in 2019 was comparable to 2020's performance while performance in 2018 exceeded 2020's performance.

Refinance lending to moderate-income borrowers was adequate as performance was below the percentage of families that were moderate-income and comparable to the aggregate lending in 2018, 2019, and 2020. In 2020, Five Star made 12.7% of its refinance loans by number and 8.1% by dollar volume to moderate-income borrowers while 16.5% of the families in the assessment area were moderate-income. Performance was comparable to the aggregate lending of 15.2% of refinance loans to moderate-income borrowers by number and 9.8% by dollar volume.

Home Improvement Loans

Five Star's overall distribution of home improvement loans to borrowers of different income levels was adequate based on poor distribution to low-income borrowers and adequate distribution to moderate-income borrowers. In 2020, Five Star made 9.1% of its home improvement loans by number and 3.1% by dollar to low-income borrowers while 22.1% of the families in the assessment area were low-income. Performance was comparable to the aggregate lending which made 8.2% by number and 5.7% by dollar volume of home improvement loans to low-income borrowers. Performance in 2019 was significantly above 2020's performance while in 2018, the bank did not originate any home improvement loans for low-income borrowers.

Home improvement lending to moderate-income borrowers was adequate based on excellent performance in 2020 but was adequate in 2019 as Five Star made one home improvement loan to moderate-income borrowers and made no home improvement loans to moderate-income borrowers in 2018. In 2020, Five Star's performance of 36.4% by number and 22.0% by dollar volume exceeded the 16.5% of the families in the assessment area that were moderate-income and

the aggregate lending which made 18.0% by number and 14.0% by dollar volume of home improvement loans to moderate-income borrowers.

Small Business Loans

The overall level of lending to small businesses was good based on good performance in 2019 and 2020 as performance, while below the demographic, was above the aggregate lending in both years. Performance in 2018 was similar to the aggregate lending but below the demographic. In 2020, according to D&B data, 88.9% of businesses in the assessment area were small businesses with GAR of \$1 million or less when Five Star made 78.0% of its small business loans by number and 68.1% by dollar volume to businesses with GAR of \$1 million or less. The aggregate lending reported 39.0% by number and 23.4% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. In 2020, the bank originated 72.3% of small business loans to assessment area businesses in increments of \$100,000 or less which were typically amounts needed by smaller business entities.

Please refer to Appendix A for the borrower distribution tables of small business loans in the assessment area for 2018 through 2020.

Community Development Lending

In the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area, Five Star was a leader in making qualified community development loans and made use of innovative and/or flexible lending practices in serving the needs of this assessment areas.

The bank made 12 qualified community development loans totaling \$28.2 million, or 24.7% of Five Star’s total community development lending. Peer comparisons with other banking institutions in the assessment area indicated that Five Star ranked 1st of 5 peer banks in terms of annualized community development lending to deposits.

Community Development Loans		
Purpose	#	\$ (,000s)
Affordable Housing	2	\$8,650
Community Services	1	\$2,000
Economic Development	6	\$8,186
Revitalize and Stabilize	3	\$9,334
Totals	12	\$28,170

Community development lending was spread across the four categories as evidenced in the above chart.

Examples of community development lending included:

- A \$6.4 million loan to purchase 135 units of affordable housing operating under a Project Base Section 8 Housing Assistance Program.
- A \$6.0 million loan to redevelop a site located in a low-income census tract pursuant to a governmental redevelopment plan.
- A \$2.6 million loan to fund rehabilitation and environmental remediation to a property located in a low-income census tract.

INVESTMENT TEST

In the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area, Five Star made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank made significant use of innovative and complex investments to support community development initiatives. In addition, the bank exhibited good responsiveness to credit and community development needs in this assessment area.

The bank's qualified community development investments in this assessment area totaled \$12.9 million, or 12.9% of Five Star's bank-wide community development investments. Peer comparisons with other banking institutions in the assessment area indicated that Five Star ranked 1st of 5 peer banks. A majority of the bank's investments were in mortgage-backed securities.

Community Development Investments		
Purpose	#	\$ (,000s)
Affordable Housing	12	\$12,937
Community Services	0	\$0
Economic Development	0	\$0
Revitalize and Stabilize	0	\$0
Totals	12	\$12,937

In addition to the above referenced qualified investments, Five Star made 78 grants and contributions in this assessment area totaling \$527,928. As indicated in the subsequent table, philanthropic grants primarily targeted community service activities.

Philanthropic Grants				
Community Development Purpose	#	% (#)	\$ (,000s)	% (\$)
Affordable Housing	11	14.1%	\$67,000	12.7%
Community Services	52	66.7%	\$303,928	57.6%
Economic Development	13	16.7%	\$127,000	24.1%
Revitalize and Stabilize	2	2.6%	\$30,000	5.7%
Totals	78	100.0%	\$527,928	100.0%

Qualified investments and grants during the evaluation period included the following:

- An investment of \$4.3 million in mortgage-backed securities collateralized by the mortgages of LMI borrowers thereby supporting affordable housing.
- A \$10,000 grant to an organization that provided home repairs to families in need.

SERVICE TEST

In the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area, delivery systems were reasonably accessible to the bank’s geographies and individuals of different income levels. Five Star’s record of opening and closing of branches improved the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced this assessment area, particularly to LMI geographies and/or LMI individuals. Further, Five Star provided a relatively high level of community services to this assessment area.

Retail Services

Five Star’s delivery systems were reasonably accessible to the bank’s geographies and individuals of different income levels in its assessment area. Five Star operated six branches in this assessment area of which one was located in a moderate-income census tract, four located in upper-income census tracts, and one located in an unknown-income tract. One branch (20%¹) located in a LMI census tract in this assessment area compared favorably to the 25.0% of the assessment area’s families that resided in LMI census tracts.

Five Star’s record of opening and closing of branches improved the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. During the evaluation period, Five Star opened two branches in the City of Buffalo, one of which, the Seneca Street Branch, was

¹ The percent of branches located in LMI census tracts was based on five branches being located in census tracts of known income designation, while one branch was located in an unknown-income census tract.

located in a moderate-income census tract. Five Star installed an ATM accessible from the exterior of the bank, and also installed two interactive ATMs at this branch.

The services Five Star offered in this assessment area did not vary in a way that inconvenienced consumers, particularly to LMI geographies and/or LMI individuals. All of Five Star’s products and services were available at each branch location. Extended weekday hours were offered at four of the six branches, and three of the branches offered Saturday hours. Of the branches in this assessment area, one branch located in a moderate-income census tract did not have extended weekday or Saturday hours.

Community Development Services

Five Star provided a relatively high level of community development services in this assessment area. As presented in the subsequent table, Five Star conducted 47 community service events. The services consisted of a wide variety of events related to the financial education of children and adults, small business technical assistance, and participation with an organization promoting economic development and workforce training. Additionally, Five Star facilitated several first-time homebuyer seminars in LMI areas.

Summary of Community Development Services MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area October 1, 2018 – December 31, 2021	
Activity Type	Current Evaluation Total
Financial Education	15
Technical Assistance	20
Small Business Seminars	0
Board Participation	12
TOTAL ACTIVITY	47

Bank officers and senior staff served on the boards and committees of seven community development organizations that provided on-going financial and management expertise to organizations focused on LMI youth, children in foster care, support for homeless individuals and supportive housing for at-risk and disabled individuals. Examples of services included:

- A bank officer served on the Board of Directors of an organization focused on workforce development.
- A bank officer served on the Board of Directors of an organization providing credit

counseling services to LMI individuals and families.

- A bank officer facilitated first-time homebuyer seminars in LMI areas.

METROPOLITAN AREA (FULL REVIEW)

MSA 21300 (Elmira, NY) Assessment Area

DESCRIPTION OF INSTITUTION'S OPERATIONS

As of December 31, 2021, Five Star operated two of 49 branches (4.1%) in this assessment area. These branches generated \$190.6 million in deposits which accounted for 3.9% of the bank's total branch deposits as of June 30, 2021. Of the bank's total HMDA, small business, and small farm loans originated in 2018 through 2020, 2.8% were originated in the MSA 21300 (Elmira, NY) assessment area.

Five Star ranked 3rd in deposit market share in the assessment area, accounting for 13.9% of all bank's deposits in the assessment area. Lead banks in terms of deposit market share were Chemung Canal Trust Company, Elmira Savings Bank, and Community Bank, N.A.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe the assessment area and to evaluate the context in which Five Star operated. Information was obtained from publicly available sources, including the 2010 Census, 2015 ACS, FFIEC, D&B, the New York State Department of Labor, and HUD.

Demographic Characteristics

The MSA 21300 (Elmira, NY) assessment area was comprised of Chemung County, the only county in MSA 21300. According to the 2015 ACS, the population of the assessment area was 88,267. The assessment area consisted of 22 census tracts of which 4 or 18.2% were low-income, 3 or 13.6% were moderate-income, 11 or 50.0% were middle-income, 3 or 13.6% were upper-income, and 1 or 4.5% were unknown-income.

Income Characteristics

Based on the 2015 ACS data, the MSA 21300 assessment area had 21,951 families of which 22.9% were low-income (12.5% of which were below the poverty level), 16.0% were moderate-income, 21.0% were middle-income, and 40.0% were upper-income.

The FFIEC median family incomes for the county that comprised the MSA as of the 2015 ACS were as follows:

MSA 21300 (Elmira, NY) - Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$60,160	\$65,135	8.27%
New York State	\$73,401	\$71,913	-2.03%
<small>Source: 2006 - 2010 U.S. Census Bureau American Community Survey 2011 - 2015 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</small>			

Housing Characteristics

Based on the 2015 ACS data, the MSA 21300 assessment area had 38,382 housing units of which 63.3% were owner-occupied, 28.3% were rental units, and 8.4% were vacant. Of the total housing units, 13.1% were located in low-income tracts, 10.4% in moderate-income tracts, 53.3% in middle-income tracts, 23.0% in upper-income tracts, and 11 tracts or less than 1.0% were unknown-income tracts. In low-income census tracts, 22.5% of housing units were owner-occupied, 62.6% were rental units, and 15.0% were vacant. In moderate-income census tracts, 51.2% of housing units were owner-occupied, 41.7% were rental units, and 7.1% were vacant.

