

PUBLIC DISCLOSURE

December 5, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Adirondack Trust Company
RSSD No. 645317

473 Broadway
Saratoga Springs, NY 12866

Federal Reserve Bank of New York

33 Liberty Street
New York, NY 10045

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

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

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

SCOPE OF EXAMINATION

Procedures

ATC's CRA performance was evaluated using the Federal Financial Institutions Examination Council's (“FFIEC”) Interagency Intermediate Small Institution Examination Procedures. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, market competition, assessment area demographics and credit and community development needs. The bank was not a CRA small business reporter during the evaluation period, but all small business loans originated between January 1, 2018, and December 31, 2021, were analyzed.

As shown in the table below, the lending test evaluation covered the period from January 1, 2018, to December 31, 2021. The evaluation of ATC’s community development activities covered the period from January 1, 2019, to September 30, 2022.

PERFORMANCE CRITERIA	EVALUATION PERIOD
Loan-to-Deposit Ratio	January 1, 2018 - December 31, 2021
Lending in Assessment Areas	January 1, 2018 - December 31, 2021
Borrower Distribution of Loans	January 1, 2018 - December 31, 2021
Geographic Distribution of Loans	January 1, 2018 - December 31, 2021
Response to CRA Complaints	January 1, 2018 - December 31, 2021
Community Development Lending	January 1, 2019 – September 30, 2022
Community Development Qualified Investments	January 1, 2019 - September 30, 2022
Community Development Services	January 1, 2019 - September 30, 2022

Products

Retail loan products evaluated included home purchase, home refinance, home improvement, multifamily, and small business loans. Home mortgage loans were reported under the Home Mortgage Disclosure Act (“HMDA”). Examiners verified the integrity of the 2018, 2019, 2020, and 2021 HMDA loan data, as well as small business lending data collected and provided by the bank, as the bank is not a small business reporter. Multifamily loans were also considered in the evaluation of community development lending. In analyzing the combined HMDA and small business lending data, the greatest weight, based on number and volume was given to small business lending followed by HMDA lending due to the make-up of the bank’s portfolio and combined lending activity for the evaluation period.

Examiners reviewed the bank’s documentation to determine whether lending, investment, or services activities had community development as a primary purpose. 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 ATC’s assessment areas. Additionally, as ATC met the needs of its assessment areas, examiners considered community development activities that were conducted in the broader statewide or regional area (“BSRA”) that included its assessment areas. In accordance with CA Letter 21-5 CRA Consideration for Activities in Response to the Coronavirus, and its attachments, examiners also considered qualified community development activities supporting community needs related to the COVID-19 pandemic located outside of the assessment area or BSRA.

Lending Distribution Analysis

The geographic and borrower loan distribution analyses were based on loan activity conducted in ATC’s assessment areas. To evaluate the geographic distribution of loans, the proportion of home purchase, home refinance, and home improvement loan originations located in low- and moderate-income (“LMI”) geographies was compared to the assessment area demographic of owner-occupied housing units and multi-family lending was compared to multi-family units, located in LMI geographies of the assessment areas. For small business loans, the analysis compared the proportion of loan originations located in LMI geographies with the assessment area demographic of small businesses located in LMI geographies, based on Dun & Bradstreet (“D&B”) data. Performance in low-income and in moderate-income geographies were analyzed separately.

To analyze the distribution of HMDA related loans by borrower profile, the proportion of originations to LMI borrowers was compared to the assessment area demographic of LMI families

residing in the assessment areas. Median family income (“MFI”) estimates from the FFIEC were used to categorize borrower income. For small business lending, ATC’s proportion of loans to businesses with gross annual revenues of \$1 million or less, was compared to the assessment area demographic of all such businesses located in the assessment areas based on D&B data. The size of the small business loans was also used as a proxy to identify lending to businesses with gross annual revenues of \$1 million or less.

ATC’s HMDA lending performance was also compared to the respective year’s performance of the market aggregate of all lenders in the assessment area subject to HMDA loan reporting. Peer data was used for the loan-to-deposit analysis. Local peer banks were selected based on the asset size, location, portfolio mix, and number of branches in order to choose banks similarly-sized to ATC within their assessment areas. ATC’s loan-to-deposit ratio was also compared to its national peer group. ATC’s performance in making community development loans and qualified investments was also compared with peer banks in ATC’s assessment areas. As ATC is not a small business reporter, small business data was compared only to the demographic and not aggregate lending activity.

Community Contacts

To obtain input on community credit needs, examiners conducted a community contact interview with a representative of a Community Development Financial Institution (“CDFI”) that addressed economic development. The community contact stated that local economic conditions have become more challenging with housing, rent and the cost of living rising. The community contact observed that there is a need to fund startup costs to support small businesses in LMI communities and expressed the need for affordable housing and new job opportunities within the communities. The community contact also noted that large investments for economic development are needed.

DESCRIPTION OF INSTITUTION

ATC is a state member bank headquartered in Saratoga Springs, New York with total assets of \$1.6 billion as of September 30, 2022. ATC operates 14 full-service branch locations, including its main office, in Saratoga and Warren Counties, as well as two insurance offices in Saratoga Springs and Albany, New York. The bank offers a variety of traditional community banking services, including consumer and commercial deposit and lending products and services.

ATC is the sole subsidiary of 473 Broadway Holding Corp. (“473 BHC”), a bank holding company. ATC has three subsidiaries: (1) Adirondack Trust Company Financial Services, Inc. (“ATCFSI”), which operates under the trade name Amsure (an insurance agency that offers commercial, small business, employee benefits and personal insurance products throughout the Saratoga region); (2) Adirondack REIT Inc. (a real estate investment trust that holds certain qualifying real estate loans); and (3) 2961 Route 9 LLC that was formed in 2010 to hold other real estate owned.

ATC offers a variety of consumer and commercial loan and deposit products. Consumer loan products include residential mortgages and construction loans, home equity loans and lines of credit, home improvement loans, unsecured personal loans, and credit card products. Commercial loan products include commercial mortgages, term loans, lines of credit, construction loans, multifamily loans, business credit cards and small business loans. Deposit products include checking, savings, and money market deposit accounts.

According to the June 30, 2022 Federal Deposit Insurance Corporation (“FDIC”) Deposit Market Share Report, the bank had the second largest deposit market share of the 18 FDIC-insured institutions located in the assessment area.

As of September 30, 2022, ATC had total assets of \$1.6 billion, gross loans and leases of \$890.7 million and total deposits of \$1.5 billion. Of the total gross loans and leases, 43.0% are secured by commercial real estate and 23.5% are secured by one-to-four-family residential real estate, including residential construction loans. Based on the September 30, 2022 Call Report, ATC’s loan portfolio, by dollar volume, is summarized in the subsequent table.

Loan Type	Dollar Amount (000)	Percent of Gross Loans & Leases
1-4 Residential Real Estate Secured	\$209,505	23.5%
Construction	\$46,024	5.2%
Multifamily Dwelling	\$93,034	10.4%
HELOCs	\$41,893	4.7%
Loans to Individuals	\$14,896	1.7%
Commercial & Industrial	\$92,888	10.4%
Nonfarm Nonresidential Secured	\$383,254	43.0%
Other	\$9,237	1.0%
Total	\$890,731	100.0%

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

Based on the September 30, 2022, Uniform Bank Performance Report, ATC’s deposit portfolio by dollar volume was comprised of Demand Deposits, Money Market Deposit Accounts, and other Savings Deposits as summarized in the following table.

Deposit Type	Dollar Amount (000)	Percent of Total Deposits
Demand Deposits	\$504,403	34.6%
NOW and ATS Accounts	\$212,660	14.6%
Money Market Deposit Accounts	\$373,281	25.6%
Other Savings Deposits	\$156,910	10.8%
Time Deposits at or below Insurance Limit	\$165,673	11.4%
Time Deposits above Insurance Limit	\$45,844	3.1%
Total	\$1,458,771	100.0%

Source: Uniform Bank Performance Report as of September 30, 2022.

Previous Public Evaluation

ATC’s previous CRA evaluation was conducted as of March 11, 2019, using the FFIEC Interagency Intermediate Small Institution Examination Procedures. The prior evaluation resulted in an overall rating of Satisfactory. There were no known legal, financial, or other factors that would prevent ATC from fulfilling its responsibility under CRA.

DESCRIPTION OF ASSESSMENT AREAS

ATC maintained two delineated assessment areas located in upstate New York. The full scope assessment area was identified based on the branch presence and the significance of the bank's lending and deposit activities within that geographic area as compared to the remaining assessment area where a limited scope review was conducted. The assessment areas consisted of the following:

Full Scope Assessment Area:

ATC's full scope assessment area is located in Metropolitan Statistical Area ("MSA") 10580 (Albany-Schenectady-Troy, NY), which consisted of a portion of Saratoga County and excluded Albany, Rensselaer, Schenectady, and Schoharie Counties. The assessment area contained 30 census tracts, of which there were no low-income census tracts, 5 were moderate-income, 24 were middle- and upper-income, and 1 was designated as an unknown-income census tract.

ATC's performance in MSA 10580 (Albany-Schenectady-Troy, NY) received the most weight in determining the bank's overall CRA rating because a majority of the bank's branch locations (11 of 14) were located in the assessment area. Additionally, the assessment area had 95.3% of total deposits as of June 30, 2022, as well as 64.5% of the total combined HMDA and small business loans during the evaluation period.

