

PUBLIC DISCLOSURE

June 26, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Solvay Bank
RSSD No. 722816

1537 Milton Avenue
Solvay, NY 13209

Federal Reserve Bank of New York

33 Liberty Street
New York, NY 10045

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

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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the satisfactory performance rating for Solvay Bank (“Solvay” 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 area credit needs.
- A substantial majority of loans and other lending-related activities were made in the bank's assessment area.
- The geographic distribution of loans reflected reasonable dispersion throughout the assessment area; and
- The distribution of borrowers reflected, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank’s community development performance demonstrated adequate responsiveness to community development needs of its assessment area, through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

SCOPE OF EXAMINATION

Procedures

Solvay’s CRA performance was evaluated using the Federal Financial Institutions Examination Council's (“FFIEC”) Interagency Intermediate Small Institution Examination Procedures. These procedures include two tests: the Lending Test and the Community Development Test. Banks must achieve at least a “Satisfactory” rating under each test to obtain an overall “Satisfactory” rating. 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.

Examiners reviewed the bank’s small business loans and home mortgage loans from January 1, 2017, to December 31, 2022. The evaluation period for Solvay’s community development test included qualified activities from April 1, 2017, through December 31, 2022.

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

Products

During this evaluation, loans reportable under the Home Mortgage Disclosure Act (“HMDA”), and small business loans, were analyzed, as these loan types represented the major product lines based on a review of bank records, business strategy, and loan portfolio composition. HMDA reportable loans included home purchase, home refinance, and home improvement loans. The small business loans included commercial real estate or commercial and industrial loans and lines of credit in amounts of \$1 million or less. The bank is not a CRA small business loan reporter, however, the bank optionally collected small business data. Multifamily, construction, consumer, and small farm loans were excluded from the evaluation as the volume was too low for a meaningful analysis. Home purchase and small business loans carried more weigh to the overall conclusion due to the larger loan volume. Examiners verified the integrity of HMDA and the bank’s small business data from January 1, 2017, through December 31, 2022.

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

Lending Distribution Analysis

The analyses of borrower and geographic distribution were based on loans made in Solvay’s assessment area. To evaluate the geographic distribution, the proportion of home purchase, home refinance, and home improvement loan originations in low- and moderate-income (“LMI”) geographies were compared with the proportion of owner-occupied housing units in LMI geographies. For small business loans, the analysis compared the proportion of loan originations in LMI geographies with the proportion of small businesses located in LMI geographies as reported, based on Dun and Bradstreet ("D&B") data. The geographic distribution performance in low- and moderate-income geographies were analyzed separately.

To analyze the borrower characteristics of home purchase, home refinance, and home improvement loans, the proportion of originations to LMI borrowers was compared with the proportion of LMI families in the assessment area. Median family income (“MFI”) estimates from the FFIEC were used to categorize borrower income. For small business lending, the analysis compared the proportion of loans to businesses with gross annual revenues (“GAR”) of \$1 million or less, based on D&B data, to the proportion of all such businesses located in the assessment area. 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.

Solvay’s HMDA lending performance was also compared to the respective year’s performance of the aggregate of all lenders in the assessment area subject to HMDA reporting. Peer data was used for the loan-to-deposit analysis. Local peer banks were selected based on the volume of deposits and number of branches in order to choose banks similarly sized to Solvay within the assessment area. Solvay’s performance in making community development loans and qualified investments was also compared with peer banks in Solvay’s assessment area.

DESCRIPTION OF INSTITUTION

Solvay Bank, headquartered in Solvay, NY, is the sole bank subsidiary of Solvay Bank Corporation, a bank holding company. Solvay operates nine retail branches located throughout Onondaga County. Solvay is a full-service commercial bank that offers a variety of consumer and commercial loan products, deposit products, and trust services. Solvay offers personal and commercial savings, checking, money market and certificates of deposit, individual retirement accounts and health savings accounts. Loan products offered include commercial and residential mortgages, home improvement loans, home equity loans and lines of credit, small business loans, automobile loans and personal loans.

Solvay operates in a competitive market with branches of numerous local, regional, and national banks operating in the bank’s assessment area. According to the June 30, 2022, Federal Deposit Insurance Corporation (“FDIC”) Deposit Market Share Report, 15 financial institutions operate 103 branches in the MSA 45060 (Syracuse, NY) assessment area. Of these institutions, Solvay ranked 5th with a deposit market share of 7.9%.

Based on the December 31, 2022, FFIEC Consolidated Report of Condition and Income ("Call Report"), Solvay had total assets of \$1.1 billion, total loans and leases of \$672.0 million, and total domestic deposits of \$992.6 million. Solvay’s loan portfolio by dollar volume consisted of a mix of residential real estate and commercial loans as summarized in the following table:

Loan Type	\$(000s)	Percent of Total Loans & Leases
1-4 Residential Real Estate Secured	291,497	43.4
Multifamily Dwelling	16,972	2.5
Construction	27,276	4.1
HELOCs	29,349	4.4
Consumer	77,719	11.6
Commercial & Industrial	77,652	11.6
Nonfarm Nonresidential Secured	147,284	21.9
Other	4,252	0.5
Total	672,001	100.0

Source: FFIEC Consolidated Report of Condition and Income December 31, 2022

Based on the December 31, 2022, Uniform Bank Performance Report ("UBPR"), Solvay's deposit portfolio by dollar volume was primarily comprised of demand deposits, money market deposit accounts, and time deposits as summarized in the following table:

Deposit Type	\$(000s)	Percent of Total Deposits
Demand Deposits	319,855	32.2
Now & ATS Accounts	122,128	12.3
Money Market Deposit Accounts	232,804	23.5
Other Savings Deposits	153,325	15.4
Time Deposits at or below Insurance Limit	92,334	9.3
Time Deposits above Insurance Limit	72,124	7.3
Total	992,570	100.0

Source: Uniform Bank Performance Report as of December 31, 2022

Previous Public Evaluation

Solvay's previous CRA evaluation was conducted as of June 12, 2017, using the FFIEC Interagency Intermediate Small Institution Examination Procedures. The prior evaluation resulted in an overall rating of Satisfactory. There were no financial or legal factors to prevent Solvay from fulfilling its responsibility under CRA.

DESCRIPTION OF ASSESSMENT AREA

Solvay has one assessment area, which consists of Onondaga County, New York. The assessment area is part of MSA 45060 (Syracuse, NY). The assessment area delineation remained unchanged since the previous evaluation. From 2017 to 2021, according to the 2015 U.S. Census Bureau American Community Survey (ACS), the assessment area consisted of 140 census tracts, of which 23 were low-, 20 were moderate-, 50 were middle-, 42 were upper-income census tracts, and 5 did not have an income designation. In 2022, due to the 2020 U.S. Census data changes, the assessment area contained 142 census tracts, of which 18 were low-, 21 were moderate-, 54 were middle-, 42 were upper-income, and 7 were designated as unknown-income census tracts. See Appendix B for a map illustrating Solvay's assessment area.