The median age of housing stock in the assessment area was 63 years old, with 46.2% of the stock built before 1950. The median age of housing stock was 61 years in both low- and moderate-income tracts. According to the 2015 ACS, the median housing value in the assessment area was \$100,415 with an affordability ratio of 50.1. The median gross rent in the assessment area was \$713 per month.

Geographic Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$100,415	50.1	\$713
New York State	\$283,400	20.9	\$1,132

Housing Cost Burden

According to HUD's Comprehensive Housing Affordability Strategy data, within the assessment area, 47.8% of all rental households had rental costs that exceeded 30% of their incomes, 75.2% of low-income rental households had rental costs that exceeded 30% of their income, and 35.8%

of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within the assessment area, 15.3% of homeowners had housing costs that exceeded 30% of their incomes, 57.6% of low-income homeowners had housing costs that exceeded 30% of their income, and 26.0% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the subsequent Housing Cost Burden table for more details.

MSA 21300 (Elmira, NY)- Housing Cost Burden						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	75.2%	35.8%	47.8%	57.6%	26.0%	15.3%
New York State	77.0%	45.6%	48.4%	73.5%	45.3%	28.2%

*Cost Burden is housing cost that equals 30% or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy.*

Labor, Employment and Economic Characteristics

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 5.8% in 2016, decreased to 5.5% in 2017, decreased to 4.6% in 2018, decreased to 4.0% in 2019, and increased to 8.8% in 2020. The State of New York had an unemployment rate of 4.9% in 2016, decreased to 4.6% in 2017, decreased to 4.1% in 2018, decreased to 3.8% in 2019, and increased to 10.0% in 2020 as detailed on the subsequent chart. The COVID-19 pandemic caused businesses to close or reduce their workforce across New York State which drastically increased the unemployment rates in 2020.

MSA 21300 (Elmira, NY) - Unemployment Rates					
Area	2016	2017	2018	2019	2020
Assessment Area	5.8%	5.5%	4.6%	4.0%	8.8%
New York State	4.9%	4.6%	4.1%	3.8%	10.0%

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

According to D&B data, there were 2,681 businesses operating in the assessment area in 2018 of which 19.0% were located in low-income census tracts and 12.3% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 87.3% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 17.7% were located in low-income geographies and 11.7% were located in moderate-income geographies.

According to D&B data, there were 2,673 businesses operating in the assessment area in 2019 of which 19.4% were located in low-income census tracts and 12.1% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 87.9% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 18.1% were located in low-income geographies and 11.3% were located in moderate-income geographies.

According to D&B data, there were 2,673 businesses operating in the assessment area in 2020 of which 19.0% were located in low-income census tracts and 12.3% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.3% were small businesses with a gross annual revenue ("GAR") of \$1 million or less of which 17.6% were located in low-income geographies and 11.4% were located in moderate-income geographies.

Additional performance context data for the assessment area is provided in the MSA 21300 (Elmira, NY) Assessment Area Demographics table on the subsequent page.

Assessment Area Demographics								
MSA 21300 (Elmira, NY) AA - 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	18.2	2,285	10.4	1,024	44.8	5,035	22.9
Moderate-income	3	13.6	2,070	9.4	455	22	3,522	16
Middle-income	11	50	11,752	53.5	1,116	9.5	4,616	21
Upper-income	3	13.6	5,844	26.6	157	2.7	8,778	40
Unknown-income	1	4.5	0	0	0	0	0	0
Total Assessment Area	22	100	21,951	100	2,752	12.5	21,951	100
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	5,045	1,133	4.7	22.5	3,156	62.6	756	15
Moderate-income	4,009	2,054	8.5	51.2	1,672	41.7	283	7.1
Middle-income	20,476	13,663	56.3	66.7	5,052	24.7	1,761	8.6
Upper-income	8,841	7,436	30.6	84.1	1,001	11.3	404	4.6
Unknown-income	11	0	0	0	0	0	11	100
Total Assessment Area	38,382	24,286	100	63.3	10,881	28.3	3,215	8.4
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	509	19	416	17.6	89	32.6	4	9.8
Moderate-income	330	12.3	270	11.4	54	19.8	6	14.6
Middle-income	1,135	42.5	1,037	44	75	27.5	23	56.1
Upper-income	698	26.1	636	27	54	19.8	8	19.5
Unknown-income	1	0	0	0	1	0.4	0	0
Total Assessment Area	2,673	100	2,359	100	273	100	41	100
	Percentage of Total Businesses:		88.3		10.2		1.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	1	1.7	0	0	1	100	0	0
Moderate-income	1	1.7	1	1.7	0	0	0	0
Middle-income	47	78.3	46	79.3	0	0	1	100
Upper-income	11	18.3	11	19	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	60	100	58	100	1	100	1	100
	Percentage of Total Farms:		96.7		1.7		1.7	

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

In the MSA 21300 (Elmira, NY) assessment area, Five Star's lending activity reflected good responsiveness to this assessment area's credit needs. The bank's performance with regard to the geographic distribution of loans reflected good penetration throughout the assessment area and a substantial majority of loans were made within this assessment area. The distribution of borrowers reflected, given the product lines offered, excellent penetration among customers of different income levels and businesses and farms of different sizes. Five Star exhibited a good record of serving low-income individuals and areas and very small businesses. The bank made an adequate level of community development loans.

Lending Activity

Five Star's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area, given the bank's capacity to meet assessment area credit needs, overall market conditions, and performance context factors. Five Star originated 55 home purchase, 20 refinance, 7 home improvement, and 105 small business loans during the evaluation period in this assessment area. Five Star ranked 3rd in deposit market share out of 7 institutions, as of June 30, 2021. In 2020, Five Star ranked 15th in HMDA lending out of 97 reporting institutions and ranked 3rd in small business lending out of 64 CRA reporting institutions.

Geographic Distribution of Loans

Five Star's overall geographic distribution of loans reflected good penetration throughout the assessment area. This lending performance was based on good HMDA and excellent small business penetration by the bank in LMI geographies.

Gap Analysis

Five Star's responsiveness to meeting the needs of the MSA 21300 (Elmira, NY) assessment area was evaluated through an analysis of gaps in lending in LMI census tracts. The overall penetration of tracts of different income levels in this assessment area was good in 2020 at 90.9% of all census tracts when evaluating HMDA and small business lending. In 2020, HMDA and small lending penetrated 100.0% of both low- and moderate-income census tracts. Overall penetration in 2019 was good at 90.9%, with 75.0% penetration in low-income census tracts and 100.0% in moderate-

income census tracts. Five Star’s 2018 performance was comparable to the 2019 performance. The subsequent chart summarizes the lending gap analysis.

Lending Gap Analysis - MSA 21300 (Elmira, NY) Assessment Area			
January 1, 2018 - December 31, 2020			
Tract Income Levels	Number of Tracts	Tracts with No Loans	Penetration
2018			
Low	4	0	100.0%
Moderate	3	1	66.7%
Middle	11	2	81.8%
Upper	3	0	100.0%
Income Unknown	1	1	0.0%
Total Tracts	22	4	81.8%
2019			
Low	4	1	75.0%
Moderate	3	0	100.0%
Middle	11	0	100.0%
Upper	3	0	100.0%
Income Unknown	1	1	0.0%
Total Tracts	22	2	90.9%
2020			
Low	4	0	100.0%
Moderate	3	0	100.0%
Middle	11	1	90.9%
Upper	3	0	100.0%
Income Unknown	1	1	0.0%
Total Tracts	22	2	90.9%

Opportunities for HMDA lending in low-income census tracts were impacted by a poverty rate of 44.8% based on the 2015 ACS. Additionally, according to the 2015 ACS, 62.6% of all housing units were rental properties; therefore, limiting opportunities for HMDA lending.

Home Purchase Loans

Five Star’s overall home purchase lending distribution was good based on adequate performance in low-income geographies and excellent performance in moderate-income geographies. Performance in low-income geographies was adequate in all three years as Five Star made one home purchase loan in low-income geographies in each of the three years which was comparable to, or exceeded, the demographic and aggregate lending. In 2020, Five Star made 4.5% of its home purchase loans in low-income geographies by number and 3.0% by dollar volume in this assessment area which is comparable to 2015 ACS demographic indicating that 4.7% of all owner-occupied housing units were located in low-income geographies. Home purchase performance in 2020 was comparable to the aggregate lending of 5.5% by number and 2.7% by dollar volume. Performance in 2019 was comparable to 2020’s performance while the bank significantly outperformed the aggregate lending in 2018.

Five Star's performance in moderate-income geographies was excellent based on excellent performance in 2018, 2019 and 2020. In 2020, Five Star made 22.7% of its home purchase loans in moderate-income geographies by number and 19.0% by dollar volume where the assessment area demographic indicated that 8.5% of all owner-occupied housing units were located in moderate-income geographies. Five Star's performance was significantly above the aggregate lending which made 9.3% of its home purchase loans by number and 6.3% by dollar volume. Home purchase performance in 2019 also significantly outperformed the aggregate lending being comparable to 2020's performance while the bank's performance in 2018 was comparable to the aggregate lending.

Refinance Loans

Five Star's performance in refinance lending was poor overall based on poor performance in both low- and moderate-income geographies. Five Star did not make any of its refinance loans in low-income geographies during the three-year review period and made only one refinance loan in 2019 in a moderate-income geography. In 2020, the aggregate lending made a total of 16 refinance loans in low-income geographies which indicated limited lending opportunities and resulted in 1.8% by number and 0.8% by dollar volume of refinance loans being made in low-income geographies. The aggregate lending produced similar results in 2019 and 2018. The assessment area demographic also indicated limited lending options with only 4.7% of all owner-occupied units being located in low-income geographies.

Five Star's performance in moderate-income geographies was poor as no refinance loans were originated in 2020 or 2018. In 2020, the aggregate lending was 6.5% by number and 3.7% by dollar volume with a market demographic of 8.5% of all owner-occupied housing units located in moderate-income geographies. In 2019, Five Star made 14.3% by number and 14.2% by dollar volume in moderate-income geographies where, according to the 2015 ACS, 8.5% of all owner-occupied housing units were located. Five Star's performance was above the aggregate lending which made 9.0% by number and 5.5% by dollar volume of its refinance loans in moderate-income geographies.