Limited Scope Assessment Area:

ATC's limited scope assessment area is located in MSA 24020 (Glens Falls, NY), which consisted of a portion of Warren County and excluded Washington County. The assessment area had 13 census tracts, of which there were no low-income census tracts, 2 were moderate-income, and 11 were middle- and upper-income census tracts. The combined HMDA and small business loans in the assessment area represented 15.9% of the total HMDA and small business lending during the evaluation period. As of June 30, 2022, the bank had 4.7 percent of its deposits in the assessment area. The bank maintained two branches in the assessment area between 2018 and 2021 and opened a third branch location in 2022.

There were no changes to the bank's two delineated CRA assessment areas since the prior CRA evaluation conducted as of March 11, 2019. ATC's assessment areas were in compliance with the requirements of Section 228.41 of Regulation BB and did not arbitrarily exclude LMI geographies. A map illustrating the bank's assessment areas is in CRA Appendix A.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

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

ATC participated in the Small Business Administration (“SBA”) Paycheck Protection Program (“PPP”) and originated 1,570 PPP loans totaling \$163 million. PPP loans provided a direct benefit to small businesses adversely affected by the COVID-19 pandemic and is considered particularly responsive to acute credit needs during that time. Additionally, the substantial majority of ATC’s PPP loans were made in amounts under \$1 million. The bank’s participation in this lending program met the credit needs of particularly small businesses, where 1,178 or 75.0% of PPP loans were loans under \$100,000.

Loan-to-Deposit Ratio

ATC’s loan-to-deposit ratio was reasonable given the bank’s size, financial condition, and the credit needs of its assessment area. ATC’s average loan-to-deposit ratio for the 18 quarters between January 1, 2018, and June 30, 2022, was 65.4%, based on information contained in its Consolidated Report of Condition and Income. This ratio was below the national peer average of 80.6% and below an average of 78.2% for two similarly situated banks with branches located in ATC’s assessment areas during the evaluation period. ATC’s average loan-to-deposit ratio decreased from the prior CRA evaluation period when the bank had an average loan-to-deposit ratio of 71.7%.

Lending in Assessment Areas

ATC originated a substantial majority of its total loans in its assessment areas; 76.6% by dollar and 80.4% by number over the evaluation period January 1, 2018, to December 31, 2021. Additional details on the bank’s originations of HMDA and small business loans within its assessment area over the same period are shown in the subsequent tables.

The bank’s HMDA lending activity between calendar years 2018 and 2021 was located primarily within the assessment areas. During this period, ATC originated or purchased 83.3% of its HMDA loans within the assessment areas by number and 82.8% by dollar volume. Small business lending activity between 2018 and 2021, was concentrated primarily within the assessment areas. During the evaluation period ATC originated 79.2% of total small business loans by number and 69.8% by dollar volume inside the assessment areas.

Lending Inside and Outside the Assessment Areas January 1, 2018 to December 31, 2021								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	58	84.1	\$3,948	73.5	11	15.9	\$1,420	26.5
Home Purchase	370	79.4	\$103,173	79.5	96	20.6	\$26,578	20.5
Multi-Family	40	81.6	\$50,597	83.9	9	18.4	\$9,697	16.1
Refinancing	386	87.5	\$104,364	86.2	55	12.5	\$16,746	13.8
Total HMDA related	854	83.3	\$262,082	82.8	171	16.7	\$54,441	17.2
Small Business - Other Lines/Loans	22	75.9	\$4,627	75.6	7	24.1	\$1,494	24.4
Small Business	1,950	79.3	\$200,692	69.7	510	20.7	\$87,182	30.3
Total Small Bus. related	1,972	79.2	\$205,319	69.8	517	20.8	\$88,676	30.2

TOTAL LOANS	2,826	80.4	\$467,401	76.6	688	19.6	\$143,117	23.4
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Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

ATC’s overall lending distribution among borrowers of different income levels, including LMI individuals, and businesses of different sizes was reasonable based primarily on reasonable penetration in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area. The proportion of originations to LMI borrowers was considered reasonable relative to the market aggregate and the percentages of LMI families for HMDA-related lending.

Geographic Distribution of Loans

ATC’s overall geographic distribution of loans was reasonable based primarily on reasonable dispersion in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

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

During the evaluation period, ATC’s community development loans and qualified investments totaled \$89.7 million, comprising of approximately \$82.6 million in community development loans and \$7.2 million in qualified investments. When compared to two other institutions operating within the assessment area, ATC’s annualized community development loans were ranked 2nd based on tier 1 capital and ranked 1st for annualized investments. The bank ranked 2nd to peers in community development loans to average assets. The bank’s community development volume increased substantially from the \$37.6 million reported at the last evaluation. In addition, in accordance with CA Letter 21-5, PPP loans in amounts greater than \$1 million may be considered as community development loans if they also have a primary purpose of community development as defined under the CRA. ATC made seven PPP loans for a total of \$9.2 million that were included for consideration as qualified community development loans.

The majority of ATC’s community development loans by number were made within the bank’s assessment areas. However, by dollar, an additional \$41.3 million or 50.0% was originated to organizations which promote community development in the BSRA that included the bank’s assessment area. The subsequent table illustrates the community development lending and investment activity during the evaluation period of January 1, 2019 to September 30, 2022.

Summary of Community Development Loans and Qualified Investments January 1, 2019 to September 30, 2022						
Geography or Assessment Area	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
MSA 10580 (Albany-Schenectady-Troy, NY)	26,816	16	1,937	2	28,753	18
MSA 24020 (Glens Falls, NY)	14,475	11	820	2	15,295	13
Broader Statewide Regional Area	41,271	20	4,430	14	45,701	34
Total	82,562	47	7,187	18	89,749	65

ATC’s community development lending and investments exhibited excellent responsiveness to community needs. In terms of dollar amount, revitalization and stabilization activities represented the majority of total activity at 46.9%, economic development represented 29.3%, and affordable housing represented 21.7% of total community development lending and investment activity. The following chart details ATC’s community development loans and qualified investments by designation.

Summary of Community Development Loans and Qualified Investments By Primary Purpose Designation January 1, 2019 to September 30, 2022						
Designation	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
Affordable Housing	17,363	15	2,111	2	19,474	17
Community Services	1,925	3	0	0	1,925	3
Economic Development	26,297	19	0	0	26,297	19
Revitalize and Stabilize	36,976	10	5,075	16	42,051	26
Total	82,561	47	7,186	18	89,747	65

The totals in this and the above table are different due to rounding.

ATC continued its leadership in charitable giving and investment in its assessment areas. The Adirondack Trust Company Community Fund (“ATCCF”), an ATC established public charity, made charitable grants on the bank’s behalf. In addition to ATCCF charitable giving, the bank also provided 359 contributions to organizations, which supported community services to LMI individuals and households in the bank’s assessment areas. The bank’s donations and grants during the evaluation period totaled \$1.6 million.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

METROPOLITAN AREA

MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)

FULL REVIEW

DESCRIPTION OF OPERATIONS IN MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)

ATC's banking activities within its assessment areas were primarily conducted within the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area. The bank operated 11 of its 14 branches in this assessment area. As of June 30, 2022, these branches generated approximately \$1.4 billion in deposits. The branches in this assessment area accounted for 95.3% of the bank's total deposits as of June 30, 2022. The bank's lending activity was primarily within this assessment area; of the bank's total HMDA related loans during the evaluation period (1,025), 68.1% (698 loans) were originated in this assessment area. Of the total 2,489 small business loans, 63.1% or 1,570 were originated in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area.

ATC's market area is competitive with branches of local and regional banks operating in the assessment area. ATC had the largest deposit market share in the assessment area at 21.6%. Primary bank competitors in this assessment area included KeyBank, Citizens Bank, and Bank of America.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe this assessment area and to evaluate the context in which the bank operated. The information was obtained from publicly available sources, including the 2011-2015 U.S. Census Bureau American Community Survey ("2015 ACS"), U.S. Department of Labor ("DOL"), Dun and Bradstreet ("D&B"), FFIEC, and U.S. Department of Housing and Urban Development ("HUD"). The current evaluation period occurred during the 2015 ACS; therefore, all data below is applicable to each year of the evaluation period unless specifically stated otherwise. It should be noted that the bank had no low-income census tracts in its assessment areas throughout the evaluation period.

Demographic Characteristics

The MSA 10580 (Albany-Schenectady-Troy, NY) assessment area included portions of Saratoga County. According to the 2015 ACS, the population of the assessment area was 141,586. The assessment area consisted of 30 census tracts, of which none were low-income, 5 or 16.7% were moderate-income, 20 or 66.7% were middle-income, 4 or 13.3% were upper-income, and 1 or 3.3% were of unknown-income.

Income Characteristics

Based on the 2015 ACS data, the portions of Saratoga County that comprised the assessment area within MSA 10580 had 36,563 families, of which 17.4% were low-income (4.7% of which were below the poverty level), 19.0% were moderate-income, 22.2% were middle-income, and 41.4% were upper income.

MSA 10580 (Albany-Schenectady-Troy, NY) Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$88,478	\$87,551	-1.05%
MSA 10580 (Albany-Schenectady-Troy, NY)	\$81,387	\$81,103	-0.35%
New York State	\$73,401	\$71,913	-2.03%
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey. Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

Housing Characteristics

Based on the 2015 ACS data, the portions of Saratoga County that comprised the assessment area within MSA 10580 had 62,498 housing units, of which 63.2% were owner-occupied, 27.2% were rental, and 9.6% were vacant. Of the total housing units, 10.7% were in moderate-income tracts, 74.3% in middle-income tracts, and 15.0% in upper-income tracts. In moderate-income census tracts, 56.7% of housing units were owner-occupied, 35.8% were rental units, and 7.5% were vacant. The median age of housing stock in the assessment area was 42 years old, with 24.0% of the stock built before 1950. According to the 2015 ACS, the median housing value in the assessment area was \$219,155, with an affordability ratio of 31.1. The median gross rent in the assessment area was \$979 per month.