Community Contact

A community representative from an economic development organization in the assessment area was contacted to provide information regarding local economic and demographic conditions. The community contact provided information on affordable housing, community services, and economic development needs within the assessment area. The contact stressed the need for more funding for new and struggling small businesses. The contact noted that rising interest rates have increased the difficulty for small businesses to acquire financing and that the area would benefit from more flexible financing products from financial institutions. The contact further noted that the supply of affordable housing stock is significantly lower than the demand. The community contact described the primary barrier to affordable housing in the region to be a lack of tools and products to support these projects. The contact stated that while Low Income Housing Tax Credits are beneficial and create affordable housing, the area’s low-income communities would benefit from programs that support mixed-income housing to help elevate the area and provide financial mobility to low-income families.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe this assessment area and to evaluate the context in which Solvay operated. The information was obtained from publicly available sources, including the 2015 ACS, 2020 U.S. Census, U.S. Department of Labor (DOL), D&B, FFIEC, and U.S. Department of Housing and Urban Development (HUD).

2017-2021

The relevant performance context data for the assessment area for period 2017 to 2021 was derived from the 2015 ACS.

Demographic Characteristics

The MSA 45060 (Syracuse, NY) assessment area included Onondaga County. According to the 2015 ACS data, the population of this assessment area was 468,304. The assessment area consisted of 140 census tracts, of which 23 or 16.4% were low-income, 20 or 14.3% were moderate-income, 50 or 35.7% were middle-income, 42 or 30.0% were upper-income, and 5 or 3.6% were of unknown-income.

Income Characteristics

Based on the 2015 ACS data, the MSA 45060 (Syracuse, NY) assessment area had 112,623 families, of which 20.9% were low-income (10.5% of which were below the poverty level), 16.2% were moderate-income, 19.1% were middle-income, and 43.1% were upper income. The FFIEC median family incomes for the counties comprising the MSA as of the 2015 ACS were as follows:

MSA 45060 (Syracuse, NY) - Median Family Income Change			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Assessment Area	\$78,168	\$82,368	5.37%
MSA 45060 (Syracuse, NY)	\$74,807	\$79,766	6.63%
New York State	\$78,570	\$87,270	11.07%

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

Housing Characteristics

Based on the 2015 ACS data, the MSA 45060 (Syracuse, NY) assessment area had 203,956 housing units, of which 59.1% were owner-occupied, 31.4% were rental, and 9.5% were vacant. Of the total housing units, 12.7% were located in low-income census tracts, 13.6% in moderate-income census tracts, 33.9% in middle-income census tracts, 33.5% in upper-income census tracts, and 1.3% in unknown-income census tracts. In low-income census tracts, 17.5% of housing units were owner-occupied, 61.3% were rental units, and 21.2% were vacant. In moderate-income census tracts, 38.0% of housing units were owner-occupied, 50.5% were rental units, and 11.5% were vacant.

The median age of housing stock in this assessment area was 60 years old, with 31.3% of the stock built before 1950. The median age of housing stock was 61 years in low-income tracts and 61 years in moderate-income tracts. According to the 2015 ACS, the median housing value in this assessment area was \$135,854 with an affordability ratio of 40.5. The median gross rent in the assessment area was \$787 per month.

Housing Characteristics			
Geographic Area	2015 Median Housing Value	2015 Affordability Ratio	2015 Median Gross Rent
Assessment Area	\$135,854	40.5	\$787
MSA45060 (Syracuse, NY)	\$126,656	42.3	\$770
New York State	\$283,400	20.9	\$1,132

Housing Cost Burden

Throughout the review period, housing costs were relatively expensive in the assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 42.3% of all rental households had rental costs that exceeded 30% of their incomes, 73.6% of low-income rental households had rental costs that exceeded 30% of their income, and 24.4% of moderate-income rental households had rental costs that exceeded 30% of their income. According to HUD's data, within this assessment area, 16.3% of homeowners had housing costs that exceeded 30% of their incomes, 61.4% of low-income homeowners had housing costs that exceeded 30% of their income, and 27.2% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

MSA 45060 (Syracuse, NY) – 2017-2021 Housing Cost Burden*						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	73.6%	24.4%	42.3%	61.4%	27.2%	16.3%
MSA 45060 (Syracuse, NY)	72.6%	22.8%	42.2%	61.6%	26.2%	16.8%
New York State	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

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

Labor, Employment and Economic Characteristics

In 2017, there were 18,350 businesses operating in the assessment area of which 10.4% were located in low-income census tracts and 9.6% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.8% were small businesses with GAR of \$1 million or less, of which 10.0% were located in low-income census tracts and 9.6% were located in moderate-income census tracts.

In 2018, there were 20,131 businesses operating in the assessment area in 2018, of which 10.1% were located in low-income census tracts and 9.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.4% were small businesses with a GAR of \$1 million or less, of which 9.6% were located in low-income census tracts and 9.7% were located in moderate-income census tracts.

In 2019, there were 19,736 businesses operating in the assessment area, of which 10.2% were located in low-income census tracts and 9.7% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.6% were small businesses with a GAR of \$1 million or less, of which 9.7% were located in low-income census tracts and 9.6% were located in moderate-income census tracts.

In 2020, there were 19,412 businesses operating in this assessment area, of which 10.1% were located in low-income census tracts and 9.5% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.8% were small businesses with a GAR of \$1 million or less, of which 9.6% were located in low-income census tracts and 9.4% were located in moderate-income census tracts.

In 2021, there were 18,826 businesses operating in the assessment area, of which 10.2% were located in low-income census tracts and 9.5% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.9% were small businesses with a GAR of \$1 million or less, of which 9.7% were located in low-income census tracts and 9.4% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.6% in 2017, decreased to 4.0% in 2018, decreased to 3.8% in 2019, increased to 8.0% in 2020, and decreased to 4.9% in 2021. The state of New York had an unemployment rate of 4.6% in 2017, decreased to 4.1% in 2018, decreased to 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021.

MSA 45060 (Syracuse, NY) – 2017-2021 Unemployment Rates					
Area	2017	2018	2019	2020	2021
MSA 45060 (Syracuse, NY) - 2017	4.6%	4.0%	3.8%	8.0%	4.9%
Syracuse, NY MSA	5.0%	4.3%	4.1%	8.1%	5.0%
New York	4.6%	4.1%	3.8%	9.9%	6.9%

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

Additional performance context data for this assessment area is provided in the following table:

MSA 45060 (Syracuse, NY)								
Assessment Area Demographics Table 2017-2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	23	16.4	11,100	9.9	4,628	41.7	23,519	20.9
Moderate-income	20	14.3	11,692	10.4	2,290	19.6	18,193	16.2
Middle-income	50	35.7	45,469	40.4	2,952	6.5	22,377	19.9
Upper-income	42	30.0	43,880	39.0	1,823	4.2	48,534	43.1
Unknown-income	5	3.6	482	0.4	178	36.9	0	0.0
Total Assessment Area	140	100.0	112,623	100.0	11,871	10.5	112,623	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,960	4,549	3.8	17.5	15,910	61.3	5,501	21.2
Moderate-income	27,704	10,515	8.7	38.0	14,002	50.5	3,187	11.5
Middle-income	79,317	53,949	44.8	68.0	19,738	24.9	5,630	7.1
Upper-income	68,287	51,307	42.6	75.1	12,200	17.9	4,780	7.0
Unknown-income	2,688	209	0.2	7.8	2,262	84.2	217	8.1
Total Assessment Area	203,956	120,529	100.0	59.1	64,112	31.4	19,315	9.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1,917	10.2	1,625	9.7	273	14.4	19	9.7
Moderate-income	1,785	9.5	1,577	9.4	194	10.2	14	7.1
Middle-income	7,507	39.9	6,579	39.3	847	44.5	81	41.3
Upper-income	7,132	37.9	6,562	39.2	491	25.8	79	40.3
Unknown-income	485	2.6	385	2.3	97	5.1	3	1.5