Small Business Loans

Small business performance for Five Star was excellent based on excellent performance in low-income geographies and good in moderate-income geographies. Five Star's overall performance in low-income geographies was considered excellent based on excellent performance in 2018 and

2020 and good performance in 2019. In 2020, Five Star's performance in low-income geographies was excellent as Five Star originated 29.4% of its small business loans by number and 29.6% by dollar volume in low-income geographies compared to the demographics of the assessment area, where, based on 2020 D&B data, 19.0% of small businesses operated. Small business performance was also above the performance of the aggregate lending which made 20.3% by number and 28.4% by dollar volume of its small business loans in low-income geographies. Five Star's performance also exceeded the aggregate lending and the assessment area demographic in 2019 and 2018.

Five Star's overall performance in moderate-income geographies was good. In 2020, Five Star originated 22.1% of its small business loans by number and 23.3% by dollar in moderate-income geographies, exceeding the assessment area demographic where, based on 2020 D&B data, 12.3% of small businesses operated; Five Star also exceeded the aggregate lending's 14.4% by number and 19.0% by dollar volume. Performance in 2019 was comparable to 2020's performance while 2018's performance was below.

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

Five Star's overall distribution of HMDA loans and small business lending was excellent among borrowers of different income levels and businesses of different sizes. This conclusion was based on excellent distribution of home purchase and refinance loans to low- and moderate-income borrowers and excellent distribution to small businesses. Home improvement loans were not evaluated as volume was insufficient to draw meaningful conclusions.

Home Purchase Loans

Five Star's overall distribution of home purchase loans to borrowers of different income levels was excellent based on excellent distribution to both low- and moderate-income borrowers. Performance exceeded the demographic and the aggregate lending in all three years. Opportunities for home purchase lending to low-income borrowers was impacted by the number of borrowers that had incomes below the poverty level. In 2020, 22.9% of the families in this assessment area were low-income, but more than half of these families had incomes that were below the poverty level. In 2020, Five Star made 40.9% of its home purchase loans by number and 36.8% by dollar volume to low-income borrowers while the aggregate lending made 12.5% by number and 7.7% by dollar volume. Performance in 2018 and 2019 was comparable to 2020's performance.

Home purchase lending to moderate-income borrowers was excellent based on Five Star's overall lending record compared to the aggregate lending and the percentage of moderate-income families

in each year of the review period. In 2020, Five Star made 31.8% of its home purchase loans by number and 32.3% by dollar volume to moderate-income borrowers which exceeded the aggregate lending's performance of 26.0% number and 21.7% by dollar volume. Home purchase performance also exceeded the demographic of 16.0% of the families in this assessment area that were moderate-income. Five Star's performance in 2018 and 2019 was consistent with 2020's performance.

Refinance Loans

Five Star's overall distribution of refinance loans to borrowers of different income levels was excellent based on excellent distribution to both low- and moderate-income borrowers. In 2020, Five Star made 16.7% of its refinance loans by number and 14.1% by dollar volume to low-income borrowers while the aggregate lending made 4.3% by number and 1.8% by dollar volume. Refinance performance was below the demographic of 22.9% of the families in this assessment area that were low-income. Performance in 2018 and 2019 was comparable to 2020's performance.

Refinance lending to moderate-income borrowers was excellent as the bank's performance exceeded both the percentage of families that were moderate-income and the aggregate lending in all three years. In 2020, Five Star made 50.0% of its refinance loans by number and 44.3% by dollar volume to moderate-income borrowers while 16.0% of the families in the assessment area were moderate-income. Performance exceeded the aggregate lending of 12.8% of refinance loans to moderate-income borrowers by number and 7.8% by dollar volume. Performance in 2018 and 2019 was comparable to 2020's performance.

Small Business Loans

The overall level of lending to small businesses was excellent based on excellent performance in 2018, 2019, and 2020. Performance in 2020 was excellent as performance was similar to the demographic and exceeded the aggregate lending. In 2020, according to D&B data, 88.3% of businesses in the assessment area were small businesses with GAR of \$1 million or less when Five Star similarly made 88.2% of its small business loans by number and 66.5% by dollar volume to businesses with GAR of \$1 million or less. Five Star's performance exceeded the aggregate lending which reported 33.7% by number and 16.8% by dollar volume of its small business loans to businesses with GAR of \$1 million or less. The bank's performance in 2018 and 2019 was comparable to 2020. In 2018, 2019, and 2020, the bank originated over 80.0% by number of its small business loans to assessment area businesses in increments of \$100,000 or less which were

typically amounts needed by smaller business entities.

Community Development Lending

In the MSA 21300 (Elmira, NY) assessment area, Five Star made an adequate level of qualified community development loans and made use of innovative and/or flexible lending practices in serving the needs of this assessment areas.

Five Star made an adequate level of community development loans the MSA 21300 (Elmira, NY) assessment area. The bank made one loan totaling \$6.1 million, or 5.4% of the bank’s total community development lending, exceeding the assessment area’s share of bank-wide deposits of 3.9%. Although the bank made only one community development loan in the assessment area, the loan was both impactful and exhibited excellent responsiveness to the credit and community development needs of the area. Comparable peer comparisons with other banking institutions, ranking 2nd out of 3 peer banks in the assessment area, supported Five Star’s adequate performance in terms of annualized community development lending to deposits.

Community Development Loans		
Purpose	#	\$ (,000)
Affordable Housing	1	\$6,130
Community Services	0	\$0
Economic Development	0	\$0
Revitalize and Stabilize	0	\$0
Totals	1	\$6,130

The following is a summary of the community development loan:

- A \$6.1 million loan to finance the restoration and adaptive reuse of two buildings into commercial space and 28 units of affordable housing for tenants with incomes below 50% of the area median income.

INVESTMENT TEST

In the MSA 21300 (Elmira, NY) assessment area, Five Star made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank made occasional use of innovative and complex investments to support community development initiatives. In addition, the bank exhibited good responsiveness to credit and community development needs in this assessment area.

The bank made qualified community development investments in this assessment area totaling

\$9.0 million, or 9.0% of Five Star’s bank-wide community development investment activity, exceeding this assessment area’s share of bank-wide deposits of 3.9%. Peer comparisons with other banking institutions in this assessment area indicated that Five Star compared favorably by exceeding the peers and ranking 1st out of 3 in terms of annualized community development investments to deposits.

Community Development Investments		
Purpose	#	\$ (,000s)
Affordable Housing	1	\$9,045
Community Services	0	\$0
Economic Development	0	\$0
Revitalize and Stabilize	0	\$0
Totals	1	\$9,045

In addition to the above referenced qualified investments, Five Star made six philanthropic grants in this assessment area totaling \$47,100. As indicated in the subsequent table, grants and donations primarily targeted community service activities.

Philanthropic Grants				
Community Development Purpose	#	% (#)	\$ (,000s)	% (\$)
Affordable Housing	0	0%	0	0%
Community Services	5	83.3%	\$42,100	89.4%
Economic Development	1	16.7%	\$5,000	10.6%
Revitalize and Stabilize	0	0%	\$0	0%
Totals	6	100.0%	\$47,100	100.0%

Example of qualified investments and grants included:

- Investments totaling \$9.0 million in Low-Income Housing Tax Credits, supporting 28 units of affordable housing restricted to tenants at or below 50% of the area median income.
- A \$17,000 grant to a nonprofit organization to support financial literacy classes and other supportive care services to homeless veterans and LMI individuals and families.

SERVICE TEST

In the MSA 21300 (Elmira, NY) assessment area, delivery systems were accessible to the bank’s geographies and individuals of different income levels. Five Star’s record of opening and closings 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 this assessment area, particularly to LMI geographies and/or LMI individuals. The bank provided a relatively high level of community development services.

Retail Services

Five Star’s delivery systems were accessible to the bank’s geographies and individuals of different income levels in the assessment area. Five Star operated two branches in this assessment area of which one, or 50.0%, was located in a low-income geography. This compared favorably to the 19.8% of the assessment area’s families that resided in LMI census tracts.

Five Star’s record of opening and closings of branches in this assessment area did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. During the evaluation period, Five Star relocated one branch within the same low-income census tract. The bank closed one branch in a moderate-income census tract due to low customer traffic; however, two remaining full-service branches were located within three miles of the closed branch, one of which was located in a low-income census tract and one in a middle-income census tract.

Services did not vary in a way that inconvenienced this assessment area, particularly to LMI geographies and/or LMI individuals. All products and services were available at each branch location. Each of Five Star’s branches had extended weekday hours. Of the two branches, one branch, located in an LMI census tract, did not have Saturday hours, but it did have two full-service ATMs available 24/7.

Community Development Services

Five Star provided a relatively high level of community development services. Bank staff conducted financial literacy community service events in this assessment area. An example of a community development service was bank staff conducting budgeting and saving workshops to students in a moderate-income area. Additionally, a community contact shared that Five Star partnered with their agency to provide financial literacy programs by providing both volunteer instructors and financial assistance.