Geographic Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$219,155	31.05	\$979
Saratoga County	\$232,900	30.70	\$993
MSA 10580 (Albany-Schenectady-Troy, NY)	\$197,422	31.55	\$909
New York State	\$283,400	20.91	\$1,132

Housing Cost Burden

Housing costs were relatively expensive in the assessment area and a community contact indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD's 2014-2018 Comprehensive Housing Affordability Strategy data, within the assessment area, 35.2% of all rental households had rental costs that exceeded 30% of their incomes, 77.9% of low-income rental households had rental costs that exceeded 30% of their income, and 37.5% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within the assessment area, 18.8% of homeowners had housing costs that exceeded 30% of their incomes, 67.9% of low-income homeowners had housing costs that exceeded 30% of their income, and 37.8% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

MSA 10580 (Albany-Schenectady-Troy, 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	77.9%	37.5%	35.2%	67.9%	37.8%	18.8%
MSA 10580 (Albany-Schenectady-Troy, NY)	77.0%	36.6%	42.2%	65.9%	37.3%	18.9%
New York State	77.0%	48.6%	48.0%	73.8%	46.0%	27.4%

*Cost Burden is housing cost that equals 30 percent or more of household income.
Source: HUD, 2014-2018 Comprehensive Housing Affordability Strategy.*

Labor, Employment and Economic Characteristics

According to D&B data, there were 6,457 businesses operating in the assessment area in 2018, of which 8.2% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.8% were small businesses with gross annual revenues of \$1 million or less, of which 8.2% were located in moderate-income geographies. There were 6,437 businesses operating in the assessment area in 2019, of which 8.2% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 92.0% were small businesses with a gross annual revenues of \$1 million or less, of which 8.2% were located in moderate-income geographies. There were 6,531 businesses operating in the assessment area in 2020, of which 7.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 92.2% were small businesses with gross annual revenues of \$1 million or less, of which 7.7% were located in moderate-income geographies. There were 6,377 businesses operating in the assessment area in 2021, of which 7.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 92.2% were small businesses with gross annual revenues of \$1 million or less, of which 7.7% were located in moderate-income geographies.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.5% in 2018, decreased to 3.2% in 2019, increased to 6.4% in 2020, and decreased to 3.8% in 2021. The state of New York had an unemployment rate of 4.1% in 2018, decreased to 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021. Higher unemployment rates in 2020 were primarily related to the COVID-19 pandemic.

MSA 10580 (Albany-Schenectady-Troy, NY) - Unemployment Rates				
Area	2018	2019	2020	2021
Assessment Area	3.5%	3.2%	6.4%	3.8%
MSA 10580 (Albany-Schenectady-Troy, NY)	3.8%	3.5%	6.9%	4.3%
New York State	4.1%	3.8%	9.9%	6.9%

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

The subsequent tables provide a summary of the Assessment Area for the most recent year.

Combined Demographics Report

MSA 10580 (Albany-Schenectady-Troy, NY) Assessment Area 2021 Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	6,349	17.4
Moderate-income	5	16.7	3,810	10.4	401	10.5	6,961	19
Middle-income	20	66.7	27,745	75.9	1,167	4.2	8,119	22.2
Upper-income	4	13.3	5,008	13.7	152	3	15,134	41.4
Unknown-income	1	3.3	0	0	0	0	0	0
Total Assessment Area	30	100	36,563	100	1,720	4.7	36,563	100
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6,706	3,800	9.6	56.7	2,403	35.8	503	7.5
Middle-income	46,445	30,240	76.5	65.1	11,673	25.1	4,532	9.8
Upper-income	9,347	5,489	13.9	58.7	2,903	31.1	955	10.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	62,498	39,529	100	63.2	16,979	27.2	5,990	9.6
	Total Businesses by Tract	Businesses 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	495	7.8	452	7.7	30	7.3	13	14.8
Middle-income	4,303	67.5	3,961	67.4	280	68.5	62	70.5
Upper-income	1,578	24.7	1,466	24.9	99	24.2	13	14.8
Unknown-income	1	0	1	0	0	0	0	0
Total Assessment Area	6,377	100	5,880	100	409	100	88	100
	Percentage of Total Businesses:			92.2		6.4		1.4
	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	9	6.1	9	6.5	0	0	0	0
Middle-income	130	88.4	123	88.5	7	87.5	0	0
Upper-income	8	5.4	7	5	1	12.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	147	100	139	100	8	100	0	0
	Percentage of Total Farms:			94.6		5.4		0

Community Contacts

In order to learn more about community credit needs, examiners conducted a community contact interview with a representative of a CDFI serving this assessment area. The community contact stated that local economic conditions have become more challenging with housing, rent and the cost of living rising. There is a need for funding for startup cost to support small businesses in LMI communities, as well as affordable housing and new job opportunities within the communities. The community contact further noted that the communities need large investments for economic development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 10580 (ALBANY-SCHENECTADY-TROY, NY) ASSESSMENT AREA LENDING TEST

ATC's record of meeting the credit needs of its assessment area through its lending performance was satisfactory. The geographic distribution of lending and penetration among individuals of different income levels and businesses of different sizes in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area was reasonable. The greatest weight, based on number and volume, was given to small business lending followed by HMDA lending.

ATC's 2018 through 2021 HMDA lending performance was compared to the respective year's market aggregate of all lenders required to report HMDA data within the assessment area. Refer to the Aggregate Comparison Loan Distribution Tables in CRA Appendix B for details of ATC's geographic distribution of lending and loan distribution by borrower income and business customers of different sizes.

Geographic Distribution of Loans

ATC's overall geographic distribution of HMDA-related and small business loans reflected reasonable dispersion throughout the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area. The evaluation was based on the geographic distribution of loans in moderate-income tracts as ATC's MSA 10580 (Albany-Schenectady-Troy, NY) assessment area contained no low-income census tracts. Lending dispersion in LMI tracts was poor for home purchase, home refinance, home improvement, multifamily, and reasonable for small business.

The bank's lending performance considered performance context factors which indicated that there were challenges in making loans in moderate-income census tracts due to lower owner-occupancy levels and increased poverty levels. According to 2015 ACS, owner-occupied housing units in MSA 10580 (Albany-Schenectady-Troy, NY), were 9.6% of total units, 35.8% were rental units, 7.5% were vacant and 10.5% of families were below the poverty level. Additionally, this assessment area only included five moderate-income census tracts.

Analysis of Lending Gaps

An analysis of lending gaps during the evaluation period indicated that ATC's penetration in census tracts of different income levels was excellent. ATC made HMDA and small business loans in a majority of the census tracts within the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area. In addition, as reflected in the subsequent table, ATC increased lending penetration in MSA

10580 (Albany-Schenectady-Troy, NY) over the evaluation period from 80% moderate income tract penetration in 2018 and 2019 to 100% moderate-income tract penetration in 2020 and 2021.

Lending Gap Analysis - MSA 10580			
January 1, 2018 - December 31, 2021			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
2018			
Low	0	0	NA
Moderate	5	1	80%
Middle	20	1	95%
Upper	4	0	100%
Income Unknown	1	1	0%
2019			
Low	0	0	NA
Moderate	5	1	80%
Middle	20	2	90%
Upper	4	0	100%
Income Unknown	1	1	0%
2020			
Low	0	0	NA
Moderate	5	0	100%
Middle	20	0	100%
Upper	4	0	100%
Income Unknown	1	1	0%
2021			
Low	0	0	NA
Moderate	5	0	100%
Middle	20	0	100%
Upper	4	0	100%
Income Unknown	1	1	0%

Home Purchase Loans

ATC's home purchase lending performance to moderate-income census tracts in the assessment area was poor. ATC's originations in moderate-income census tracts for the evaluation period remained below the percentage of owner-occupied units (9.6%) and aggregate lending performance in all years. In 2021, the bank made 3.0% of home purchase loans by number and 2.1% by dollar in moderate-income census tracts, which was significantly below the assessment area percentage of owner-occupied housing units and the market aggregate, which made 10.4% by number and 6.2% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made 2.6% of home purchase loans by number and 0.9% by dollar in moderate-income census tracts. The bank's 2020 home purchase lending performance was significantly below the percentage of owner-occupied housing units (9.6%) and the market aggregate which made 7.9% by number and 5.0% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made 5.9% of home purchase loans by number and 3.6% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the assessment area demographic of 9.6% of owner-occupied housing units located in moderate-income census tracts and the market aggregate, which made 9.2% by number and 5.7% by dollar of home purchase loans in moderate-income census tracts.

In 2018, the bank made 7.5% of home purchase loans by number and 4.1% by dollar in moderate-income census tracts. The bank's home purchase lending performance was comparable to the assessment area demographic of 9.6% of owner-occupied housing units located in moderate-income census tracts and the market aggregate, which made 8.2% by number and 5.1% by dollar of home purchase loans in moderate-income census tracts.

Home Refinance Loans

ATC's home refinance lending performance to moderate-income census tracts was poor. In 2021, the bank made 2.4% by number and 1.7% by dollar of home refinance loans in moderate-income census tracts. ATC's home refinance lending performance in moderate-income census tracts was significantly below the assessment area demographic of 9.6% of owner-occupied housing units located in moderate-income census tracts and below the market aggregate, which made 5.9% by number and 4.2% by dollar of home refinance loans in moderate-income census tracts.