Total Assessment Area	18,826	100.0	16,728	100.0	1,902	100.0	196	100.0
	Percentage of Total Businesses:			88.9		10.1		1.0
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	4	1.6	2	0.8	0	0.0	2	100.0
Moderate-income	1	0.4	1	0.4	0	0.0	0	0.0
Middle-income	99	39.6	95	40.1	4	36.4	0	0.0
Upper-income	143	57.2	137	57.8	6	54.5	0	0.0
Unknown-income	3	1.2	2	0.8	1	9.1	0	0.0
Total Assessment Area	250	100.0	237	100.0	11	100.0	2	100.0
	Percentage of Total Farms:			94.8		4.4		.8
<i>2021 FFIEC Census Data and 2021 Dun and Bradstreet Information</i>								

2022

The relevant performance context data for the assessment area for period for 2022 was derived from the 2020 US Census data.

Demographic Characteristics

The MSA 45060 (Syracuse, NY) assessment area included Onondaga County. According to the 2020 U.S. Census, the population of this assessment area was 476,516. The assessment area consisted of 142 census tracts, of which 18 or 12.7% were low-income, 21 or 14.8% were moderate-income, 54 or 38.0% were middle-income, 42 or 29.6% were upper-income, and 7 or 4.9% were of unknown-income.

Income Characteristics

Based on the 2020 U.S. Census, the MSA 45060 (Syracuse, NY) assessment area had 113,106 families, of which 21.5% were low-income (9.9% of which were below the poverty level), 16.5% were moderate-income, 20.0% were middle-income, and 42.0% were upper income. The FFIEC median family incomes for the counties comprising the MSA as of the 2020 U.S. Census were as follows:

MSA 45060 (Syracuse, NY) - Median Family Income Change			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Assessment Area	\$78,168	\$82,368	5.37%
MSA 45060 (Syracuse, NY)	\$74,807	\$79,766	6.63%
New York State	\$78,570	\$87,270	11.07%

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

Housing Characteristics

Based on the 2020 U.S. Census Data, the MSA 45060 (Syracuse, NY) assessment area had 209,068 housing units, of which 58.3% were owner-occupied, 31.3% were rental, and 10.4% were vacant. Of the total owner-occupied housing units, 3.1% were located in low-income census tracts, 10.7% in moderate-income census tracts, 43.7% in middle-income census tracts, 41.9% in upper-income census tracts, and 0.6% in unknown-income census tracts. In low-income census tracts, 17.2% of housing units were owner-occupied, 62.3% were rental units, and 20.5% were vacant. In moderate-income census tracts, 41.6% of housing units were owner-occupied, 45.9% were rental units, and 12.5% were vacant.

The median age of housing stock in this assessment area was 61 years old, with 30.3% of the stock built before 1950. The median age of housing stock was 61 years in low-income tracts and 61 years in moderate-income tracts. According to the 2020 U.S. Census, the median housing value in this assessment area was \$148,074 with an affordability ratio of 42.2. The median gross rent in the assessment area was \$888 per month.

Housing Characteristics			
Geographic Area	2020 Median Housing Value	2020 Affordability Ratio	2020 Median Gross Rent
Assessment Area	\$148,074	42.2	\$888
MSA 45060 (Syracuse, NY)	\$140,902	43.9	\$868
New York State	\$325,000	21.9	\$1,315

Housing Cost Burden

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for low-income individuals and families continued to be a challenge. According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area,

42.3% of all rental households had rental costs that exceeded 30% of their incomes, 73.6% of low-income rental households had rental costs that exceeded 30% of their income, and 24.4% of moderate-income rental households had rental costs that exceeded 30% of their income. According to HUD's data, within this assessment area, 16.3% of homeowners had housing costs that exceeded 30% of their incomes, 61.4% of low-income homeowners had housing costs that exceeded 30% of their income, and 27.2% of moderate-income homeowners had housing costs that exceeded 30% of their income. See the "Housing Cost Burden" table below for more details.

MSA 45060 (Syracuse, NY) - Housing Cost Burden*						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	73.6%	24.4%	42.3%	61.4%	27.2%	16.3%

MSA 45060 (Syracuse, NY)	72.6%	22.8%	42.2%	61.6%	26.2%	16.8%
New York State	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

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

Labor, Employment and Economic Characteristics

According to D&B data, there were 18,739 businesses operating in this assessment area in 2022, of which 8.6% were located in low-income census tracts and 11.4% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 88.9% were small businesses with a Gross Annual Revenue ("GAR") of \$1 million or less, of which 8.0% were located in low-income census tracts and 11.4% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment rates at the MSA and state levels declined during the evaluation period. Unemployment levels increased significantly in 2020 due to the economic impact of the COVID-19 pandemic that began in March 2020. During the evaluation period, the assessment area unemployment levels were comparable to, or below MSA and state levels. In 2022, the unemployment rate in the assessment area decreased to the lowest levels during the review period at 3.5%, which was below both the MSA and the state levels. The following table presents annual and current unemployment rates for the assessment area and the state since 2017.

MSA 45060 (Syracuse, NY) - Unemployment Rates						
Area	2017	2018	2019	2020	2021	2022
Assessment Area	4.6%	4.0%	3.8%	8.0%	4.9%	3.5%
MSA 45060 (Syracuse, NY)	5.0%	4.3%	4.1%	8.1%	5.0%	3.7%
New York	4.6%	4.1%	3.8%	9.9%	6.9%	4.7%

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

Additional performance context data for this assessment area is provided in the following MSA 45060 (Syracuse, NY) Assessment Area Demographics Table:

MSA 45060 (Syracuse, NY) Assessment Area Demographics Table-2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	18	12.7	8,589	7.6	3,577	41.6	24,328	21.5
Moderate-income	21	14.8	14,545	12.9	2,563	17.6	18,622	16.5
Middle-income	54	38.0	45,185	39.9	2,918	6.5	22,652	20.0
Upper income	42	29.6	43,287	38.3	1,513	3.5	47,504	42.0
Unknown income	7	4.9	1,500	1.3	666	44.4	0	0.0