Summary of Community Development Services MSA 21300 (Elmira, NY) Assessment Area October 1, 2018 – December 31, 2021	
Activity Type	Current Evaluation Total
Financial Education	2
Technical Assistance	0
Small Business Seminars	0
Board Participation	0
TOTAL ACTIVITY	2

APPENDIX A

HMDA & Small Business Distribution Reports

Distribution of 2018 Home Mortgage Lending By Income Level of Geography Assessment Area: New York State Nonmetropolitan AA							
Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans							
Low	0	0.0	0.6	0	0.0	0.3	0.7
Moderate	8	5.0	6.5	536	3.3	4.2	6.5
Middle	145	91.2	80.8	14,965	92.4	80.3	83.3
Upper	6	3.8	12.1	688	4.2	15.3	9.5
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	0.0
Total	159	100.0	100.0	16,189	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.4	0	0.0	0.2	0.7
Moderate	1	1.0	4.8	70	0.8	3.3	6.5
Middle	91	91.0	82.7	8,105	90.3	81.8	83.3
Upper	8	8.0	12.2	796	8.9	14.7	9.5
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	0.0
Total	100	100.0	100.0	8,971	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.6	0	0.0	0.3	0.7
Moderate	2	8.0	4.2	45	4.0	2.4	6.5
Middle	21	84.0	81.4	1,022	91.9	82.3	83.3
Upper	2	8.0	13.8	45	4.0	15.0	9.5
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	0.0
Total	25	100.0	100.0	1,112	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	6.7	0	0.0	5.2	14.6
Middle	4	80.0	86.7	3,902	62.9	74.5	65.9
Upper	1	20.0	6.7	2,300	37.1	20.3	11.6
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	0.0
Total	5	100.0	100.0	6,202	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.5	0	0.0	0.2	0.7
Moderate	11	3.8	5.8	651	2.0	4.0	6.5
Middle	261	90.3	81.7	27,994	86.2	80.8	83.3
Upper	17	5.9	11.9	3,829	11.8	15.0	9.5
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	0.0
Total	289	100.0	100.0	32,474	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: New York State Nonmetropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.5	0	0.0	0.2	1	0.7	0.5	62	0.4	0.2	0.7
Moderate	11	8.3	6.5	796	5.2	4.1	1	0.7	6.5	24	0.1	4.2	6.5
Middle	121	91.0	82.0	14,429	93.5	81.4	130	93.5	81.3	15,127	91.9	80.8	83.3
Upper	1	0.8	11.1	200	1.3	14.2	7	5.0	11.7	1,244	7.6	14.7	9.5
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	133	100.0	100.0	15,425	100.0	100.0	139	100.0	100.0	16,457	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.1	0	0.0	0.0	0.7
Moderate	3	2.4	4.9	219	1.8	3.4	4	1.8	3.5	283	1.1	2.1	6.5
Middle	111	90.2	81.7	11,068	90.1	80.2	202	92.2	81.3	23,271	91.3	79.8	83.3
Upper	9	7.3	12.8	991	8.1	15.9	13	5.9	15.1	1,935	7.6	18.0	9.5
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	123	100.0	100.0	12,278	100.0	100.0	219	100.0	100.0	25,489	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.4	0	0.0	0.3	0.7
Moderate	0	0.0	6.1	0	0.0	4.2	0	0.0	3.9	0	0.0	2.5	6.5
Middle	16	94.1	83.1	708	94.7	84.6	27	100.0	84.1	1,550	100.0	83.8	83.3
Upper	1	5.9	10.4	40	5.3	10.9	0	0.0	11.6	0	0.0	13.5	9.5
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	17	100.0	100.0	748	100.0	100.0	27	100.0	100.0	1,550	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	5.9	0	0.0	0.8	0	0.0	10.4	0	0.0	1.8	7.8
Moderate	1	50.0	23.5	800	6.1	10.4	4	57.1	12.5	9,803	54.0	40.7	14.6
Middle	1	50.0	67.6	12,360	93.9	87.3	2	28.6	68.8	1,338	7.4	44.2	65.9
Upper	0	0.0	2.9	0	0.0	1.5	1	14.3	8.3	7,000	38.6	13.3	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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	13,160	100.0	100.0	7	100.0	100.0	18,141	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.5	0	0.0	0.3	1	0.3	0.4	62	0.1	0.2	0.7
Moderate	15	5.5	6.0	1,815	4.4	4.1	9	2.3	5.1	10,110	16.4	4.8	6.5
Middle	249	90.5	82.2	38,565	92.7	81.5	361	92.1	81.6	41,286	67.0	79.2	83.3
Upper	11	4.0	11.3	1,231	3.0	14.0	21	5.4	12.8	10,179	16.5	15.8	9.5
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	275	100.0	100.0	41,611	100.0	100.0	392	100.0	100.0	61,637	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Home Mortgage Lending By Borrower Income Level							
Assessment Area: New York State Nonmetropolitan AA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	21	13.2	7.6	1,294	8.0	4.1	20.5
Moderate	62	39.0	23.5	5,510	34.0	17.2	18.4
Middle	28	17.6	23.5	2,655	16.4	21.0	22.1
Upper	39	24.5	34.7	5,859	36.2	47.9	39.1
Unknown	9	5.7	10.6	871	5.4	9.8	0.0
Total	159	100.0	100.0	16,189	100.0	100.0	100.0
Refinance Loans							
Low	12	12.0	10.8	654	7.3	6.6	20.5
Moderate	21	21.0	20.5	1,440	16.1	16.0	18.4
Middle	29	29.0	27.1	2,740	30.5	24.4	22.1
Upper	34	34.0	36.4	3,766	42.0	47.1	39.1
Unknown	4	4.0	5.2	371	4.1	5.9	0.0
Total	100	100.0	100.0	8,971	100.0	100.0	100.0
Home Improvement Loans							
Low	6	24.0	8.6	180	16.2	5.7	20.5
Moderate	7	28.0	19.9	233	21.0	15.8	18.4
Middle	5	20.0	25.2	378	34.0	22.2	22.1
Upper	7	28.0	43.5	321	28.9	54.0	39.1
Unknown	0	0.0	2.7	0	0.0	2.4	0.0
Total	25	100.0	100.0	1,112	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	39	13.7	8.4	2,128	8.1	4.8	20.5
Moderate	90	31.7	21.9	7,183	27.3	16.7	18.4
Middle	62	21.8	24.2	5,773	22.0	21.4	22.1
Upper	80	28.2	35.3	9,946	37.9	47.5	39.1
Unknown	13	4.6	10.3	1,242	4.7	9.7	0.0
Total	284	100.0	100.0	26,272	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: New York State Nonmetropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	20	15.0	7.9	1,527	9.9	4.4	16	11.5	7.0	1,243	7.6	3.7	20.5
Moderate	49	36.8	22.2	4,652	30.2	16.0	49	35.3	21.9	5,023	30.5	15.3	18.4
Middle	26	19.5	23.3	2,943	19.1	21.3	34	24.5	23.2	3,998	24.3	20.7	22.1
Upper	31	23.3	33.4	5,234	33.9	46.2	35	25.2	34.2	5,625	34.2	47.7	39.1
Unknown	7	5.3	13.2	1,069	6.9	12.1	5	3.6	13.8	568	3.5	12.6	0.0
Total	133	100.0	100.0	15,425	100.0	100.0	139	100.0	100.0	16,457	100.0	100.0	100.0
Refinance Loans													
Low	9	7.3	9.7	587	4.8	5.6	11	5.0	4.4	691	2.7	2.2	20.5
Moderate	27	22.0	17.4	2,019	16.4	12.1	39	17.8	14.3	3,549	13.9	9.0	18.4
Middle	42	34.1	27.5	4,182	34.1	23.7	63	28.8	24.4	5,852	23.0	18.9	22.1
Upper	39	31.7	38.1	4,850	39.5	49.3	96	43.8	48.2	14,161	55.6	59.9	39.1
Unknown	6	4.9	7.3	640	5.2	9.3	10	4.6	8.7	1,236	4.8	9.9	0.0
Total	123	100.0	100.0	12,278	100.0	100.0	219	100.0	100.0	25,489	100.0	100.0	100.0
Home Improvement Loans													
Low	3	17.6	9.2	120	16.0	6.5	2	7.4	7.8	75	4.8	4.6	20.5
Moderate	2	11.8	18.5	60	8.0	14.1	5	18.5	16.1	310	20.0	11.0	18.4
Middle	6	35.3	27.5	258	34.5	25.0	7	25.9	26.9	287	18.5	22.3	22.1
Upper	5	29.4	41.8	270	36.1	52.0	13	48.1	46.6	878	56.6	58.6	39.1
Unknown	1	5.9	3.1	40	5.3	2.4	0	0.0	2.7	0	0.0	3.4	0.0
Total	17	100.0	100.0	748	100.0	100.0	27	100.0	100.0	1,550	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	32	11.7	8.5	2,234	7.9	4.8	29	7.5	5.9	2,009	4.6	3.1	20.5
Moderate	78	28.6	19.7	6,731	23.7	14.6	93	24.2	17.7	8,882	20.4	12.4	18.4
Middle	74	27.1	24.6	7,383	25.9	21.9	104	27.0	22.9	10,137	23.3	19.6	22.1
Upper	75	27.5	35.1	10,354	36.4	46.7	144	37.4	39.1	20,664	47.5	51.8	39.1
Unknown	14	5.1	12.1	1,749	6.1	12.0	15	3.9	14.4	1,804	4.1	13.1	0.0
Total	273	100.0	100.0	28,451	100.0	100.0	385	100.0	100.0	43,496	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2018 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 40380							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	26	10.6	2.5	1,645	5.9	1.4	3.4
Moderate	74	30.2	11.0	6,125	22.0	6.9	11.3
Middle	116	47.3	51.1	14,555	52.3	46.0	53.2
Upper	29	11.8	35.4	5,516	19.8	45.6	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	245	100.0	100.0	27,841	100.0	100.0	100.0
Refinance Loans							
Low	1	1.1	2.7	90	0.8	2.0	3.4
Moderate	3	3.4	9.0	302	2.8	6.8	11.3
Middle	69	79.3	52.6	7,375	69.3	48.9	53.2
Upper	14	16.1	35.7	2,881	27.1	42.3	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	87	100.0	100.0	10,648	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.6	0	0.0	1.5	3.4
Moderate	3	20.0	9.4	64	11.4	6.7	11.3
Middle	10	66.7	51.7	448	80.1	48.5	53.2
Upper	2	13.3	36.3	47	8.4	43.2	32.1
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	
Total	15	100.0	100.0	559	100.0	100.0	100.0
Multifamily Loans							
							Multi-family Units %
Low	2	100.0	23.9	8,118	100.0	6.5	16.6
Moderate	0	0.0	28.4	0	0.0	10.8	18.7
Middle	0	0.0	37.5	0	0.0	63.6	40.3
Upper	0	0.0	10.2	0	0.0	19.1	24.3
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	
Total	2	100.0	100.0	8,118	100.0	100.0	100.0
Total Home Mortgage Loans							
							Owner Occupied Units %
Low	29	8.3	2.7	9,853	20.9	1.9	3.4
Moderate	80	22.9	10.4	6,491	13.8	7.1	11.3
Middle	195	55.9	51.5	22,378	47.4	48.0	53.2
Upper	45	12.9	35.3	8,444	17.9	42.9	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	349	100.0	100.0	47,166	100.0	100.0	100.0
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 40380													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	47	15.4	3.0	3,381	10.3	1.6	24	9.8	3.3	1,701	5.5	1.8	3.4
Moderate	92	30.2	11.5	7,271	22.2	7.1	73	29.7	12.1	7,616	24.7	7.7	11.3
Middle	134	43.9	51.1	15,408	47.1	46.2	112	45.5	50.3	15,008	48.7	46.2	53.2
Upper	32	10.5	34.3	6,664	20.4	45.1	37	15.0	34.3	6,496	21.1	44.2	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	305	100.0	100.0	32,724	100.0	100.0	246	100.0	100.0	30,821	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.3	0	0.0	1.5	2	0.8	1.4	171	0.5	1.0	3.4
Moderate	8	10.1	9.2	759	7.6	6.2	18	7.2	5.8	2,197	6.2	3.8	11.3
Middle	58	73.4	49.7	6,135	61.3	44.3	169	67.9	45.2	22,137	62.8	38.5	53.2
Upper	13	16.5	38.7	3,114	31.1	48.0	60	24.1	47.5	10,741	30.5	56.8	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	79	100.0	100.0	10,008	100.0	100.0	249	100.0	100.0	35,246	100.0	100.0	100.0
Home Improvement Loans													
Low	1	4.3	2.2	25	2.7	1.5	0	0.0	2.0	0	0.0	1.2	3.4
Moderate	2	8.7	8.6	177	19.2	6.0	2	6.1	7.9	105	5.8	5.3	11.3
Middle	18	78.3	50.2	657	71.1	47.0	22	66.7	52.4	886	48.7	48.1	53.2
Upper	2	8.7	38.9	65	7.0	45.5	9	27.3	37.7	829	45.5	45.4	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	924	100.0	100.0	33	100.0	100.0	1,820	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	14.3	18.2	1,650	3.8	4.3	0	0.0	23.9	0	0.0	8.1	16.6
Moderate	2	28.6	28.9	8,405	19.3	16.0	0	0.0	23.4	0	0.0	15.9	18.7
Middle	2	28.6	38.8	1,260	2.9	41.2	2	66.7	37.6	8,160	30.3	32.6	40.3
Upper	2	28.6	14.0	32,200	74.0	38.5	1	33.3	14.6	18,800	69.7	43.4	24.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	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	
Total	7	100.0	100.0	43,515	100.0	100.0	3	100.0	100.0	26,960	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	49	11.8	2.9	5,056	5.8	1.8	26	4.9	2.6	1,872	2.0	2.2	3.4
Moderate	104	25.1	10.6	16,612	19.1	7.5	93	17.5	9.2	9,918	10.5	7.0	11.3
Middle	212	51.2	50.5	23,460	26.9	45.4	305	57.4	48.2	46,191	48.7	41.6	53.2
Upper	49	11.8	36.0	42,043	48.2	45.3	107	20.2	40.0	36,866	38.9	49.1	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	414	100.0	100.0	87,171	100.0	100.0	531	100.0	100.0	94,847	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 40380							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	85	34.7	9.2	6,671	24.0	4.9	21.9
Moderate	89	36.3	24.6	8,960	32.2	18.0	17.1
Middle	29	11.8	22.2	3,522	12.7	21.0	19.9
Upper	37	15.1	32.9	7,933	28.5	45.8	41.0
Unknown	5	2.0	11.2	755	2.7	10.4	0.0
Total	245	100.0	100.0	27,841	100.0	100.0	100.0
Refinance Loans							