In 2020, the bank made 4.2% by number and 2.5% by dollar of home refinance loans in moderate-income census tracts. ATC's home refinance lending performance in moderate-income census tracts was significantly below the assessment area demographic of 9.6% of owner-occupied housing units located in moderate-income census tracts and comparable to the market aggregate, which made 4.6% by number and 3.5% by dollar of home refinance loans in moderate-income census tracts.

In 2019, the bank made 4.3% by number and 2.5% by dollar of home refinance loans in moderate-income census tracts. ATC's home refinance lending performance in moderate-income census tracts was significantly below the assessment area demographic of 9.6% of owner-occupied housing units located in moderate-income census tracts and below the market aggregate, which made 7.0% by number and 4.6% by dollar of home refinance loans in moderate-income census tracts.

In 2018, the bank made 2.5% by number and 2.2% by dollar of home refinance loans in moderate-income census tracts. ATC's home refinance lending performance in moderate-income census tracts was significantly below the assessment area demographic of 9.6% of owner-occupied housing units located in moderate-income census tracts and the market aggregate, which made 7.3% by number and 5.1% by dollar of home refinance loans in moderate-income census tracts.

Home Improvement Loans

In all years 2018, 2019, 2020, and 2021, ATC's home improvement performance to moderate-income census tracts was poor. The bank did not make any home improvement loans in moderate-income census tracts. ATC's home improvement lending performance was significantly below the assessment area demographic of 9.6% of owner-occupied housing units and the market aggregate which made 0.8% by number and 0.6% by dollar of home improvement loans in moderate-income census tracts.

Multifamily Loans

The geographic distribution of multifamily loans reflected poor dispersion throughout the assessment area. In 2021, the bank made one loan in moderate-income census tracts and no loans in 2018, 2019 or 2020. For the majority of the evaluation period, ATC's lending was significantly below both the demographic and aggregate totals.

Small Business Loans

The geographic distribution of small business loans reflected reasonable dispersion throughout the assessment area. In 2021, the bank made 3.3% by number and 1.2% by dollar of small business loans in moderate-income census tracts. ATC's small business lending performance in moderate-income census tracts was significantly below the assessment area demographic of 7.8% of businesses located in moderate-income census tracts.

In 2020, the bank made 2.4% by number and 2.6% by dollar of small business loans in moderate-income census tracts. ATC's small business lending performance in moderate-income census tracts was significantly below the assessment area demographic of 7.8% of businesses located in moderate-income census tracts.

In 2019, the bank made 5.6% by number and 3.9% by dollar of small business loans in moderate-income census tracts. ATC's small business lending performance in moderate-income census tracts was below the assessment area demographic of 8.2% of businesses located in moderate-income census tracts.

In 2018, the bank made 4.7% by number and 2.8% by dollar of small business loans in moderate-income census tracts. ATC's small business lending performance in moderate-income census tracts was below the assessment area demographic of 8.2% of businesses located in moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, reasonable penetration among individuals of different income (including LMI) levels and businesses of different sizes.

Home Purchase Loans

The distribution of borrowers reflected, given the product lines offered, reasonable penetration among low-income borrowers and moderate-income borrowers for home purchase lending. In 2021, the bank made 12.1% by number and 7.9% by dollar to low-income borrowers and was below the assessment area demographic of 17.4% of low-income families in the assessment area. However, performance was significantly above market aggregate which made 7.4% by number and 3.7% by dollar to low-income families. Also in 2021, the bank's lending to moderate-income borrowers was 22.7% by number and 18.9% by dollar, which was comparable to the market aggregate of 22.9% by number, slightly above 16.7% by dollar, and exceeded or was comparable to the assessment area demographic of 19.0% moderate-income families in the assessment area.

In 2020, the bank made 10.4% by number and 6.5% by dollar to low-income borrowers and was below the assessment area demographic of 17.4% of low-income families in the assessment area.

Performance exceeded the market aggregate which made 9.0% by number and 4.9% by dollar to low-income families. The bank's lending to moderate-income borrowers was 16.9% by number and 12.2% by dollar, which was below the market aggregate of 25.5% by number and 19.8% by dollar, and comparable by number to the assessment area demographic of 19.0% moderate-income families in the assessment area.

In 2019, the bank made 4.4% by number and 2.0% by dollar to low-income borrowers and was significantly below the assessment area demographic of 17.4% of low-income families in the assessment area. Performance was comparable to the market aggregate which made 6.2% by number and 3.0% by dollar to low-income families. The bank's lending to moderate-income borrowers was 10.3% by number and 5.8% by dollar, which was significantly below the market aggregate of 22.0% by number and 16.2% by dollar, and below the assessment area demographic of 19.0% moderate-income families in the assessment area.

In 2018, the bank made 8.8% by number and 5.5% by dollar to low-income borrowers and was below the assessment area demographic of 17.4% of low-income families in the assessment area. Performance exceeded the market aggregate which made 5.6% by number and 2.9% by dollar to low-income families. The bank's lending to moderate-income borrowers was 6.3% by number and 4.1% by dollar, which was significantly below the market aggregate of 21.0% by number and 14.7% by dollar, and significantly below the assessment area demographic of 19.0% moderate-income families in the assessment area.

Home Refinance Loans

The distribution of borrowers reflected, given the product lines offered, reasonable penetration among low-income and moderate-income borrowers for home refinance lending. In 2021, the bank's lending to low-income borrowers was 4.9% by number and 2.0% by dollar and was comparable to the market aggregate at 6.3% by number and 3.5% by dollar. The bank's performance was significantly below the assessment area demographic of 17.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 15.4% by number and 10.2% by dollar, was below the market aggregate of 18.6% by number and 13.4% by dollar. The bank was also below the assessment area demographic of 19.0% moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 8.4% by number and 6.8% by dollar and exceeded the market aggregate of 5.8% by number and 3.3% by dollar. The bank's performance was significantly below the assessment area demographic of 17.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 13.7% by number and 8.5% by dollar, was below the market aggregate of 19.0% by number and 14.2% by dollar. The bank's performance was also below the assessment area demographic of 19.0% moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 10.0% by number and 5.5% by dollar and exceeded the market aggregate of 7.0% by number and 3.9% by dollar. The bank's performance was below the assessment area demographic of 17.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 10.0% by number and 6.4% by dollar was below the market aggregate of 17.5% by number and 12.5% by dollar. The bank's performance was also below the assessment area demographic of 19.0% moderate-income families in the assessment area.

In 2018, the bank did not make any loans to low-income borrowers. ATC's performance was significantly below the market aggregate of 8.3% by number and 4.8% by dollar. The bank's performance was also significantly below the assessment area demographic of 17.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 12.5% by number and 8.7% by dollar was below the market aggregate of 20.9% by number and 16.9% by dollar. The bank's performance was also below the assessment area demographic of 19.0% moderate-income families in the assessment area.

Home Improvement Loans

The distribution of borrowers reflected, given the product lines offered, reasonable penetration among low-income and moderate-income borrowers for home improvement lending. In 2021, the bank's lending to low-income borrowers was 40.0% by number and 67.3% by dollar and exceeded the market aggregate of 4.5% by number and 3.3% by dollar. The bank's performance exceeded the assessment area demographic of 17.4% of low-income families in the assessment area. The bank made no loans to moderate-income borrowers, which was significantly below the market aggregate of 15.1% by number and 13.5% by dollar, and significantly below the assessment area demographic of 19.0% of moderate-income families in the assessment area.

In 2020, the bank made no loans to low-income borrowers, which was significantly below the market aggregate of 5.0% by number and 3.2% by dollar. The bank's performance was significantly below the assessment area demographic of 17.4% of low-income families in the assessment area. The bank also made no loans to moderate-income borrowers, which was significantly below the market aggregate of 17.2% by number and 11.2% by dollar, and significantly below the assessment area demographic of moderate-income families in the assessment area of 19.0%.

In 2019, the bank's lending to low-income borrowers was 9.1% by number and 13.7% by dollar and exceeded the market aggregate of 6.7% by number and 5.1% by dollar. The bank's performance was below the assessment area demographic of 17.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 36.4% by number and 13.8% by dollar exceeded the market aggregate of 14.9% by number and 11.0% by dollar. The bank's performance exceeded by number but was below by dollar, the assessment area demographic of moderate-income families in the assessment area at 19.0%.

In 2018, the bank made no loans to low-income borrowers, which was significantly below the market aggregate of 6.0% by number and 4.6% by dollar. The bank's performance was significantly below the assessment area demographic of 17.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 21.4% by number and 9.4% by dollar exceeded the market aggregate of 16.7% by number but was below the aggregate's 12.9% by dollar. The bank's performance exceeded by number but was below by dollar, the assessment area demographic of moderate-income families in the assessment area at 19.0%.

Small Business Loans

The distribution of borrowers reflected, given the product lines offered, reasonable penetration among borrowers for small business lending. In 2021, the bank originated 14.9% of loans by number and 9.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the assessment area demographic of 92.2% of

businesses in the assessment area with gross annual revenues of \$1 million or less. The bank originated 73.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 13.1% of loans by number and 11.4% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the assessment area demographic of 92.2% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank originated 77.2% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 50.8% of loans by number and 57.3% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the assessment area demographic of 92.0% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank originated 69.8% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2018, the bank originated 55.2% of loans by number and 50.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the 91.8% of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank originated 69.8% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

COMMUNITY DEVELOPMENT TEST

ATC's performance under the community development test in the MSA 10580 (Albany-Schenectady-Troy, NY) is rated Outstanding. ATC demonstrated overall excellent responsiveness to the community development needs of this assessment area through community development loans, qualified investments, and community development services. The bank's responsiveness reflected the needs identified by a community contact. This assessment also considered ATC's capacity, the need and availability of opportunities for community development in the assessment area, and the performance of local competitors and their responsiveness to community development needs. Compared to the prior examination, the bank maintained a high level of responsiveness to the community for loans and investments. ATC performed an excellent number of community development activities when compared to peer institutions in this assessment area.