Total Assessment Area	142	100.0	113,106	100.0	11,237	9.9	113,106	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	21,835	3,763	3.1	17.2	13,598	62.3	4,474	20.5
Moderate-income	31,472	13,093	10.7	41.6	14,457	45.9	3,922	12.5
Middle-income	81,592	53,317	43.7	65.3	21,343	26.2	6,932	8.5
Upper income	67,947	51,052	41.9	75.1	12,171	17.9	4,724	7.0
Unknown income	6,222	677	0.6	10.9	3,878	62.3	1,667	26.8
Total Assessment Area	209,068	121,902	100.0	58.3	65,447	31.3	21,719	10.4
	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,613	8.6	1,336	8.0	264	14.1	13	6.7
Moderate-income	2,127	11.4	1,894	11.4	214	11.4	19	9.8
Middle-income	7,582	40.5	6,673	40.0	836	44.5	73	37.6
Upper income	6,103	32.6	5,644	33.9	383	20.4	76	39.2
Unknown income	1,314	7.0	1,121	6.7	180	9.6	13	6.7
Total Assessment Area	18,739	100.0	16,668	100.0	1,877	100.0	194	100.0
	Percentage of Total Businesses:			88.9		10.0		1.0
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.4	1	0.4	0	0.0	0	0.0
Moderate-income	7	2.9	7	3.0	0	0.0	0	0.0
Middle-income	131	53.5	124	53.0	7	63.6	0	0.0
Upper income	102	41.6	99	42.3	3	27.3	0	0.0
Unknown income	4	1.6	3	1.3	1	9.1	0	0.0

Total Assessment Area	245	100.0	234	100.0	11	100.0	0	.0
	Percentage of Total Farms:			95.5		4.5		.0
<i>2022 FFIEC Census Data and 2022 Dun and Bradstreet Information</i>								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

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

Solvay participated in the SBA Paycheck Protection Program and originated 1,146 PPP loans totaling \$117.0 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 Solvay’s PPP loans were made in amounts of under \$1 million. Bank participation in this lending program met the credit needs to particularly small businesses, where 875 or 76.4% of PPP loans were loans under \$100,000. 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. Solvay made eight PPP loans for a total of \$10.5 million, which qualified as community development loans.

Loan-to-Deposit Ratio

Solvay’s loan-to-deposit (“LTD”) ratio was reasonable given the bank’s size, financial condition, and the opportunities and the credit needs of its assessment area. Solvay’s average LTD ratio for the 24-quarters from January 1, 2017, to December 31, 2022, was 68.9 percent, which is comparable to the previous examination’s 13-quarter average of 66.0 percent, indicating consistent willingness to lend and meet the credit needs of the assessment area. The bank’s average LTD ratio over the evaluation period was comparable to four similarly situated banks headquartered in upstate New York with branches in Solvay’s assessment area.

Lending in the Assessment Area

Solvay made a substantial majority of its loans inside the assessment area, as shown in the following table. During the review period, Solvay originated 92.7 percent of its loans by number and 90.6 percent by dollar volume inside the assessment area. This represents an improvement when compared to the prior evaluation, during which Solvay originated 89.8 percent of its loans by number and 89.1 percent by dollar volume inside the assessment area.

Lending Inside and Outside the Assessment Area January 1, 2017 – December 31, 2017								
2017 Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	52	94.5	5,280	86.8	3	5.5	803	13.2
Home Purchase	147	87.5	23,159	88.3	21	12.5	3,064	11.7
Multi-Family Housing	1	100.0	6,497	100.0	0	0.0	0	0.0
Refinancing	55	85.9	6,161	80.5	9	14.1	1,495	19.5
Total HMDA	255	88.5	41,097	88.5	33	11.5	5,362	11.5
Total Small Business	298	91.1	73,722	90.5	29	8.9	7,774	9.5
Total Loans	553	89.9	114,819	89.7	62	10.1	13,136	10.3
2018-2022 Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	110	94.0	8,167	94.2	7	6.0	505	5.8
Home Purchase	672	89.4	137,705	88.6	80	10.6	17,714	11.4
Loan Purpose Not Applicable	20	95.2	1,288	95.6	1	4.8	59	4.4
Multi-Family Housing	24	72.7	35,377	81.6	9	27.3	7,962	18.4
Refinancing	462	91.3	75,460	91.1	44	8.7	7,355	8.9
Total HMDA	1,288	90.1	257,997	88.5	141	9.9	33,595	11.5
Total Small Business	2,405	94.9	319,951	92.7	129	5.1	25,129	7.3
Total Loans	3,693	93.2	577,948	90.8	270	6.8	58,724	9.2

Geographic Distribution of Loans

Solvay Bank's overall geographic distribution of HMDA-related and small business loans reflected reasonable penetration throughout the assessment area.

Analysis of Lending Gaps

As shown in the table on the subsequent page, during the evaluation period Solvay made HMDA-related and small business loans in a majority of the census tracts within the MSA 45060 (Syracuse, NY) assessment area.

In 2017, Solvay extended loans in 75.0% of the total tracts in the assessment area. Penetration steadily improved in 2018, 2019, 2020, and 2021 to 76.4%, 81.4%, 84.3%, and 90.7%, respectively. In 2022, overall penetration decreased to 71.8%. In addition, there were few occurrences of low penetration in low-income census tracts during the evaluation period. Throughout the evaluation period, Solvay maintained higher percentages of lending penetration in

middle- and upper-income census tracts which compose 67.6% of the assessment area. Opportunities to make HMDA-related loans in low-income census tracts were limited. According to 2020 Census Data, of the 21,835 housing units in low-income census tracts of which 3.1% were owner-occupied, 62.3% were rental units, and 20.5% were vacant.

Lending Gap Analysis - MSA 45060 (Syracuse, NY)			
January 1, 2017 - December 31, 2022			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
2017			
Low	23	10	57%
Moderate	20	8	60%
Middle	50	9	82%
Upper	42	4	90%
Income Unknown	5	4	20%
2018			
Low	23	13	43%
Moderate	20	5	75%
Middle	50	4	92%
Upper	42	7	83%
Income Unknown	5	4	20%
2019			
Low	23	7	70%
Moderate	20	8	60%
Middle	50	4	92%
Upper	42	3	93%
Income Unknown	5	4	20%
2020			
Low	23	12	48%
Moderate	20	3	85%
Middle	50	1	98%
Upper	42	3	93%
Income Unknown	5	3	40%
2021			
Low	23	6	74%
Moderate	20	3	85%
Middle	50	2	96%
Upper	42	1	98%
Income Unknown	5	1	80%
2022			
Low	18	8	56%

Moderate	21	8	62%
Middle	54	13	76%
Upper	42	5	88%
Income Unknown	7	6	14%

Home Purchase Loans

The geographic distribution of home purchase loans reflected reasonable dispersion throughout the assessment area.

In 2022, the bank made 7.6% of home purchase loans by number and 3.0% by dollar in low-income census tracts. Solvay's home purchase lending performance in low-income census tracts was significantly above the 3.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.6% by number and 1.8% by dollar in low-income census tracts. In 2022, the bank made 10.1% of home purchase loans by number and 7.3% by dollar in moderate-income census tracts. The bank's home purchase lending performance was similar to the 10.7% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 14.3% by number and 9.4% by dollar of home purchase loans in moderate-income census tracts.

In 2021, the bank made 7.1% of home purchase loans by number and 2.6 % by dollar in low-income census tracts. Solvay's home purchase lending performance in low-income census tracts was significantly above the 3.8% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 3.7% by number and 2.1% by dollar in low-income census tracts. In 2021, the bank made 11.3% of home purchase loans by number and 4.6% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 8.7% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 10.4% by number and 6.6% by dollar of home purchase loans in moderate-income census tracts.