Low	11	12.6	10.2	894	8.4	6.1	21.9
Moderate	25	28.7	21.7	2,210	20.8	16.1	17.1
Middle	16	18.4	24.7	1,653	15.5	22.1	19.9
Upper	32	36.8	37.6	5,106	48.0	46.3	41.0
Unknown	3	3.4	5.9	785	7.4	9.5	0.0
Total	87	100.0	100.0	10,648	100.0	100.0	100.0
Home Improvement Loans							
Low	3	20.0	7.6	110	19.7	5.9	21.9
Moderate	4	26.7	19.7	103	18.4	15.0	17.1
Middle	2	13.3	25.3	100	17.9	21.6	19.9
Upper	5	33.3	45.5	174	31.1	55.8	41.0
Unknown	1	6.7	1.9	72	12.9	1.8	0.0
Total	15	100.0	100.0	559	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	99	28.5	9.1	7,675	19.7	5.2	21.9
Moderate	118	34.0	22.8	11,273	28.9	17.2	17.1
Middle	47	13.5	22.8	5,275	13.5	21.1	19.9
Upper	74	21.3	35.1	13,213	33.8	45.9	41.0
Unknown	9	2.6	10.2	1,612	4.1	10.7	0.0
Total	347	100.0	100.0	39,048	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 40380													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	103	33.8	9.3	8,098	24.7	5.1	77	31.3	9.5	6,875	22.3	5.2	21.9
Moderate	131	43.0	24.6	13,847	42.3	18.3	91	37.0	22.9	10,666	34.6	17.3	17.1
Middle	28	9.2	21.7	3,342	10.2	20.5	34	13.8	21.8	5,261	17.1	19.9	19.9
Upper	33	10.8	31.3	6,184	18.9	44.1	36	14.6	32.7	6,616	21.5	44.6	41.0
Unknown	10	3.3	13.1	1,253	3.8	12.0	8	3.3	13.1	1,403	4.6	13.0	0.0
Total	305	100.0	100.0	32,724	100.0	100.0	246	100.0	100.0	30,821	100.0	100.0	100.0
Refinance Loans													
Low	3	3.8	9.2	151	1.5	5.1	13	5.2	4.9	842	2.4	2.5	21.9
Moderate	23	29.1	20.6	1,840	18.4	14.3	55	22.1	15.0	5,202	14.8	9.5	17.1
Middle	20	25.3	23.6	2,542	25.4	20.1	62	24.9	24.2	7,877	22.3	19.6	19.9
Upper	25	31.6	39.1	4,166	41.6	51.6	90	36.1	49.1	17,059	48.4	60.8	41.0
Unknown	8	10.1	7.4	1,309	13.1	9.0	29	11.6	6.8	4,266	12.1	7.6	0.0
Total	79	100.0	100.0	10,008	100.0	100.0	249	100.0	100.0	35,246	100.0	100.0	100.0
Home Improvement Loans													
Low	5	21.7	7.6	130	14.1	4.9	2	6.1	7.4	75	4.1	5.5	21.9
Moderate	2	8.7	19.1	32	3.5	15.1	10	30.3	19.0	403	22.1	13.6	17.1
Middle	8	34.8	25.9	294	31.8	23.0	7	21.2	24.0	349	19.2	20.9	19.9
Upper	7	30.4	45.8	363	39.3	55.2	12	36.4	47.2	918	50.4	56.3	41.0
Unknown	1	4.3	1.6	105	11.4	1.7	2	6.1	2.4	75	4.1	3.7	0.0
Total	23	100.0	100.0	924	100.0	100.0	33	100.0	100.0	1,820	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	111	27.3	9.2	8,379	19.2	5.2	92	17.4	7.1	7,792	11.5	3.9	21.9
Moderate	156	38.3	22.3	15,719	36.0	16.8	156	29.5	18.2	16,271	24.0	13.2	17.1
Middle	56	13.8	22.4	6,178	14.2	20.2	103	19.5	22.4	13,487	19.9	19.4	19.9
Upper	65	16.0	35.1	10,713	24.5	46.4	138	26.1	39.9	24,593	36.2	51.5	41.0
Unknown	19	4.7	11.1	2,667	6.1	11.4	39	7.4	12.5	5,744	8.5	12.1	0.0
Total	407	100.0	100.0	43,656	100.0	100.0	528	100.0	100.0	67,887	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2018 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 15380 (Erie County)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	62	15.9	5.4	6,117	9.1	3.1	7.4
Moderate	55	14.1	9.8	7,151	10.6	6.6	11.2
Middle	148	37.9	43.7	23,352	34.7	37.6	41.8
Upper	125	32.0	41.1	30,368	45.1	52.6	39.6
Unknown	1	0.3	0.0	369	0.5	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	391	100.0	100.0	67,357	100.0	100.0	100.0
Refinance Loans							
Low	1	2.0	3.5	56	0.6	2.4	7.4
Moderate	3	6.1	8.7	253	2.8	5.9	11.2
Middle	18	36.7	41.7	3,149	34.5	35.7	41.8
Upper	26	53.1	46.1	5,471	59.9	55.8	39.6
Unknown	1	2.0	0.1	199	2.2	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	49	100.0	100.0	9,128	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.6	0	0.0	3.0	7.4
Moderate	0	0.0	7.8	0	0.0	6.6	11.2
Middle	2	40.0	40.6	162	63.8	36.6	41.8
Upper	3	60.0	47.0	92	36.2	53.8	39.6
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	
Total	5	100.0	100.0	254	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	17.2	0	0.0	8.4	17.4
Moderate	4	44.4	20.9	4,480	53.4	8.6	12.5
Middle	4	44.4	39.3	2,933	34.9	23.9	37.5
Upper	1	11.1	20.9	980	11.7	29.7	31.1
Unknown	0	0.0	1.8	0	0.0	29.3	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	8,393	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	63	13.9	4.8	6,173	7.3	3.7	7.4
Moderate	62	13.7	9.4	11,884	14.0	6.8	11.2
Middle	172	37.9	42.5	29,596	34.8	35.2	41.8
Upper	155	34.1	43.2	36,911	43.4	50.3	39.6
Unknown	2	0.4	0.1	568	0.7	4.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	454	100.0	100.0	85,132	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 15380 (Erie County)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	46	11.2	5.2	5,629	8.2	3.1	46	12.5	5.0	5,312	7.9	3.0	7.4
Moderate	52	12.7	9.9	6,354	9.3	6.7	45	12.2	9.8	6,761	10.0	6.8	11.2
Middle	185	45.0	44.6	28,136	41.0	39.0	164	44.4	43.8	28,159	41.8	38.5	41.8
Upper	127	30.9	40.2	28,019	40.8	51.1	114	30.9	41.3	27,211	40.3	51.6	39.6
Unknown	1	0.2	0.1	460	0.7	0.1	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	411	100.0	100.0	68,598	100.0	100.0	369	100.0	100.0	67,443	100.0	100.0	100.0
Refinance Loans													
Low	4	8.3	3.6	641	6.4	2.3	13	6.6	2.3	1,585	3.9	1.4	7.4
Moderate	3	6.3	8.1	501	5.0	5.6	8	4.1	5.6	1,585	3.9	3.6	11.2
Middle	15	31.3	40.1	2,826	28.4	33.5	67	34.0	36.6	11,195	27.9	29.6	41.8
Upper	26	54.2	48.2	5,984	60.1	58.6	109	55.3	55.4	25,806	64.2	65.2	39.6
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	
Total	48	100.0	100.0	9,952	100.0	100.0	197	100.0	100.0	40,171	100.0	100.0	100.0
Home Improvement Loans													
Low	1	12.5	5.6	150	31.6	4.5	3	13.6	5.5	180	12.2	4.3	7.4
Moderate	1	12.5	9.6	120	25.3	7.8	2	9.1	8.3	113	7.7	7.0	11.2
Middle	4	50.0	39.1	122	25.7	34.1	6	27.3	37.3	375	25.5	30.9	41.8
Upper	2	25.0	45.7	82	17.3	53.1	10	45.5	48.8	752	51.2	57.8	39.6
Unknown	0	0.0	0.0	0	0.0	0.6	1	4.5	0.1	50	3.4	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	474	100.0	100.0	22	100.0	100.0	1,470	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	11.1	17.0	208	1.1	7.2	2	15.4	15.8	9,300	12.5	9.9	17.4
Moderate	1	11.1	16.0	4,400	24.3	4.2	3	23.1	18.4	1,128	1.5	8.3	12.5
Middle	4	44.4	40.4	6,630	36.6	56.2	3	23.1	37.3	1,377	1.9	27.8	37.5
Upper	3	33.3	25.5	6,880	38.0	31.5	4	30.8	25.9	42,725	57.6	47.3	31.1
Unknown	0	0.0	1.1	0	0.0	0.9	1	7.7	2.5	19,585	26.4	6.7	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	18,118	100.0	100.0	13	100.0	100.0	74,115	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	52	10.9	4.9	6,628	6.8	3.8	64	10.6	3.9	16,377	8.9	2.8	7.4
Moderate	57	12.0	9.4	11,375	11.7	6.0	58	9.7	8.0	9,587	5.2	5.6	11.2
Middle	208	43.7	42.3	37,714	38.8	40.8	240	39.9	40.0	41,106	22.4	33.6	41.8
Upper	158	33.2	43.4	40,965	42.2	49.1	237	39.4	48.0	96,494	52.7	57.3	39.6
Unknown	1	0.2	0.1	460	0.5	0.2	2	0.3	0.1	19,635	10.7	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	476	100.0	100.0	97,142	100.0	100.0	601	100.0	100.0	183,199	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 15380 (Erie County)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	68	17.4	9.1	6,669	9.9	5.0	22.1
Moderate	133	34.0	25.3	17,103	25.4	18.5	16.5
Middle	56	14.3	22.8	9,180	13.6	21.4	19.9
Upper	131	33.5	31.3	33,968	50.4	43.2	41.6
Unknown	3	0.8	11.5	437	0.6	11.9	0.0
Total	391	100.0	100.0	67,357	100.0	100.0	100.0
Refinance Loans							
Low	2	4.1	10.6	135	1.5	6.5	22.1
Moderate	7	14.3	20.3	778	8.5	15.2	16.5
Middle	19	38.8	25.8	2,635	28.9	23.6	19.9
Upper	16	32.7	36.0	4,084	44.7	46.8	41.6
Unknown	5	10.2	7.3	1,496	16.4	7.8	0.0
Total	49	100.0	100.0	9,128	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	9.0	0	0.0	6.5	22.1
Moderate	0	0.0	18.5	0	0.0	14.7	16.5
Middle	1	20.0	26.5	40	15.7	23.4	19.9
Upper	3	60.0	40.3	187	73.6	49.8	41.6
Unknown	1	20.0	5.7	27	10.6	5.5	0.0
Total	5	100.0	100.0	254	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	70	15.7	9.3	6,804	8.9	5.5	22.1
Moderate	140	31.5	22.3	17,881	23.3	17.1	16.5
Middle	76	17.1	23.5	11,855	15.4	21.7	19.9
Upper	150	33.7	33.6	38,239	49.8	44.3	41.6
Unknown	9	2.0	11.2	1,960	2.6	11.4	0.0
Total	445	100.0	100.0	76,739	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 15380 (Erie County)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	79	19.2	8.7	8,463	12.3	5.0	71	19.2	7.8	8,061	12.0	4.5	22.1
Moderate	162	39.4	24.7	21,925	32.0	18.3	174	47.2	25.2	27,414	40.6	19.1	16.5
Middle	68	16.5	22.6	12,961	18.9	21.4	43	11.7	22.2	7,737	11.5	20.6	19.9
Upper	97	23.6	30.3	24,497	35.7	41.3	77	20.9	30.3	22,723	33.7	41.3	41.6
Unknown	5	1.2	13.8	752	1.1	13.9	4	1.1	14.5	1,508	2.2	14.5	0.0
Total	411	100.0	100.0	68,598	100.0	100.0	369	100.0	100.0	67,443	100.0	100.0	100.0
Refinance Loans													
Low	2	4.2	9.2	161	1.6	5.1	8	4.1	4.8	859	2.1	2.3	22.1
Moderate	7	14.6	20.3	900	9.0	14.4	25	12.7	15.2	3,234	8.1	9.8	16.5
Middle	8	16.7	23.7	860	8.6	20.8	49	24.9	24.4	8,293	20.6	20.4	19.9
Upper	27	56.3	37.7	6,555	65.9	48.8	99	50.3	44.7	24,340	60.6	55.4	41.6
Unknown	4	8.3	9.1	1,476	14.8	10.9	16	8.1	10.8	3,445	8.6	12.1	0.0
Total	48	100.0	100.0	9,952	100.0	100.0	197	100.0	100.0	40,171	100.0	100.0	100.0
Home Improvement Loans													
Low	1	12.5	10.9	46	9.7	7.6	2	9.1	8.2	46	3.1	5.7	22.1
Moderate	1	12.5	18.5	26	5.5	14.9	8	36.4	18.0	324	22.0	14.0	16.5
Middle	1	12.5	26.6	25	5.3	23.8	2	9.1	24.0	169	11.5	22.7	19.9
Upper	3	37.5	39.1	202	42.6	48.2	8	36.4	42.9	716	48.7	49.9	41.6
Unknown	2	25.0	4.9	175	36.9	5.5	2	9.1	6.9	215	14.6	7.6	0.0
Total	8	100.0	100.0	474	100.0	100.0	22	100.0	100.0	1,470	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	82	17.6	9.0	8,670	11.0	5.1	81	13.8	6.2	8,966	8.2	3.4	22.1
Moderate	170	36.4	22.0	22,851	28.9	16.7	207	35.2	19.2	30,972	28.4	14.2	16.5
Middle	77	16.5	23.0	13,846	17.5	21.1	94	16.0	22.5	16,199	14.9	20.0	19.9
Upper	127	27.2	33.5	31,254	39.6	43.8	184	31.3	37.0	47,779	43.8	47.5	41.6
Unknown	11	2.4	12.5	2,403	3.0	13.3	22	3.7	15.1	5,168	4.7	14.8	0.0
Total	467	100.0	100.0	79,024	100.0	100.0	588	100.0	100.0	109,084	100.0	100.0	100.0
Source: 2020 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2018 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 21300							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	1	10.0	4.2	65	4.7	1.9	4.7
Moderate	1	10.0	9.6	73	5.3	5.5	8.5
Middle	5	50.0	50.9	421	30.6	44.8	56.3
Upper	3	30.0	35.2	816	59.3	47.8	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	
Total	10	100.0	100.0	1,375	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.0	0	0.0	1.4	4.7
Moderate	0	0.0	9.9	0	0.0	7.4	8.5
Middle	7	100.0	55.6	369	100.0	56.3	56.3
Upper	0	0.0	31.5	0	0.0	34.8	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	
Total	7	100.0	100.0	369	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.4	0	0.0	2.6	4.7
Moderate	0	0.0	4.5	0	0.0	3.7	8.5
Middle	1	100.0	55.4	15	100.0	49.7	56.3
Upper	0	0.0	36.7	0	0.0	44.0	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	
Total	1	100.0	100.0	15	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	1	100.0	30.8	203	100.0	2.2	34.4
Moderate	0	0.0	7.7	0	0.0	57.1	15.4
Middle	0	0.0	46.2	0	0.0	35.5	40.0
Upper	0	0.0	15.4	0	0.0	5.1	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	
Total	1	100.0	100.0	203	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	2	10.5	4.0	268	13.7	2.0	4.7
Moderate	1	5.3	9.2	73	3.7	15.2	8.5
Middle	13	68.4	52.2	805	41.0	45.3	56.3
Upper	3	15.8	34.5	816	41.6	37.5	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	
Total	19	100.0	100.0	1,962	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