ATC participated in the SBA PPP and originated 1,570 PPP loans totaling \$163 million. Additionally, the substantial majority of ATC's PPP loans were made in amounts of under \$1 million. Bank participation in this lending program met the credit needs of particularly small businesses, where 1,178 or 75.0% of PPP loans were loans under \$100,000.

Summary of Community Development Loans and Qualified Investments MSA 10580 (Albany-Schenectady-Troy) NY Assessment Area By Primary Purpose Designation January 1, 2019 – September 30, 2022						
Designation	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
Affordable Housing	3,633	5	1,746	1	5,379	6
Community Services	1,550	2	0	0	1,550	2
Economic Development	12,883	8	0	0	12,883	8
Revitalize and Stabilize	8,750	1	190	1	8,940	2
Total	26,816	16	1,936	2	28,752	18

The bank’s overall community development loans and investment activity in MSA 10580 (Albany-Schenectady-Troy, NY) totaled \$28.8 million.

Community Development Loans

ATC made \$26.8 million in community development loans with 48.0% to economic development, 32.6% to revitalize and stabilize the community, and 13.5% to affordable housing. Examples of community development loans include:

- A \$2.5 million loan to a contractor to retain jobs in a moderate-income area that revitalized or stabilized moderate income geographies. The financing allowed the business to continue operating and retained jobs in the moderate-income tract where it is located.
- A \$300,000 loan to purchase a multi-family rental property to provide affordable housing. All units are below fair market rent, and the property is located in a moderate-income census tract.
- A \$5 million loan to a non-profit organization that makes loans to small businesses on favorable terms in order to reduce unemployment, promote employment opportunities, and enable communities to grow by encouraging the development and retention of industry. The organization serves the need of the broader statewide area that includes the bank’s assessment area.

Community Development Investments

Community development investment activity in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area consisted of \$1.9 million in qualified investments. Additionally, the bank also made over 300 qualified grants and donations, totaling \$1.6 million that primarily addressed community services. Examples of community development investments included:

- A \$500,000 investment that will be used for a water improvement project. The project benefitted an adjacent moderate-income census tract.
- ATC established ATCCF to continue its leadership in charitable giving and investments. ATCCF provided grants to organizations that support families experiencing food insecurities, provide mentorship programs that benefit LMI children, and assist individuals

and families facing homelessness. During the COVID-19 pandemic, ATC self-funded ATCCF through a \$77,000 donation.

Community Development Services

ATC provided 188 qualified community service activities. During the evaluation period, many members of the bank's staff, including senior management, were involved in roles at various organizations. Similar to the prior examination, the bank's staff members held leadership roles that included board of director (board), board members, trustee, and finance committee member. The organizations the bank supported provided services to LMI communities and individuals. Examples of community development services included:

- The Chairman of ATC's Board was a board member for an organization that supports economic development.
- A Senior Vice President was a member of the finance committee for a community service organization that provided services to low-and moderate-income individuals.
- The Vice President of Regulatory Affairs was a board member, member of the finance committee and governance committee for a nonprofit organization which provided programs for low-and moderate- income families through income-based scholarships.

METROPOLITAN AREA

MSA 24020 (GLENS FALLS, NY)

LIMITED REVIEW

DESCRIPTION OF INSTITUTION’S OPERATION IN MSA 24020 (GLENS FALLS, NY)

A limited evaluation of ATC’s performance in the MSA 24020 (Glens Falls, NY) assessment area was completed. The bank’s assessment area consisted of 13 census tracts in MSA 24020 (Glens Falls, NY), of which none were low-income tracts and two were moderate-income tracts. According to the 2015 ACS, the bank’s assessment area had a population of 49,064 which is significantly less than the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area. According to the 2021 FFIEC Census Data and D&B data, there were 2,809 businesses within the assessment area. ATC conducted 15.9% of its total lending activity in this assessment area during the evaluation period. The bank maintained two branches in the assessment area between 2018 and 2021 and opened a new branch in 2022. The subsequent table provides a summary of the Assessment Area Demographics for the MSA 24020 (Glens Falls, NY) Assessment Area:

Assessment Area Demographics MSA (Glens Falls, NY)				
Income Category	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	0.0
Moderate Income	2	15.4	4.4	7.1
Middle Income	9	69.2	73.7	72.2
Upper Income	2	15.4	21.9	20.7
Unknown	0	0.0	0.0	0.0
Total	13	100.0	100.0	100.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

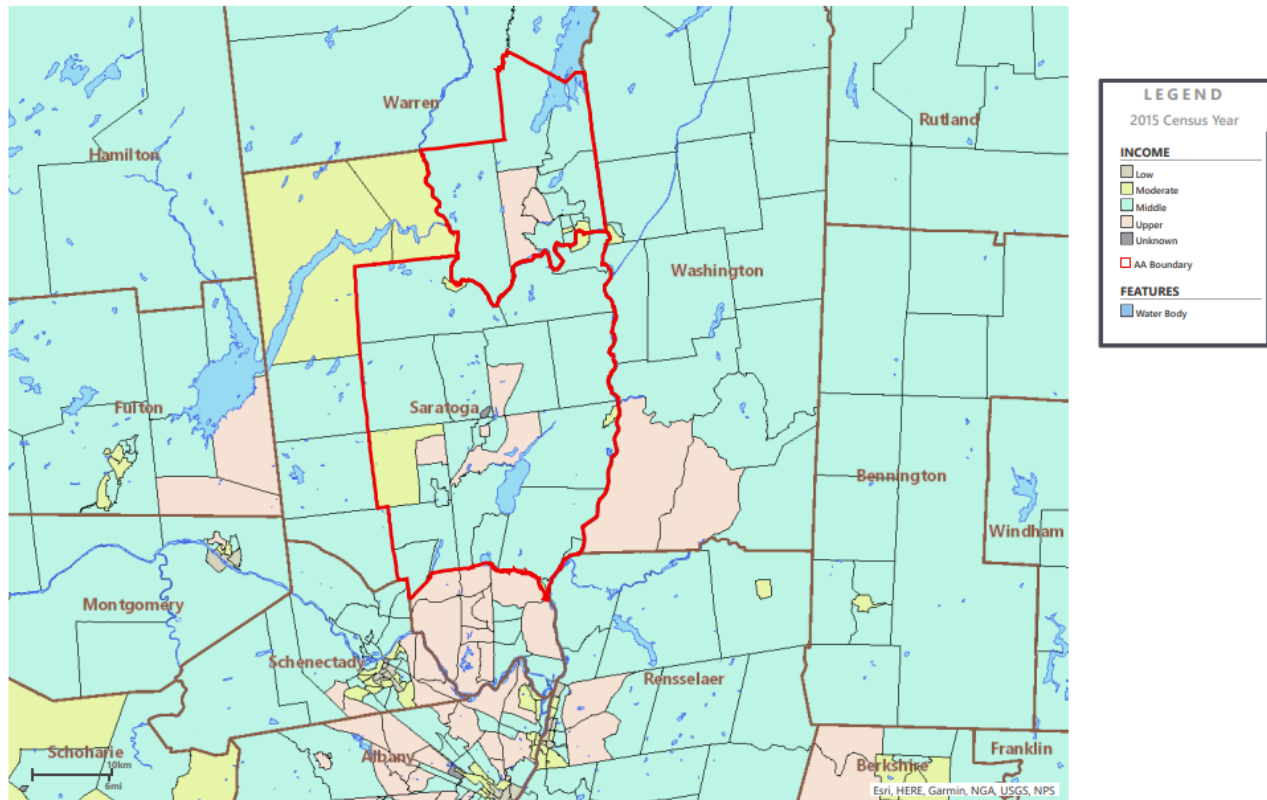
ATC’s performance in MSA 24020 (Glens Falls, NY) assessment area was consistent with its overall satisfactory performance, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Community Development Test
MSA 24020 (Glens Falls, NY)	Consistent	Consistent

During the evaluation period, ATC’s performance under the lending test was generally consistent with the bank’s overall Satisfactory performance. ATC’s penetration among individuals of different income levels and businesses of different sizes was reasonable. The geographic distribution of loans reflected a reasonable dispersion based on poor HMDA penetration of LMI geographies and reasonable small business penetration. Refer to the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix B for details of ATC’s 2018 through 2021 loan distribution by geography, borrower income and business revenue size. ATC’s

performance was generally consistent with its Outstanding performance under the Community Development Test. The bank's performance for the community development test demonstrated excellent responsiveness in the MSA 24020 (Glens Falls, NY) assessment area. ATC made \$14.5 million in community development loans and \$820,000 in community development investments in the MSA 24020 (Glens Falls, NY) assessment area. Community development performance exceeded performance at the prior evaluation when the bank reported \$4.5 million in community development loans and qualified investments.