In 2020, the bank made did not make any home purchase loans in low-income census tracts This performance was significantly below the 3.8% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate performance, which made 2.5% by number and 1.5% by dollar in low-income census tracts. In 2020, the bank made 4.1% of home purchase loans by number and 1.8% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and was significantly below the aggregate, which made 9.3% by number and 5.7% by dollar of home purchase loans in moderate-income census tracts.

In 2019, the bank made one loan or 0.7% by number and 0.4% by dollar in low-income census tracts. Solvay's home purchase lending performance in low-income census tracts was significantly below the 3.8% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate, which made 2.3% by number and 1.2% by dollar in low-income census tracts. In 2019, the bank made 3.6% of home purchase loans by number and 1.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and was significantly below the aggregate, which made 9.0% by number and 5.7% by dollar of home purchase loans in moderate-income census tracts.

In 2018, the bank did not make any home purchase loans in low-income census tracts. This performance was significantly below the 3.8% of owner-occupied housing units and the aggregate, which made 2.8% by number and 1.5% by dollar of home purchased loans in low-income census tracts. In 2018, the bank made 6.5% of home purchase loans by number and 2.8% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the 8.7% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 9.0% by number and 5.6% by dollar of home purchase loans in moderate-income census tracts.

In 2017, the bank made 2.7% of home purchase loans by number and 1.4% by dollar volume in low-income census tracts. Solvay's home purchase lending performance in low-income census tracts was below the 3.8% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 2.6% by number and 1.9% by dollar in low-income census tracts. In 2017, the bank made 6.1% of home purchase loans by number and 3.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the 8.7% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 9.6% by number and 13.6% by dollar of home purchase loans in moderate-income census tracts.

Home Refinance Loans

The geographic distribution of home refinance loans reflected poor dispersion throughout the assessment area.

In 2022, the bank did not make any home refinance loans in low-income census tracts. This lending performance was significantly below 3.1% of owner-occupied housing units located in low-income census tracts and the aggregate, which made 1.4% by number and 1.0% by dollar of refinance loans in low-income census tracts. In 2022, the bank made 3.9% by number and 4.4% by dollar of home refinance loans in moderate-income census tracts. Solvay's home refinance lending performance in moderate-income census tracts was significantly below the 10.7% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 8.6% by number and 5.8% by dollar of home refinance loans in moderate-income census tracts.

In 2021, the bank made 0.6% by number and 0.4% by dollar of home refinance loans in low-income census tracts. The bank's home refinance lending performance in low-income census tracts was significantly below the 3.8% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 1.4% by number and 0.7% by dollar of home refinance loans in low-income census tracts. In 2021, the bank made 3.0% by number and 1.5% by dollar of home refinance loans in moderate-income census tracts. Solvay's home refinance lending performance in moderate-income census tracts was significantly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 5.9% by number and 3.5% by dollar of home refinance loans in moderate-income census tracts.

In 2020, the bank did not make any home refinance loans in low-income census tracts and its performance in low-income census tracts was significantly below the 3.8 percent of owner-occupied housing units located in low-income census tracts and the aggregate performance, which made 0.8% by number and 0.5% by dollar of refinance loans in low-income census tracts. In 2020, the bank made 4.6% by number and 1.8% by dollar of home refinance loans in moderate-income census tracts. Solvay's home refinance lending performance in moderate-income census tracts was below the 8.7% of owner-occupied housing units located in moderate-income census tracts and slightly above the aggregate, which made 4.0% by number and 2.0% by dollar of home refinance loans in moderate-income census tracts.

In 2019, the bank made 1.5% by number and 0.4% by dollar of home refinance loans in low-income census tracts. Solvay's home refinance lending performance in low-income census tracts was significantly below the 3.8% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made 1.9% by number and 1.1% by dollar of home refinance loans in low-income census tracts. In 2019, the bank made 1.5% by number and 0.9% by dollar of home refinance loans in moderate-income census tracts. Solvay's home refinance lending performance in moderate-income census tracts was significantly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 6.4% by number and 3.8% by dollar of home refinance loans in moderate-income census tracts.

In 2018, the bank made 1.9% by number and 0.6% by dollar of home refinance loans in low-income census tracts. The bank's home refinance lending performance in low-income census tracts was below the 3.8% of owner-occupied housing units located in low-income census tracts and similar to the aggregate, which made 1.9% by number and 1.2% by dollar of home refinance loans in low-income census tracts. In 2018, the bank made 7.7% by number and 6.0% by dollar of home refinance loans in moderate-income census tracts. Solvay's home refinance lending performance in moderate-income census tracts was slightly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 7.9% by number and 5.2% by dollar of home refinance loans in moderate-income census tracts.

In 2017, the bank made 1.8% by number and 1.2% by dollar of home refinance loans in low-income census tracts. The bank's home refinance lending performance in low-income census tracts was significantly below the 3.8% of owner-occupied housing units located in low-income census tracts and slightly below the aggregate, which made 2.4% by number and 13.1% by dollar of home refinance loans in low-income census tracts. In 2017, the bank made 1.8% by number and 2.4% by dollar of home refinance loans in moderate-income census tracts. Solvay's home refinance lending performance in moderate-income census tracts was significantly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 8.6% by number and 24.7% by dollar of home refinance loans in moderate-income census tracts.

Home Improvement Loans

The geographic distribution of home improvement loans reflected reasonable dispersion throughout the assessment area.

In 2022, the bank made 6.7% by number and 25.8% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly above the 3.1% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.8% by number and 1.4% by dollar of home improvement loans in low-income census tracts. In 2022, the bank made 6.7% by number and 9.2% by dollar of home improvement loans in moderate-income census tracts. Solvay's home improvement lending performance in moderate-income census tracts was below the 10.7% of owner-occupied housing units located in moderate-income census tracts and slightly below the aggregate, which made 8.0% by number and 5.6% by dollar of home improvement loans in moderate-income census tracts.

In 2021, the bank did not make any home improvement loans in low-income census tracts. Solvay's performance in low-income census tracts was significantly below the 3.8% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate performance, which made 1.6% by number and 1.2% by dollar of home improvement loans in low-income census tracts. In 2021, the bank did not make any home improvement loans in moderate-income census tracts. Solvay's home improvement lending performance in moderate-income census tracts was significantly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 6.3% by number and 4.0% by dollar of home improvement loans in moderate-income census tracts.

In 2020, the bank made 8.3% by number and 33.5% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was significantly above the 3.8% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 2.8% by number and 2.1% by dollar of home improvement loans in low-income census tracts. In 2020, the bank did not make any home improvement loans in moderate-income census tracts. Solvay's performance in moderate-income census tracts was significantly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate performance, which made 5.8% by number and 3.1% by dollar of home improvement loans in moderate-income census tracts.

In 2019, the bank made 3.1% by number and 18.8% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was slightly below the 3.8% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 1.5% by number and 1.6% by dollar of home improvement loans in low-income census tracts. In 2019, the bank made 6.3% by number and 2.1% by dollar of home improvement loans in moderate-income census tracts. Solvay's home improvement lending performance in moderate-income census tracts was below the 8.7% of owner-occupied housing units located in moderate-income census tracts and similar to the aggregate, which made 6.2% by number and 3.7% by dollar of home improvement loans in moderate-income census tracts.