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

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

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 21300													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	4.3	5.1	48	2.8	2.5	1	4.5	5.5	64	3.0	2.7	4.7
Moderate	6	26.1	10.7	395	23.1	7.0	5	22.7	9.3	403	19.0	6.3	8.5
Middle	14	60.9	52.1	1,020	59.6	48.3	12	54.5	54.5	1,084	51.2	51.2	56.3
Upper	2	8.7	32.1	247	14.4	42.2	4	18.2	30.7	566	26.7	39.8	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	
Total	23	100.0	100.0	1,710	100.0	100.0	22	100.0	100.0	2,117	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.0	0	0.0	1.8	0	0.0	1.8	0	0.0	0.8	4.7
Moderate	1	14.3	9.0	50	14.2	5.5	0	0.0	6.5	0	0.0	3.7	8.5
Middle	4	57.1	50.6	235	66.8	46.6	3	50.0	48.7	219	43.5	44.7	56.3
Upper	2	28.6	37.4	67	19.0	46.1	3	50.0	43.0	284	56.5	50.8	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	
Total	7	100.0	100.0	352	100.0	100.0	6	100.0	100.0	503	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.3	0	0.0	3.1	0	0.0	5.0	0	0.0	3.9	4.7
Moderate	0	0.0	8.2	0	0.0	4.9	0	0.0	7.9	0	0.0	6.7	8.5
Middle	1	50.0	52.2	45	40.9	51.6	4	100.0	51.8	191	100.0	55.4	56.3
Upper	1	50.0	35.3	65	59.1	40.4	0	0.0	35.3	0	0.0	34.1	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	
Total	2	100.0	100.0	110	100.0	100.0	4	100.0	100.0	191	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	22.2	0	0.0	1.4	0	0.0	30.0	0	0.0	25.5	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	77.8	0	0.0	98.6	0	0.0	50.0	0	0.0	71.9	40.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	20.0	0	0.0	2.5	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	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	3.1	4.6	48	2.2	2.4	1	3.1	3.9	64	2.3	3.5	4.7
Moderate	7	21.9	9.5	445	20.5	6.0	5	15.6	8.1	403	14.3	4.8	8.5
Middle	19	59.4	52.6	1,300	59.9	51.8	19	59.4	52.3	1,494	53.1	50.2	56.3
Upper	5	15.6	33.3	379	17.4	39.8	7	21.9	35.7	850	30.2	41.5	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	
Total	32	100.0	100.0	2,172	100.0	100.0	32	100.0	100.0	2,811	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