CRA APPENDIX A MAP OF THE ASSESSMENT AREAS



CRA APPENDIX B
AGGREGATE COMPARISON LOAN DISTRIBUTION TABLES
Home Mortgage Lending by Income Level of Geography

Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	7.5	8.2	825	4.1	5.1	4	5.9	9.2	718	3.6	5.7	9.6
Middle	57	71.3	78.9	14,533	72.7	77.4	46	67.6	78.8	13,145	65.5	78.6	76.5
Upper	17	21.3	12.9	4,644	23.2	17.4	18	26.5	12.0	6,215	31.0	15.7	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	80	100.0	100.0	20,002	100.0	100.0	68	100.0	100.0	20,078	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	2.5	7.3	174	2.2	5.1	3	4.3	7.0	434	2.5	4.6	9.6
Middle	29	72.5	77.1	5,412	67.4	73.1	44	62.9	77.3	10,784	62.0	75.3	76.5
Upper	10	25.0	15.6	2,441	30.4	21.8	23	32.9	15.8	6,177	35.5	20.1	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	40	100.0	100.0	8,027	100.0	100.0	70	100.0	100.0	17,395	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.1	0	0.0	5.1	0	0.0	5.5	0	0.0	4.2	9.6
Middle	10	71.4	76.9	582	57.5	72.4	18	81.8	76.1	1,089	69.2	74.9	76.5
Upper	4	28.6	19.1	430	42.5	22.5	4	18.2	18.4	484	30.8	20.9	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	1,012	100.0	100.0	22	100.0	100.0	1,573	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	6.1	0	0.0	1.1	9.7
Middle	4	80.0	82.8	455	7.9	91.9	8	72.7	78.8	7,486	71.0	75.5	58.5
Upper	1	20.0	17.2	5,300	92.1	8.1	3	27.3	15.2	3,063	29.0	23.4	31.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	5,755	100.0	100.0	11	100.0	100.0	10,549	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	5.0	7.8	999	2.9	4.8	7	4.1	8.2	1,152	2.3	5.1	9.6
Middle	100	71.9	77.7	20,982	60.3	77.7	116	67.8	77.7	32,504	65.5	77.0	76.5
Upper	32	23.0	14.5	12,815	36.8	17.5	48	28.1	14.1	15,939	32.1	17.9	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	139	100.0	100.0	34,796	100.0	100.0	171	100.0	100.0	49,595	100.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data, 2011-2015 U.S. Census Bureau: American Community Survey</i>													

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	2.6	7.9	218	0.9	5.0	2	3.0	10.4	448	2.1	6.2	9.6
Middle	64	83.1	78.6	18,332	75.5	77.6	46	69.7	75.7	13,757	65.4	74.4	76.5
Upper	11	14.3	13.5	5,740	23.6	17.4	18	27.3	13.9	6,838	32.5	19.4	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	77	100.0	100.0	24,290	100.0	100.0	66	100.0	100.0	21,043	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	4.2	4.6	646	2.5	3.5	3	2.4	5.9	641	1.7	4.2	9.6
Middle	64	67.4	77.9	16,132	61.6	75.5	81	65.9	78.3	25,069	64.6	76.7	76.5
Upper	27	28.4	17.6	9,415	35.9	21.0	39	31.7	15.8	13,073	33.7	19.1	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	95	100.0	100.0	26,193	100.0	100.0	123	100.0	100.0	38,783	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.0	0	0.0	3.0	0	0.0	9.3	0	0.0	6.9	9.6
Middle	7	63.6	79.2	570	72.6	79.4	4	80.0	77.0	379	93.8	77.0	76.5
Upper	4	36.4	15.8	215	27.4	17.7	1	20.0	13.6	25	6.2	16.1	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	785	100.0	100.0	5	100.0	100.0	404	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.5	0	0.0	1.2	1	25.0	29.0	840	35.7	27.0	9.7
Middle	5	71.4	61.5	1,850	85.2	68.4	3	75.0	58.1	1,511	64.3	47.1	58.5
Upper	2	28.6	26.9	321	14.8	30.4	0	0.0	12.9	0	0.0	25.9	31.8
Unknown	0	0.0	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	2,171	100.0	100.0	4	100.0	100.0	2,351	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	3.2	6.3	864	1.6	4.2	6	3.0	8.1	1,929	3.1	6.2	9.6
Middle	140	73.7	78.0	36,884	69.0	76.0	134	67.7	77.1	40,716	65.1	74.4	76.5
Upper	44	23.2	15.7	15,691	29.4	19.8	58	29.3	14.8	19,936	31.9	19.5	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	190	100.0	100.0	53,439	100.0	100.0	198	100.0	100.0	62,581	100.0	100.0	100.0

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

Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 24020 (Glens Falls, NY) AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	5.6	6.0	163	4.0	4.5	2	7.1	6.3	244	3.7	4.2	4.4
Middle	10	55.6	74.2	2,332	57.7	74.5	19	67.9	72.3	4,741	71.5	73.2	73.7
Upper	7	38.9	19.8	1,549	38.3	21.0	7	25.0	21.3	1,642	24.8	22.6	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	18	100.0	100.0	4,044	100.0	100.0	28	100.0	100.0	6,627	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	6.0	0	0.0	4.3	2	25.0	5.7	208	15.3	3.0	4.4
Middle	5	83.3	66.3	1,475	90.8	69.4	3	37.5	70.2	510	37.6	73.3	73.7
Upper	1	16.7	27.7	150	9.2	26.3	3	37.5	24.0	640	47.1	23.7	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	1,625	100.0	100.0	8	100.0	100.0	1,358	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.2	0	0.0	1.6	0	0.0	5.3	0	0.0	3.1	4.4
Middle	0	0.0	77.1	0	0.0	77.6	1	50.0	66.7	15	23.1	65.0	73.7
Upper	1	100.0	21.7	40	100.0	20.8	1	50.0	28.1	50	76.9	31.9	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	40	100.0	100.0	2	100.0	100.0	65	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	66.7	46.2	395	1.6	13.4	2	50.0	50.0	1,890	57.3	27.7	25.0
Middle	1	33.3	46.2	24,740	98.4	68.3	2	50.0	50.0	1,406	42.7	72.3	64.5
Upper	0	0.0	7.7	0	0.0	18.3	0	0.0	0.0	0	0.0	0.0	10.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	25,135	100.0	100.0	4	100.0	100.0	3,296	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	10.7	5.9	558	1.8	5.6	6	14.3	6.1	2,342	20.6	4.8	4.4
Middle	16	57.1	72.2	28,547	92.6	73.3	25	59.5	71.1	6,672	58.8	73.0	73.7
Upper	9	32.1	21.9	1,739	5.6	21.2	11	26.2	22.7	2,332	20.6	22.2	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	28	100.0	100.0	30,844	100.0	100.0	42	100.0	100.0	11,346	100.0	100.0	100.0
Source: 2019 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding													

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 24020 (Glens Falls, NY) AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	6.7	5.6	94	2.6	3.9	0	0.0	9.0	0	0.0	5.7	4.4
Middle	12	80.0	73.3	3,292	90.2	72.1	16	88.9	72.7	2,984	86.7	75.1	73.7
Upper	2	13.3	21.1	263	7.2	24.0	2	11.1	18.3	456	13.3	19.2	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	15	100.0	100.0	3,649	100.0	100.0	18	100.0	100.0	3,440	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	5.0	3.2	101	2.3	1.8	3	12.5	3.5	889	13.5	2.4	4.4
Middle	15	75.0	69.3	3,427	78.3	68.9	18	75.0	68.9	5,068	76.7	70.0	73.7
Upper	4	20.0	27.5	851	19.4	29.2	3	12.5	27.6	647	9.8	27.6	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	20	100.0	100.0	4,379	100.0	100.0	24	100.0	100.0	6,604	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.5	0	0.0	3.9	0	0.0	0.8	0	0.0	0.6	4.4
Middle	1	100.0	75.6	34	100.0	79.3	2	100.0	67.8	35	100.0	70.2	73.7
Upper	0	0.0	20.9	0	0.0	16.8	0	0.0	31.4	0	0.0	29.2	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	34	100.0	100.0	2	100.0	100.0	35	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	17.6	0	0.0	2.3	3	60.0	37.5	611	56.5	11.1	25.0
Middle	1	100.0	76.5	259	100.0	95.7	2	40.0	58.3	470	43.5	87.4	64.5
Upper	0	0.0	5.9	0	0.0	2.0	0	0.0	4.2	0	0.0	1.5	10.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	259	100.0	100.0	5	100.0	100.0	1,081	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	5.4	4.4	195	2.3	2.8	6	12.2	6.1	1,500	13.4	4.5	4.4
Middle	29	78.4	71.5	7,012	84.3	73.4	38	77.6	70.2	8,557	76.7	73.7	73.7
Upper	6	16.2	24.2	1,114	13.4	23.8	5	10.2	23.7	1,103	9.9	21.8	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	37	100.0	100.0	8,321	100.0	100.0	49	100.0	100.0	11,160	100.0	100.0	100.0
Source: 2011-2015 U.S. Census Bureau: American Community Survey													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding													

Small Business Lending by Income Level of Geography

Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank			Agg		Bank		Agg		
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	4.7	5.7	681	2.8	5.0	7	5.6	5.9	613	3.9	3.1	8.2
Middle	101	58.7	66.3	15,919	65.9	60.9	67	53.2	68.7	9,393	59.5	66.9	67.8
Upper	63	36.6	28.0	7,539	31.2	34.1	52	41.3	25.4	5,793	36.7	30.0	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	172	100.0	100.0	24,139	100.0	100.0	126	100.0	100.0	15,799	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
The amounts reflected do not include small business loans categorized as "Other Lines/Loans"