In 2018, the bank did not make any home improvement loans in low-income census tracts. The bank's performance in low-income census tracts was significantly below the 3.8% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate

performance, which made 1.7% by number and 1.4% by dollar of home improvement loans in low-income census tracts. In 2018, the bank made 7.9% by number and 4.8% by dollar of home improvement loans in moderate-income census tracts. Solvay's home improvement lending performance in moderate-income census tracts was similar to the 8.7% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 5.2% by number and 2.7% by dollar of home improvement loans in moderate-income census tracts.

In 2017, the bank made 1.9% by number and 5.0% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending performance in low-income census tracts was below the 3.8% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate, which made 4.9% by number and 4.2% by dollar of home improvement loans in low-income census tracts. In 2017, the bank made 3.8% by number and 0.6% by dollar of home improvement loans in moderate-income census tracts. Solvay's home improvement lending performance in moderate-income census tracts was significantly below the 8.7% of owner-occupied housing units located in moderate-income census tracts and significantly below the aggregate, which made 8.7% by number and 4.8% by dollar of home improvement loans in moderate-income census tracts.

Small Business Loans

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

In 2022, the bank made 15.4% by number and 20.4% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was significantly above the 8.6% of businesses located in low-income census tracts. In 2022, the bank made 9.3% by number and 6.7% by dollar of small business loans in moderate-income census tracts. Solvay's small business lending performance in moderate-income census tracts was slightly below the 11.4% of businesses located in moderate-income census tracts.

In 2021, the bank made 10.4% by number and 17.5% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 10.2% of businesses located in low-income census tracts. In 2021, the bank made 10.0% by number and 9.6% by dollar of small business loans in moderate-income census tracts. Solvay's small business lending performance in moderate-income census tracts was similar to the 9.5% of businesses located in moderate-income census tracts.

In 2020, the bank made 11.3% by number and 17.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly above the 10.1% of businesses located in low-income census tracts. In 2020, the bank made 10.0% by number and 7.7% by dollar of small business loans in moderate-income census tracts. Solvay's small business lending performance in moderate-income census tracts was similar to the 9.5% of businesses located in moderate-income census tracts.

In 2019, the bank made 13.2% by number and 15.3% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was above the 10.2% of businesses located in low-income census. In 2019, the bank made 5.8%

by number and 3.5% by dollar of small business loans in moderate-income census tracts. Solvay's small business lending performance in moderate-income census tracts was below the 9.7% of businesses located in moderate-income census tracts.

In 2018, the bank made 12.4% by number and 17.8% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly above the 10.1% of businesses located in low-income census tracts. In 2018, the bank made 6.5% by number and 5.7% by dollar of small business loans in moderate-income census tracts. Solvay's small business lending performance in moderate-income census tracts was below the 9.8% of businesses located in moderate-income census tracts and below the aggregate, which made 9.0% by number and 9.3% by dollar of small business loans in moderate-income census tracts.

In 2017, the bank made 8.1% by number and 3.8% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 10.4% of businesses located in low-income census tracts. In 2017, the bank made 7.0% by number and 6.5% by dollar of small business loans in moderate-income census tracts. Solvay's small business lending performance in moderate-income census tracts was below the 9.6% of businesses located in moderate-income census tracts.

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

Solvay's overall distribution of borrowers in MSA 45060 (Syracuse, NY) reflected reasonable penetration among individuals of different income levels and businesses of different sizes.

Home Purchase Loans

The distribution of borrowers reflected, given the product lines offered, reasonable penetration among low- and moderate-income borrowers for home purchase lending.

In 2022, the bank made 12.6% by number and 4.0% by dollar of home purchase loans to low-income borrowers and was significantly below the 21.5% of low-income families in the assessment area. Performance was slightly above aggregate lending, which made 10.6% by number and 6.1%

by dollar of home purchase loans to low-income borrowers. The bank's lending to moderate-income borrowers was 17.6% by number and 7.7% by dollar, which was below the aggregate performance of 24.1% by number, significantly below the 17.8% by dollar, and similar to the 16.5% of moderate-income families in the assessment area.

In 2021, the bank made 16.3% by number and 6.6% by dollar of home purchase loans to low-income borrowers and was slightly below the 20.9% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 10.2% by number and 6.1% by dollar of home purchase loans to low-income borrowers. The bank's lending to moderate-income borrowers was 19.9% by number and 11.6% by dollar, which was slightly below the aggregate performance of 24.1% by number, below the 18.3% by dollar, and slightly above the 16.2% of moderate-income families in the assessment area.

In 2020, the bank made 2.5% by number and 1.1% by dollar of home purchase loans to low-income borrowers and was significantly below the 20.9% of low-income families in the assessment area.

Performance was significantly below aggregate lending, which made 7.4% by number and 4.2% by dollar of home purchase loans to low-income borrowers. The bank's lending to moderate-income borrowers was 19.7% by number and 10.0% by dollar, which was slightly below the aggregate performance of 23.4% by number, below the 17.0% by dollar, and slightly above the 16.2% of moderate-income families in the assessment area.

In 2019, the bank made 8.8% by number and 4.9% by dollar of home purchase loans to low-income borrowers and was significantly below the 20.9% of low-income families in the assessment area. Performance was slightly below aggregate lending, which made 10.4% by number and 6.0% by dollar of home purchase loans to low-income borrowers. The bank's lending to moderate-income borrowers was 20.4% by number and 13.3% by dollar, which was slightly below the aggregate performance of 25.0% by number, below the 18.9% by dollar, and above the 16.2% of moderate-income families in the assessment area.

In 2018, the bank made 8.5% by number and 4.5% by dollar of home purchase loans to low-income borrowers and was significantly below the 20.9% of low-income families in the assessment area. Performance was slightly below aggregate lending, which made 9.9% by number and 5.5% by dollar of home purchase loans to low-income borrowers. The bank's lending to moderate-income borrowers was 16.3% by number and 11.2% by dollar, which was below the aggregate performance of 24.1% by number, below the 18.3% by dollar, and similar to the 16.2% of moderate-income families in the assessment area.

In 2017, the bank made 4.8% by number and 2.6% by dollar of home purchase loans to low-income borrowers and was significantly below the 20.9% of low-income families in the assessment area. Performance was slightly below aggregate lending, which made 6.3% by number and 2.7% by dollar of home purchase loans to low-income borrowers. The bank's lending to moderate-income borrowers was 15.6% by number and 10.1% by dollar, which was slightly below the aggregate performance of 20.7% by number, slightly below the 11.6% by dollar, and similar to the 16.2% of moderate-income families in the assessment area.

Home Refinance Loans

The distribution of borrowers reflected, given the product lines offered, poor penetration among low-income borrowers and reasonable penetration among moderate-income borrowers for home refinance lending.