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

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

Distribution of 2018 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 21300							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	2	20.0	11.9	129	9.4	6.0	22.9
Moderate	4	40.0	27.7	369	26.8	20.8	16.0
Middle	1	10.0	22.4	130	9.5	20.8	21.0
Upper	3	30.0	28.6	747	54.3	43.1	40.0
Unknown	0	0.0	9.4	0	0.0	9.2	0.0
Total	10	100.0	100.0	1,375	100.0	100.0	100.0
Refinance Loans							
Low	1	14.3	9.2	52	14.1	5.5	22.9
Moderate	2	28.6	20.3	80	21.7	15.6	16.0
Middle	2	28.6	26.1	111	30.1	25.5	21.0
Upper	2	28.6	37.0	126	34.1	46.2	40.0
Unknown	0	0.0	7.4	0	0.0	7.3	0.0
Total	7	100.0	100.0	369	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.2	0	0.0	3.7	22.9
Moderate	0	0.0	14.1	0	0.0	11.6	16.0
Middle	1	100.0	29.4	15	100.0	24.3	21.0
Upper	0	0.0	44.6	0	0.0	54.8	40.0
Unknown	0	0.0	5.6	0	0.0	5.7	0.0
Total	1	100.0	100.0	15	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	3	16.7	10.1	181	10.3	5.7	22.9
Moderate	6	33.3	23.6	449	25.5	18.8	16.0
Middle	4	22.2	23.9	256	14.6	21.9	21.0
Upper	5	27.8	32.2	873	49.6	43.6	40.0
Unknown	0	0.0	10.2	0	0.0	10.1	0.0
Total	18	100.0	100.0	1,759	100.0	100.0	100.0
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 21300													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	15	65.2	15.3	1,032	60.4	8.6	9	40.9	12.5	780	36.8	7.7	22.9
Moderate	8	34.8	27.2	678	39.6	22.1	7	31.8	26.0	684	32.3	21.7	16.0
Middle	0	0.0	22.7	0	0.0	22.7	4	18.2	24.8	448	21.2	25.2	21.0
Upper	0	0.0	24.4	0	0.0	36.5	1	4.5	22.5	159	7.5	33.2	40.0
Unknown	0	0.0	10.4	0	0.0	10.1	1	4.5	14.2	46	2.2	12.1	0.0
Total	23	100.0	100.0	1,710	100.0	100.0	22	100.0	100.0	2,117	100.0	100.0	100.0
Refinance Loans													
Low	1	14.3	12.4	50	14.2	7.3	1	16.7	4.3	71	14.1	1.8	22.9
Moderate	4	57.1	20.2	235	66.8	13.7	3	50.0	12.8	223	44.3	7.8	16.0
Middle	1	14.3	21.0	22	6.3	17.8	2	33.3	23.8	209	41.6	19.6	21.0
Upper	0	0.0	29.4	0	0.0	36.9	0	0.0	42.4	0	0.0	52.0	40.0
Unknown	1	14.3	17.0	45	12.8	24.3	0	0.0	16.7	0	0.0	18.6	0.0
Total	7	100.0	100.0	352	100.0	100.0	6	100.0	100.0	503	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.6	0	0.0	5.9	0	0.0	2.9	0	0.0	4.3	22.9
Moderate	2	100.0	24.5	110	100.0	24.9	1	25.0	18.0	76	39.8	15.5	16.0
Middle	0	0.0	24.5	0	0.0	19.4	2	50.0	34.5	85	44.5	34.6	21.0
Upper	0	0.0	39.1	0	0.0	45.5	1	25.0	41.0	30	15.7	39.3	40.0
Unknown	0	0.0	4.3	0	0.0	4.3	0	0.0	3.6	0	0.0	6.4	0.0
Total	2	100.0	100.0	110	100.0	100.0	4	100.0	100.0	191	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	16	50.0	13.2	1,082	49.8	8.1	10	31.3	8.0	851	30.3	4.8	22.9
Moderate	14	43.8	24.0	1,023	47.1	19.6	11	34.4	18.5	983	35.0	14.5	16.0
Middle	1	3.1	22.4	22	1.0	21.0	8	25.0	24.4	742	26.4	22.4	21.0
Upper	0	0.0	27.6	0	0.0	36.7	2	6.3	31.8	189	6.7	41.2	40.0
Unknown	1	3.1	12.8	45	2.1	14.6	1	3.1	17.3	46	1.6	17.2	0.0
Total	32	100.0	100.0	2,172	100.0	100.0	32	100.0	100.0	2,811	100.0	100.0	100.0
Source: 2020 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2018 Small Business Lending By Income Level of Geography							
Assessment Area: New York State Nonmetropolitan AA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	4	2.3	3.1	419	1.5	6.9	4.0
Moderate	14	8.2	8.5	3,131	11.3	8.5	9.3
Middle	138	80.7	77.1	23,181	83.3	75.2	76.8
Upper	15	8.8	10.1	1,091	3.9	9.0	9.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	0.3	
Total	171	100.0	100.0	27,822	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: New York State Nonmetropolitan AA													
Geographi c Income Level	Bank And Aggregate Loans By Year											Total Businesses %	
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Low	1	0.7	3.0	100	0.7	3.6	14	2.2	3.6	798	1.5	5.8	4.0
Moderate	21	14.1	8.3	2,108	15.3	9.2	54	8.3	8.7	5,363	10.2	10.8	9.0
Middle	116	77.9	77.5	11,115	80.7	77.6	530	81.9	77.9	40,298	76.9	72.8	76.9
Upper	11	7.4	9.8	450	3.3	9.1	49	7.6	9.5	5,954	11.4	10.4	10.1
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	1.3	0	0.0	0.5	0	0.0	0.4	0	0.0	0.1	
Total	149	100.0	100.0	13,773	100.0	100.0	647	100.0	100.0	52,413	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Distribution of 2018 Small Business Lending By Revenue Size of Businesses							
Assessment Area: New York State Nonmetropolitan AA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	104	60.8	48.9	5,307	19.1	33.5	88.1
Over \$1 Million	67	39.2		22,515	80.9		8.9
Revenue Unknown	0	0.0		0	0.0		3.0
Total	171	100.0		27,822	100.0		100.0
By Loan Size							
\$100,000 or Less	104	60.8	89.9	2,962	10.6	30.3	
\$100,001 - \$250,000	31	18.1	5.5	6,135	22.1	18.9	
\$250,001 - \$1 Million	36	21.1	4.6	18,725	67.3	50.9	
Total	171	100.0	100.0	27,822	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	89	85.6		2,249	42.4		
\$100,001 - \$250,000	12	11.5		2,058	38.8		
\$250,001 - \$1 Million	3	2.9		1,000	18.8		
Total	104	100.0		5,307	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses													
Assessment Area: New York State Nonmetropolitan AA													
	Bank And Aggregate Loans By Year											Total Businesses %	
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
By Revenue													
\$1 Million or Less	108	72.5	46.2	2,666	19.4	31.6	561	86.7	36.9	36,836	70.3	25.2	88.5
Over \$1 Million	41	27.5		11,107	80.6		86	13.3		15,577	29.7		8.6
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		2.9
Total	149	100.0		13,773	100.0		647	100.0		52,413	100.0		100.0
By Loan Size													
\$100,000 or Less	125	83.9	92.4	3,228	23.4	36.7	518	80.1	86.3	15,208	29.0	32.1	
\$100,001 - \$250,000	9	6.0	4.2	1,418	10.3	17.6	81	12.5	8.4	13,568	25.9	23.5	
\$250,001 - \$1 Million	15	10.1	3.4	9,127	66.3	45.7	48	7.4	5.2	23,637	45.1	44.3	
Total	149	100.0	100.0	13,773	100.0	100.0	647	100.0	100.0	52,413	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	104	96.3		2,060	77.3		484	86.3		13,124	35.6		
\$100,001 - \$250,000	4	3.7		606	22.7		47	8.4		7,929	21.5		
\$250,001 - \$1 Million	0	0.0		0	0.0		30	5.3		15,783	42.8		
Total	108	100.0		2,666	100.0		561	100.0		36,836	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 40380							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	8	3.2	7.4	3,050	5.7	8.1	8.6
Moderate	26	10.3	12.2	4,958	9.3	10.8	13.3
Middle	153	60.7	44.2	26,784	50.4	44.2	46.2
Upper	65	25.8	35.2	18,300	34.5	36.3	31.7
Unknown	0	0.0	0.1	0	0.0	0.3	0.2
Tract-Unk	0	0.0	1.0	0	0.0	0.3	
Total	252	100.0	100.0	53,092	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 40380													
Geographi c Income Level	Bank And Aggregate Loans By Year											Total Businesses %	
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Low	6	3.2	7.3	1,253	4.4	8.7	36	4.9	8.1	6,539	9.5	9.9	8.7
Moderate	28	15.0	11.0	4,888	17.1	13.3	106	14.5	10.9	7,599	11.0	12.2	13.2
Middle	102	54.5	44.8	9,038	31.6	43.7	414	56.5	44.5	36,545	52.8	44.0	45.8
Upper	51	27.3	35.7	13,461	47.0	33.8	176	24.0	36.1	18,492	26.7	33.5	32.1
Unknown	0	0.0	0.1	0	0.0	0.2	1	0.1	0.1	10	0.0	0.3	0.2
Tract-Unk	0	0.0	1.0	0	0.0	0.3	0	0.0	0.2	0	0.0	0.1	
Total	187	100.0	100.0	28,640	100.0	100.0	733	100.0	100.0	69,185	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Distribution of 2018 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 40380							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	142	56.3	44.8	12,905	24.3	29.6	89.3
Over \$1 Million	110	43.7		40,187	75.7		9.6
Revenue Unknown	0	0.0		0	0.0		1.1
Total	252	100.0		53,092	100.0		100.0
By Loan Size							
\$100,000 or Less	140	55.6	92.3	4,824	9.1	33.1	
\$100,001 - \$250,000	38	15.1	3.8	7,851	14.8	15.7	
\$250,001 - \$1 Million	74	29.4	3.9	40,417	76.1	51.2	
Total	252	100.0	100.0	53,092	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	112	78.9		2,947	22.8		
\$100,001 - \$250,000	15	10.6		2,868	22.2		
\$250,001 - \$1 Million	15	10.6		7,090	54.9		
Total	142	100.0		12,905	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 40380													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	129	69.0	45.3	10,870	38.0	31.5	609	83.1	33.4	44,652	64.5	21.6	89.9
Over \$1 Million	58	31.0		17,770	62.0		124	16.9		24,533	35.5		9.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.1
Total	187	100.0		28,640	100.0		733	100.0		69,185	100.0		100.0
By Loan Size													
\$100,000 or Less	132	70.6	93.6	3,840	13.4	37.5	560	76.4	86.9	17,718	25.6	32.9	
\$100,001 - \$250,000	20	10.7	3.3	3,708	12.9	15.8	101	13.8	7.8	16,233	23.5	21.9	
\$250,001 - \$1 Million	35	18.7	3.1	21,092	73.6	46.7	72	9.8	5.2	35,234	50.9	45.3	
Total	187	100.0	100.0	28,640	100.0	100.0	733	100.0	100.0	69,185	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	105	81.4		2,443	22.5		513	84.2		14,985	33.6		
\$100,001 - \$250,000	11	8.5		1,858	17.1		60	9.9		9,364	21.0		
\$250,001 - \$1 Million	13	10.1		6,569	60.4		36	5.9		20,303	45.5		
Total	129	100.0		10,870	100.0		609	100.0		44,652	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 15380 (Erie County)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	9	13.0	9.3	4,022	18.0	12.0	9.0
Moderate	9	13.0	9.9	3,618	16.2	12.6	10.8
Middle	21	30.4	34.1	6,686	29.9	28.2	35.6
Upper	28	40.6	43.3	7,665	34.2	43.0	40.6
Unknown	2	2.9	2.7	400	1.8	3.8	4.0
Tract-Unk	0	0.0	0.8	0	0.0	0.4	
Total	69	100.0	100.0	22,391	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 15380 (Erie County)													
Geographi c Income Level	Bank And Aggregate Loans By Year											Total Businesses %	
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Low	5	9.1	10.4	2,352	10.5	11.0	22	8.5	9.3	4,248	13.3	10.2	9.4
Moderate	3	5.5	10.1	2,050	9.1	11.8	31	12.0	9.6	6,140	19.3	10.9	10.8
Middle	21	38.2	34.3	9,038	40.2	32.8	86	33.2	34.5	11,623	36.5	35.1	35.2
Upper	25	45.5	41.5	8,685	38.6	39.6	117	45.2	43.1	9,220	28.9	37.9	40.6
Unknown	1	1.8	2.9	350	1.6	4.6	3	1.2	3.3	655	2.1	5.8	3.9
Tract-Unk	0	0.0	0.8	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	
Total	55	100.0	100.0	22,475	100.0	100.0	259	100.0	100.0	31,886	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Distribution of 2018 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 15380 Erie County							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	28	40.6	43.5	4,446	19.9	29.2	88.5
Over \$1 Million	41	59.4		17,945	80.1		10.5
Revenue Unknown	0	0.0		0	0.0		1.0
Total	69	100.0		22,391	100.0		100.0
By Loan Size							
\$100,000 or Less	26	37.7	91.5	1,098	4.9	29.6	
\$100,001 - \$250,000	14	20.3	4.4	2,874	12.8	17.9	
\$250,001 - \$1 Million	29	42.0	4.1	18,419	82.3	52.6	
Total	69	100.0	100.0	22,391	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	20	71.4		665	15.0		
\$100,001 - \$250,000	3	10.7		388	8.7		
\$250,001 - \$1 Million	5	17.9		3,393	76.3		
Total	28	100.0		4,446	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 15380 Erie County													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	\$(000)	#	%	#%	\$(000)	%	\$(000)	
By Revenue													
\$1 Million or Less	36	65.5	42.3	11,135	49.5	32.9	202	78.0	39.0	21,720	68.1	23.4	88.9
Over \$1 Million	19	34.5		11,340	50.5		57	22.0		10,166	31.9		10.1
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.0
Total	55	100.0		22,475	100.0		259	100.0		31,886	100.0		100.0
By Loan Size													
\$100,000 or Less	19	34.5	92.8	921	4.1	32.5	174	67.2	84.2	6,617	20.8	28.0	
\$100,001 - \$250,000	4	7.3	3.4	834	3.7	14.9	49	18.9	9.1	8,133	25.5	22.1	
\$250,001 - \$1 Million	32	58.2	3.8	20,720	92.2	52.6	36	13.9	6.7	17,136	53.7	49.9	
Total	55	100.0	100.0	22,475	100.0	100.0	259	100.0	100.0	31,886	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	18	50.0		871	7.8		146	72.3		5,126	23.6		
\$100,001 - \$250,000	2	5.6		384	3.4		31	15.3		5,102	23.5		
\$250,001 - \$1 Million	16	44.4		9,880	88.7		25	12.4		11,492	52.9		
Total	36	100.0		11,135	100.0		202	100.0		21,720	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 21300							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	3	20.0	17.4	365	30.9	22.8	19.0
Moderate	1	6.7	14.4	5	0.4	20.3	12.3
Middle	2	13.3	39.2	122	10.3	24.8	43.6
Upper	9	60.0	27.9	688	58.3	31.6	25.1
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	
Total	15	100.0	100.0	1,180	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 21300													
Geographi c Income Level	Bank And Aggregate Loans By Year											Total Businesses %	
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Low	4	19.0	18.2	96	19.5	18.8	20	29.4	20.3	1,103	29.6	28.4	19.0
Moderate	3	14.3	12.0	20	4.1	20.3	15	22.1	14.4	870	23.3	19.0	12.3
Middle	9	42.9	40.0	193	39.1	26.2	21	30.9	38.5	753	20.2	27.9	42.5
Upper	5	23.8	28.9	184	37.3	34.2	12	17.6	26.7	1,001	26.9	24.5	26.1
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	1.0	0	0.0	0.4	0	0.0	0.2	0	0.0	0.2	
Total	21	100.0	100.0	493	100.0	100.0	68	100.0	100.0	3,727	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Small Business Lending By Revenue Size of Businesses							
Assessment Area: MSA 21300							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	12	80.0	37.9	770	65.3	25.2	87.3
Over \$1 Million	3	20.0		410	34.7		10.7
Revenue Unknown	0	0.0		0	0.0		1.9
Total	15	100.0		1,180	100.0		100.0
By Loan Size							
\$100,000 or Less	13	86.7	92.5	330	28.0	28.5	
\$100,001 - \$250,000	0	0.0	2.4	0	0.0	9.4	
\$250,001 - \$1 Million	2	13.3	5.1	850	72.0	62.1	
Total	15	100.0	100.0	1,180	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	11	91.7		270	35.1		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	1	8.3		500	64.9		
Total	12	100.0		770	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 21300													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	17	81.0	37.1	245	49.7	27.6	60	88.2	33.7	2,478	66.5	16.8	88.3
Over \$1 Million	4	19.0		248	50.3		8	11.8		1,249	33.5		10.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.5
Total	21	100.0		493	100.0		68	100.0		3,727	100.0		100.0
By Loan Size													
\$100,000 or Less	20	95.2	90.3	368	74.6	29.0	57	83.8	82.2	1,485	39.8	22.0	
\$100,001 - \$250,000	1	4.8	5.1	125	25.4	18.8	9	13.2	9.5	1,474	39.5	21.1	
\$250,001 - \$1 Million	0	0.0	4.6	0	0.0	52.2	2	2.9	8.3	768	20.6	56.9	
Total	21	100.0	100.0	493	100.0	100.0	68	100.0	100.0	3,727	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	17	100.0		245	100.0		55	91.7		1,401	56.5		
\$100,001 - \$250,000	0	0.0		0	0.0		4	6.7		654	26.4		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	1.7		423	17.1		
Total	17	100.0		245	100.0		60	100.0		2,478	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