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank			Agg		Bank		Agg		
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	18	2.4	6.6	1,671	2.6	5.1	17	3.3	6.5	606	1.2	5.7	7.8
Middle	381	51.4	66.2	35,344	55.1	62.8	259	50.7	67.6	23,380	46.4	63.7	67.5
Upper	342	46.2	27.2	27,142	42.3	32.1	235	46.0	25.9	26,400	52.4	30.6	24.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	741	100.0	100.0	64,157	100.0	100.0	511	100.0	100.0	50,386	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding
The amounts reflected do not include small business loans categorized as "Other Lines/Loans"

Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 24020 (Glens Falls, NY) AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	18.4	13.3	424	6.7	15.5	17	29.8	11.2	935	14.4	17.2	14.1
Middle	31	63.3	75.1	5,379	84.8	76.3	38	66.7	76.9	5,382	83.0	76.5	74.5
Upper	9	18.4	11.6	541	8.5	8.2	2	3.5	11.9	168	2.6	6.3	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	49	100.0	100.0	6,344	100.0	100.0	57	100.0	100.0	6,485	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding
The amounts reflected do not include small business loans categorized as "Other Lines/Loans"

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 24020 (Warren County, NY) AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	34	22.4	14.4	3,915	24.1	21.1	28	19.7	12.5	3,318	19.4	17.1	14.0
Middle	109	71.7	74.6	11,938	73.4	73.5	96	67.6	74.8	13,312	77.8	76.9	74.5
Upper	9	5.9	11.0	415	2.6	5.4	18	12.7	12.7	484	2.8	5.9	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	152	100.0	100.0	16,268	100.0	100.0	142	100.0	100.0	17,114	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding
The amounts reflected do not include small business loans categorized as "Other Lines/Loans"

Home Mortgage Lending by Borrower Income Level

Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	7	8.8	5.6	1,103	5.5	2.9	3	4.4	6.2	392	2.0	3.0	17.4
Moderate	5	6.3	21.0	830	4.1	14.7	7	10.3	22.0	1,165	5.8	16.2	19.0
Middle	12	15.0	25.5	2,611	13.1	22.3	14	20.6	24.7	3,259	16.2	22.9	22.2
Upper	41	51.3	40.6	12,041	60.2	53.2	37	54.4	35.9	12,884	64.2	47.2	41.4
Unknown	15	18.8	7.2	3,417	17.1	6.9	7	10.3	11.2	2,378	11.8	10.8	0.0
Total	80	100.0	100.0	20,002	100.0	100.0	68	100.0	100.0	20,078	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.3	0	0.0	4.8	7	10.0	7.0	953	5.5	3.9	17.4
Moderate	5	12.5	20.9	699	8.7	16.9	7	10.0	17.5	1,111	6.4	12.5	19.0
Middle	8	20.0	28.2	1,193	14.9	28.0	15	21.4	26.5	2,405	13.8	22.7	22.2
Upper	21	52.5	36.7	5,356	66.7	42.6	35	50.0	39.1	10,887	62.6	49.5	41.4
Unknown	6	15.0	5.9	779	9.7	7.7	6	8.6	9.8	2,039	11.7	11.4	0.0
Total	40	100.0	100.0	8,027	100.0	100.0	70	100.0	100.0	17,395	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.0	0	0.0	4.6	2	9.1	6.7	215	13.7	5.1	17.4
Moderate	3	21.4	16.7	95	9.4	12.9	8	36.4	14.9	217	13.8	11.0	19.0
Middle	2	14.3	26.3	120	11.9	20.6	6	27.3	27.3	121	7.7	20.9	22.2
Upper	6	42.9	48.8	570	56.3	58.3	4	18.2	49.4	550	35.0	59.8	41.4
Unknown	3	21.4	2.1	227	22.4	3.7	2	9.1	1.8	470	29.9	3.0	0.0
Total	14	100.0	100.0	1,012	100.0	100.0	22	100.0	100.0	1,573	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	5.2	6.3	1,103	3.8	3.4	12	7.5	6.4	1,560	4.0	3.3	17.4
Moderate	13	9.7	20.1	1,624	5.6	15.0	22	13.8	19.5	2,493	6.4	14.7	19.0
Middle	22	16.4	25.7	3,924	13.5	23.1	35	21.9	25.1	5,785	14.8	22.5	22.2
Upper	68	50.7	40.3	17,967	61.9	50.2	76	47.5	38.2	24,321	62.3	48.1	41.4
Unknown	24	17.9	7.7	4,423	15.2	8.3	15	9.4	10.8	4,887	12.5	11.5	0.0
Total	134	100.0	100.0	29,041	100.0	100.0	160	100.0	100.0	39,046	100.0	100.0	100.0
Source: 2019 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding													
Multifamily loans are not included in the borrower distribution analysis													

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	8	10.4	9.0	1,573	6.5	4.9	8	12.1	7.4	1,662	7.9	3.7	17.4
Moderate	13	16.9	25.5	2,965	12.2	19.8	15	22.7	22.9	3,980	18.9	16.7	19.0
Middle	17	22.1	24.1	4,739	19.5	23.1	6	9.1	23.1	1,810	8.6	21.4	22.2
Upper	34	44.2	31.7	13,645	56.2	43.6	31	47.0	36.0	12,283	58.4	48.5	41.4
Unknown	5	6.5	9.6	1,368	5.6	8.6	6	9.1	10.6	1,308	6.2	9.7	0.0
Total	77	100.0	100.0	24,290	100.0	100.0	66	100.0	100.0	21,043	100.0	100.0	100.0
Refinance Loans													
Low	8	8.4	5.8	1,781	6.8	3.3	6	4.9	6.3	787	2.0	3.5	17.4
Moderate	13	13.7	19.0	2,218	8.5	14.2	19	15.4	18.6	3,951	10.2	13.4	19.0
Middle	14	14.7	26.0	3,586	13.7	23.6	26	21.1	25.7	6,090	15.7	22.9	22.2
Upper	49	51.6	40.5	16,594	63.4	49.6	61	49.6	40.3	22,664	58.4	50.1	41.4
Unknown	11	11.6	8.8	2,014	7.7	9.4	11	8.9	9.2	5,291	13.6	10.0	0.0
Total	95	100.0	100.0	26,193	100.0	100.0	123	100.0	100.0	38,783	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.0	0	0.0	3.2	2	40.0	4.5	272	67.3	3.3	17.4
Moderate	0	0.0	17.2	0	0.0	11.2	0	0.0	15.1	0	0.0	13.5	19.0
Middle	1	9.1	28.8	20	2.5	26.2	2	40.0	28.0	102	25.2	20.7	22.2
Upper	5	45.5	46.8	280	35.7	55.8	1	20.0	50.5	30	7.4	59.3	41.4
Unknown	5	45.5	2.2	485	61.8	3.6	0	0.0	1.9	0	0.0	3.2	0.0
Total	11	100.0	100.0	785	100.0	100.0	5	100.0	100.0	404	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	16	8.7	6.9	3,354	6.5	4.0	16	8.2	6.6	2,721	4.5	3.6	17.4
Moderate	26	14.2	20.7	5,183	10.1	16.3	34	17.5	19.8	7,931	13.2	14.9	19.0
Middle	32	17.5	24.3	8,345	16.3	22.8	34	17.5	24.5	8,002	13.3	21.9	22.2
Upper	88	48.1	36.5	30,519	59.5	46.2	93	47.9	39.2	34,977	58.1	49.4	41.4
Unknown	21	11.5	11.5	3,867	7.5	10.7	17	8.8	9.9	6,599	11.0	10.2	0.0
Total	183	100.0	100.0	51,268	100.0	100.0	194	100.0	100.0	60,230	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding													
Multifamily loans are not included in the borrower distribution analysis													

Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 24020 (Glens Falls, NY) AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	6.9	0	0.0	3.6	1	3.6	3.6	113	1.7	1.9	18.6
Moderate	1	5.6	19.8	163	4.0	13.6	2	7.1	17.9	351	5.3	12.2	13.9
Middle	4	22.2	28.7	770	19.0	25.1	6	21.4	26.9	973	14.7	22.4	22.9
Upper	13	72.2	39.1	3,111	76.9	52.4	17	60.7	41.2	4,266	64.4	53.0	44.7
Unknown	0	0.0	5.4	0	0.0	5.3	2	7.1	10.4	924	13.9	10.5	0.0
Total	18	100.0	100.0	4,044	100.0	100.0	28	100.0	100.0	6,627	100.0	100.0	100.0
Refinance Loans													
Low	1	16.7	10.0	122	7.5	6.3	0	0.0	4.0	0	0.0	2.2	18.6
Moderate	1	16.7	17.2	150	9.2	12.6	1	12.5	17.4	90	6.6	12.0	13.9
Middle	1	16.7	21.0	220	13.5	20.5	3	37.5	24.0	559	41.2	17.7	22.9
Upper	3	50.0	47.0	1,133	69.7	55.7	4	50.0	47.9	709	52.2	61.2	44.7
Unknown	0	0.0	4.8	0	0.0	4.9	0	0.0	6.7	0	0.0	6.8	0.0
Total	6	100.0	100.0	1,625	100.0	100.0	8	100.0	100.0	1,358	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	12.0	0	0.0	8.7	0	0.0	9.6	0	0.0	7.4	18.6
Moderate	0	0.0	12.0	0	0.0	14.3	0	0.0	12.3	0	0.0	7.7	13.9
Middle	1	100.0	32.5	40	100.0	25.5	0	0.0	19.3	0	0.0	13.3	22.9
Upper	0	0.0	41.0	0	0.0	47.3	2	100.0	56.1	65	100.0	65.9	44.7
Unknown	0	0.0	2.4	0	0.0	4.2	0	0.0	2.6	0	0.0	5.7	0.0
Total	1	100.0	100.0	40	100.0	100.0	2	100.0	100.0	65	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	4.0	7.9	122	2.1	4.2	1	2.6	4.1	113	1.4	2.1	18.6
Moderate	2	8.0	18.1	313	5.5	13.0	3	7.9	16.8	441	5.5	11.7	13.9
Middle	6	24.0	26.3	1,030	18.0	23.3	9	23.7	24.6	1,532	19.0	20.2	22.9
Upper	16	64.0	40.8	4,244	74.3	53.0	23	60.5	44.2	5,040	62.6	55.4	44.7
Unknown	0	0.0	6.8	0	0.0	6.5	2	5.3	10.3	924	11.5	10.6	0.0
Total	25	100.0	100.0	5,709	100.0	100.0	38	100.0	100.0	8,050	100.0	100.0	100.0
Source: 2019 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding													
Multifamily loans are not included in the borrower distribution analysis													