In 2022, the bank's home refinance lending to low-income borrowers was 2.0% by number and 0.4% by dollar and was significantly below the aggregate, at 12.1% by number and 7.5% by dollar. The bank's performance was significantly below the 21.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 19.6% by number and 14.1% by dollar, was slightly below the aggregate 23.0% by number, slightly below the 17.9% by dollar, and slightly above the 16.5% of moderate-income families in the assessment area.

In 2021, the bank's lending to low-income borrowers was 2.4% by number and 1.0% by dollar and was significantly below the aggregate, at 6.8% by number and 3.8% by dollar. The bank's performance was significantly below the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 17.1% by number and 10.0% by dollar, was

similar to the aggregate at 18.0% by number, slightly below the 12.4% by dollar, and similar to the 16.2% of moderate-income families in the assessment area.

In 2020, the bank's lending to low-income borrowers was 3.1% by number and 1.4% by dollar and was below the aggregate, at 4.2% by number and 2.1% by dollar. The bank's performance was significantly below the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 13.8% by number and 6.9% by dollar, was similar to the aggregate at 12.9% by number, slightly below the 8.1% by dollar, and below the 16.2% of moderate-income families in the assessment area.

In 2019, the bank's lending to low-income borrowers was 6.2% by number and 1.7% by dollar and was below the aggregate, at 10.6% by number and 5.9% by dollar. The bank's performance was significantly below the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 24.6% by number and 15.6% by dollar, was slightly above the aggregate at 20.6% by number, similar to the 14.8% by dollar, and significantly above the 16.2% of moderate-income families in the assessment area.

In 2018, the bank's lending to low-income borrowers was 9.6% by number and 4.8% by dollar and was slightly below the aggregate, at 11.5% by number and 7.6% by dollar. The bank's performance was significantly below the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 13.5% by number and 11.6% by dollar, was below the aggregate at 20.0% by number, below the 15.6% by dollar, and slightly below the 16.2% of moderate-income families in the assessment area.

In 2017, the bank's lending to low-income borrowers was 3.6% by number and 2.5% by dollar and was below the aggregate, at 6.9% by number and 1.6% by dollar. The bank's performance was significantly below the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 9.1% by number and 7.3% by dollar, was significantly below the aggregate at 18.3% by number, above the 5.0% by dollar, and below the 16.2% of moderate-income families in the assessment area.

Home Improvement Loans

The distribution of borrowers reflected, given the product lines offered, poor penetration among low-income borrowers and reasonable penetration among moderate-income borrowers for home improvement lending.

In 2022, the bank made no loans to low-income borrowers. This performance was significantly below the aggregate lending at 9.5% by number and 6.6% by dollar and the 21.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 26.7% by number and 24.1% by dollar, was slightly above the aggregate at 21.7% by number, above the 17.4% by dollar, and significantly above the 16.2% of moderate-income families in the assessment area.

In 2021, the bank made no loans to low-income borrowers. This performance was significantly below the aggregate at 7.4% by number and 4.9% by dollar and the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 15.4% by number and 8.9% by dollar, was slightly below the aggregate at 19.7% by number, below the 13.8% by dollar, and similar to the 16.2% of moderate-income families in the assessment area.

In 2020, the bank made no loans to low-income borrowers. This performance was significantly below the aggregate at 6.5% by number and 3.3% by dollar and the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 8.3% by number and 9.8% by dollar, was significantly below the aggregate at 18.4% by number, slightly below the 12.6% by dollar, and below the 16.2% of moderate-income families in the assessment area at 16.2%.

In 2019, the bank's lending to low-income borrowers was 9.4% by number and 7.7% by dollar and was similar to the aggregate, at 8.7% by number and 6.7% by dollar. The bank's performance was significantly below the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 25.0% by number and 13.9% by dollar, was above the aggregate at 20.2% by number, similar to the 14.0% by dollar, and significantly above 16.2% of the moderate-income families in the assessment area.

In 2018, the bank's lending to low-income borrowers was 10.5% by number and 9.1% by dollar and was above the aggregate, at 8.3% by number and 6.5% by dollar. The bank's performance was below the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 10.5% by number and 9.7% by dollar, was below the aggregate at 17.4% by number, slightly below the 12.4% by dollar, and below the 16.2% of moderate-income families in the assessment area.

In 2017, the bank's lending to low-income borrowers was 3.8% by number and 1.3% by dollar and was significantly below the aggregate, at 11.9% by number and 4.1% by dollar. The bank's performance was significantly below the 20.9% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 11.5% by number and 2.0% by dollar, was below the aggregate at 21.3% by number, significantly below the 11.1% by dollar, and below the 16.2% of moderate-income families in the assessment area.

Small Business Loans

The distribution of borrowers reflected, given the product lines offered, reasonable penetration among borrowers for small business lending.

In 2022, the bank originated 28.0% of loans by number and 17.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the 88.9% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 52.8% 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 2021, the bank originated 64.3% of loans by number and 23.7% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the

88.9% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 72.6% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2020, the bank originated 54.5% of loans by number and 18.5% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the 88.8% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 66.5% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

In 2019, the bank originated 26.2% of loans by number and 20.7% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the 88.6% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 61.8% 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 33.2% of loans by number and 26.3% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the 88.4% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 60.6% 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 2017, the bank originated 34.2% of loans by number and 17.8% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was significantly below the 88.8% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 62.4% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

Although the bank does not report its small business data, examiners reviewed the aggregate performance to gain insight on the demand for small business lending in the assessment areas. A review of the aggregate data showed that, Solvay's small business performance was not considered unusual given that aggregate performance was also below the demographic for the entire review period, indicating that demand is less than the opportunity to lend in the area. Furthermore, the bank's performance significantly exceeded aggregate data for two years, was slightly below for one year and below for three years. Consistently over the evaluation period, the top five lenders, all large and national institutions, captured over 50.0 % of the market share. This indicates strong competition for small business lending in the assessment area and further supports the bank's reasonable performance among borrowers for small business lending.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

Solvay's performance under the community development test was Satisfactory. Solvay demonstrated adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services as appropriate, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

During the evaluation period, Solvay's community development loans and qualified investments totaled \$37.9 million, comprised of approximately \$19.7 million in community development loans and \$18.2 million in qualified investments. When compared to four other institutions operating within the assessment area, Solvay's annualized community development loans ranked 4th out of 5 peer banks based on Tier 1 Capital, 3rd out of 5 peer banks based average assets; and 4th out of 5 peer banks based on deposits. Solvay's annualized qualified investments ranked 1st out of 5 peer banks based on Tier 1 Capital, average assets, and deposits. Solvay's community development loans and qualified investment activity declined by dollar volume over the 69-month evaluation period to total \$37.9 million while the previous evaluation period included 36 months and totaled \$62.9 million.

A majority of Solvay's community development loans and qualified investments were made within the bank's assessment area. Charitable donations to community development organizations totaled 98 donations for \$128,000. The bank's community development activity also considered the bank's broader statewide or regional area activity, consisting of a majority of Solvay's community development investments for \$17.7 million.