APPENDIX B
SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		Lending: January 1, 2018 – December 31, 2020 Community Development Activity: October 1, 2018 – December 31, 2021	
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
Five Star Bank 29 North Main Street, Warsaw, NY 14203			Home Purchase Refinancing Home Improvement Small Business
AFFILIATE(S)	AFFILIATE RELATIONSHIP		
None			
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
STATE OF NEW YORK Non-Metropolitan, NY Assessment Area MSA 40380 (Rochester, NY) MSA 15380 (Buffalo-Cheektowaga, NY) MSA 21300 (Elmira, NY)	Full-scope review Full-scope review Full-scope review Full-scope review	None	None

CRA APPENDIX C

GLOSSARY

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

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

Community development: Affordable housing (including multi-family rental housing) for LMI individuals; community services targeted to LMI 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 LMI geographies.

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

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

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 multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

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

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

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

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

Metropolitan Division: A county or group of counties within a **Metropolitan Statistical Area** that contains a population of at least 2.5 million and represents an employment center(s) associated through commuting ties.

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

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

Multi-family: Refers to a residential structure that contains five or more units.

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

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

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 "loans to small businesses" as defined in the Consolidated Report of Condition and Income ("Call Report") and the Thrift Financial Reporting ("TFR") instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in "loan 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 either are 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% of the area median income, or a median family income that is more than 120%, in the case of a geography.

CRA APPENDIX D

Five Star Bank

2018-2020 Assessment Areas