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 24020 (Glens Falls, NY) AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	6.1	0	0.0	3.2	2	11.1	6.2	350	10.2	3.2	18.6
Moderate	2	13.3	18.4	346	9.5	13.7	0	0.0	21.9	0	0.0	15.5	13.9
Middle	4	26.7	25.1	581	15.9	22.7	5	27.8	24.1	1,107	32.2	20.7	22.9
Upper	6	40.0	36.5	1,838	50.4	48.4	6	33.3	36.4	1,035	30.1	50.5	44.7
Unknown	3	20.0	14.0	884	24.2	12.1	5	27.8	11.5	948	27.6	10.1	0.0
Total	15	100.0	100.0	3,649	100.0	100.0	18	100.0	100.0	3,440	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.9	0	0.0	2.3	1	4.2	4.8	129	2.0	2.7	18.6
Moderate	1	5.0	12.1	192	4.4	8.0	2	8.3	15.9	512	7.8	10.8	13.9
Middle	3	15.0	22.9	440	10.0	17.9	2	8.3	24.4	538	8.1	20.1	22.9
Upper	14	70.0	50.7	3,422	78.1	60.9	14	58.3	46.3	4,098	62.1	56.7	44.7
Unknown	2	10.0	10.4	325	7.4	10.9	5	20.8	8.6	1,327	20.1	9.7	0.0
Total	20	100.0	100.0	4,379	100.0	100.0	24	100.0	100.0	6,604	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	8.1	0	0.0	5.8	0	0.0	4.2	0	0.0	4.0	18.6
Moderate	0	0.0	9.3	0	0.0	9.7	0	0.0	16.9	0	0.0	15.9	13.9
Middle	0	0.0	22.1	0	0.0	17.1	1	50.0	27.1	15	42.9	21.3	22.9
Upper	1	100.0	59.3	34	100.0	61.7	0	0.0	49.2	0	0.0	56.9	44.7
Unknown	0	0.0	1.2	0	0.0	5.7	1	50.0	2.5	20	57.1	1.9	0.0
Total	1	100.0	100.0	34	100.0	100.0	2	100.0	100.0	35	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	4.9	0	0.0	2.8	3	6.8	5.3	479	4.8	3.0	18.6
Moderate	3	8.3	14.6	538	6.7	10.6	2	4.5	18.5	512	5.1	13.4	13.9
Middle	7	19.4	22.8	1,021	12.7	19.5	8	18.2	24.0	1,660	16.5	20.2	22.9
Upper	21	58.3	42.6	5,294	65.7	53.1	20	45.5	42.1	5,133	50.9	53.5	44.7
Unknown	5	13.9	15.0	1,209	15.0	14.0	11	25.0	10.1	2,295	22.8	10.0	0.0
Total	36	100.0	100.0	8,062	100.0	100.0	44	100.0	100.0	10,079	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding													
Multifamily loans are not included in the borrower distribution analysis													

Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	95	55.2	43.9	12,182	50.5	28.1	64	50.8	41.9	9,051	57.3	30.4	92.0
Over \$1 Million	44	25.6		8,418	34.9		41	32.5		4,142	26.2		6.7
Revenue Unknown	33	19.2		3,539	14.7		21	16.7		2,606	16.5		1.3
Total	172	100.0		24,139	100.0		126	100.0		15,799	100.0		100.0
By Loan Size													
\$100,000 or Less	120	69.8	93.7	4,380	18.1	35.4	88	69.8	94.7	3,161	20.0	36.7	
\$100,001 - \$250,000	22	12.8	3.4	3,801	15.7	16.7	21	16.7	2.5	3,706	23.5	13.4	
\$250,001 - \$1 Million	30	17.4	2.9	15,958	66.1	47.9	17	13.5	2.8	8,932	56.5	49.9	
Total	172	100.0	100.0	24,139	100.0	100.0	126	100.0	100.0	15,799	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	69	72.6		2,201	18.1		48	75.0		1,713	18.9		
\$100,001 - \$250,000	11	11.6		1,933	15.9		5	7.8		940	10.4		
\$250,001 - \$1 Million	15	15.8		8,048	66.1		11	17.2		6,398	70.7		
Total	95	100.0		12,182	100.0		64	100.0		9,051	100.0		
<p>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding The amounts reflected do not include small business loans categorized as "Other Lines/Loans"</p>													

Small Business Lending by Revenue Size of Businesses

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	97	13.1	32.3	7,309	11.4	21.7	76	14.9	43.3	4,750	9.4	30.3	92.2
Over \$1 Million	125	16.9		23,284	36.3		101	19.8		25,395	50.4		6.4
Revenue Unknown	519	70.0		33,564	52.3		334	65.4		20,241	40.2		1.4
Total	741	100.0		64,157	100.0		511	100.0		50,386	100.0		100.0
By Loan Size													
\$100,000 or Less	572	77.2	89.4	18,048	28.1	35.0	376	73.6	93.5	11,124	22.1	41.9	
\$100,001 - \$250,000	107	14.4	6.6	16,805	26.2	22.5	75	14.7	4.0	11,707	23.2	19.0	
\$250,001 - \$1 Million	62	8.4	3.9	29,304	45.7	42.6	60	11.7	2.5	27,555	54.7	39.1	
Total	741	100.0	100.0	64,157	100.0	100.0	511	100.0	100.0	50,386	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	85	87.6		2,682	36.7		66	86.8		2,340	49.3		
\$100,001 - \$250,000	5	5.2		703	9.6		6	7.9		1,018	21.4		
\$250,001 - \$1 Million	7	7.2		3,924	53.7		4	5.3		1,392	29.3		
Total	97	100.0		7,309	100.0		76	100.0		4,750	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding The amounts reflected do not include small business loans categorized as "Other Lines/Loans"													

Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 24020 (Glens Falls, NY) AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	24	49.0	43.3	3,454	54.4	30.4	34	59.6	40.8	4,293	66.2	28.0	90.9
Over \$1 Million	17	34.7		1,785	28.1		20	35.1		1,572	24.2		8.1
Revenue Unknown	8	16.3		1,105	17.4		3	5.3		620	9.6		1.0
Total	49	100.0		6,344	100.0		57	100.0		6,485	100.0		100.0
By Loan Size													
\$100,000 or Less	32	65.3	91.8	1,465	23.1	38.2	39	68.4	92.8	1,723	26.6	34.2	
\$100,001 - \$250,000	8	16.3	5.1	1,179	18.6	25.5	11	19.3	4.1	1,898	29.3	18.6	
\$250,001 - \$1 Million	9	18.4	3.1	3,700	58.3	36.3	7	12.3	3.2	2,864	44.2	47.2	
Total	49	100.0	100.0	6,344	100.0	100.0	57	100.0	100.0	6,485	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	15	62.5		676	19.6		21	61.8		1,082	25.2		
\$100,001 - \$250,000	4	16.7		645	18.7		8	23.5		1,389	32.4		
\$250,001 - \$1 Million	5	20.8		2,133	61.8		5	14.7		1,822	42.4		
Total	24	100.0		3,454	100.0		34	100.0		4,293	100.0		
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding The amounts reflected do not include small business loans categorized as "Other Lines/Loans"													

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 24020 (Glens Falls, NY) AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	39	25.7	28.6	3,477	21.4	19.3	40	28.2	37.9	5,240	30.6	22.2	91.1
Over \$1 Million	36	23.7		6,359	39.1		33	23.2		7,742	45.2		7.9
Revenue Unknown	77	50.7		6,432	39.5		69	48.6		4,132	24.1		1.0
Total	152	100.0		16,268	100.0		142	100.0		17,114	100.0		100.0
By Loan Size													
\$100,000 or Less	102	67.1	86.8	3,996	24.6	35.3	95	66.9	89.3	3,120	18.2	34.2	
\$100,001 - \$250,000	33	21.7	8.4	4,898	30.1	24.5	29	20.4	6.8	4,896	28.6	23.8	
\$250,001 - \$1 Million	17	11.2	4.8	7,374	45.3	40.2	18	12.7	3.9	9,098	53.2	42.1	
Total	152	100.0	100.0	16,268	100.0	100.0	142	100.0	100.0	17,114	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	27	69.2		1,114	32.0		25	62.5		1,036	19.8		
\$100,001 - \$250,000	10	25.6		1,599	46.0		9	22.5		1,401	26.7		
\$250,001 - \$1 Million	2	5.1		764	22.0		6	15.0		2,803	53.5		
Total	39	100.0		3,477	100.0		40	100.0		5,240	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding. The amounts reflected do not include small business loans categorized as "Other Lines/Loans"													

CRA APPENDIX C GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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