Summary of Community Development Loans and Qualified Investments						
Geography or Assessment Area	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
MSA 45060 (Syracuse, NY) Assessment Area	19,696	38	557	7	20,253	45
Broader Statewide or Regional Area	0	0	17,658	24	17,658	24
Total	19,696	38	18,215	31	37,911	69
<i>Lending activity includes new loans and investments made during the evaluation period, as well as investments with existing balances from the prior evaluation period that were outstanding as of 12/31/2022.</i> <i>Investment activity does not include charitable donations which are assessed separately.</i> <i>Source: Bank Data from 4/1/2017 – 12/31/2022</i>						

Solvay's community development lending and qualified investments were responsive to community needs. In terms of the dollar amount, community services represented the majority of total activity at 45.6%, economic development represented 25.1%, revitalization and stabilization represented 22.4%, and affordable housing represented 6.9% of overall activity. Community contacts identified economic development as a critical need throughout Solvay's assessment area. The subsequent chart details the Bank's total community development loans and qualified investments.

Summary of Community Development Loans and Qualified Investments By Primary Purpose Designation						
Designation	Loans		Investments		Total	
	(\$,000)	#	(\$,000)	#	(\$,000)	#
Affordable Housing	1,695	5	929	1	2,624	6
Community Services	10,061	21	7,212	14	17,273	35
Economic Development	0	0	9,517	9	9,517	9
Revitalize and Stabilize	7,940	12	557	7	8,497	19
Total	19,696	38	18,215	31	37,911	69

Lending activity includes new loans and investments made during the evaluation period, as well as investments with existing balances from the prior evaluation period that were outstanding as of 12/31/2022. Investment activity does not include charitable donations which are assessed separately.
Source: Bank Data from 4/1/2017 – 12/31/2022

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. Solvay made eight PPP loans for a total of \$10.5 million, which qualified as community development loans. This lending activity was considered particularly responsive with the acute credit need that many small businesses experienced throughout the pandemic.

Community Development Loans

Solvay originated 38 community development loans totaling \$19.7 million in the assessment area. Of this total dollar amount of community development loans, 51.1% financed community development services, 40.3% supported the revitalization and stabilization of LMI geographies, and 8.6% was for affordable housing. The subsequent table details Solvay’s loan activity by year and community development purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	0	0	0	0	0	0	5	370	5	370
2018	1	500	6	1,102	0	0	0	0	7	1,602
2019	1	500	1	4	0	0	1	151	3	655
2020	0	0	5	7,132	0	0	2	3,448	7	10,580
2021	3	695	4	881	0	0	4	3,971	11	5,547
2022	0	0	5	942	0	0	0	0	5	942
Total	5	1,695	21	10,061	0	0	12	7,940	38	19,696
Percent of Total	13.2	8.6	55.3	51.1	0.0	0.0	31.6	40.3	100.0%	100.0%

Source: Bank Data from 4/1/2017 – 12/31/2022

Examples of Solvay’s community development loans included:

- A loan totaling \$171,000 to finance the acquisition and rehabilitation of a vacant building, located in a low-income census tract, into a mixed use building with apartments and retail space. Loan proceeds supported a critical infrastructure project that will attract businesses and residents in an area designated for redevelopment by the City of Syracuse.

- Five loans totaling \$1.7 million to a non-profit housing and community development organization that provided affordable housing, home improvement lending programs, and home ownership education and counseling for first-time homebuyers. Loan proceeds were used for working capital and to fund home improvement loans for LMI families.
- A \$3.3 million loan to an organization that provides access to non-emergency medical transportation for low-and moderate-income patients.

Community Development Investments

Solvay’s qualified investment and grant activity totaled \$18.3 million. This includes 8 prior-period investments with a balance of \$2.7 million, 23 new investments for \$15.5 million and charitable donations to community development organizations for \$128,000. In terms of dollar amount, 51.9% of the activity were dedicated to economic development, 40.0% for community services, 5.1% for affordable housing and 3.0% for revitalization and stabilization. The economic development investments were regional pools of Small Business Investment Company certificates that fund small businesses across the state and the broader regional area including the assessment area. This activity was considered particularly responsive as small business funding was a need identified by the community contact. The subsequent table details Solvay’s investment and grant activity by year and community development purpose.

Qualified Investments & Grants										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	1	929	3	1,097	4	663	0	0	8	2,689
2017	1	1	7	1,056	0	0	0	0	8	1,057
2018	1	1	9	16	0	0	0	0	10	17
2019	1	1	12	20	1	1,854	0	0	14	1,875
2020	0	0	9	18	2	3,000	0	0	11	3,018
2021	0	0	54	4,100	1	2,000	0	0	55	6,100
2022	1	5	14	1,025	1	2,000	7	557	23	3,587
Total	5	937	108	7,332	9	9,517	7	557	129	18,343
Percent of Total	3.9	5.1	83.7	40.0	7.0	51.9	5.4	3.0	100.0	100.0

Source: Bank Data from 4/1/2017 – 12/31/2022

Community Development Services

During the evaluation period, Solvay provided 228 instances of community development services, The provision of these services included Solvay officers, directors, and employees serving on boards or committees of non-profit organizations and providing technical assistance. The subsequent table details Solvay’s community service and grant activity by year and community development purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2017	2	20	0	0	22
2018	8	45	0	0	53
2019	7	33	0	0	40
2020	5	23	0	13	41
2021	15	8	0	22	45
2022	9	11	0	7	27
Total	46	140	0	42	228
Percent of Total	20.2	61.4	0.0	18.4	100.0

Source: Bank Data from 4/1/2017 – 12/31/2022

Examples of community development services included:

- Various instances of bank employees providing financial education and assistance to low- and moderate-income borrowers. Specifically, bank employees guided and answered questions of borrowers applying for credit through income restricted housing programs offered by the bank.
- Bank employees participated in presenting financial literacy workshops to various high schools within Onondaga County. The workshops primarily benefited low- and moderate-income students as a majority were eligible for free and reduced lunch.
- Various employees and Board members utilized their financial expertise and leadership by maintaining Board memberships with organizations that address economic development and affordable housing needs within Onondaga County.

In addition, a number of Solvay’s products were responsive to specific community needs in the bank’s assessment area, as illustrated below:

- *Federal Home Loan Bank’s (“FHLB”) First Home Club (“FHC”) Program.* FHLB’s program helps LMI individuals acquire their first home by matching funds saved by the participants. The program is aimed at households with incomes at or below 80% of the median area income. The FHC provides down payment and closing cost assistance by granting four dollars in matching funds for each dollar saved in a dedicated account (up to \$7,500 in matching funds).
- *Solvay Bank Homebuyers Assistance Program (“HAP”).* This program provides a Buyer’s Credit of up to \$1,500 to be used towards closing costs. Low- to moderate-income individuals purchasing a home in Onondaga County are eligible for this program.
- *Partner Lender – Onondaga County.* Onondaga County, through its Homeownership Program, purchases, rehabilitates, and sells single family dwellings at a subsidized price to qualifying home buyers, along with grants up to \$30,000. As a partner lender, Solvay provides mortgage financing options to qualified participants.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Solvay 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.

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

Home Mortgage Lending by Income Level of Geography

Distribution of 2017 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 45060 (Syracuse, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	4	2.7	2.6	321	1.4	1.9	3.8
Moderate	9	6.1	9.6	857	3.7	13.6	8.7
Middle	50	34.0	44.2	5,889	25.4	41.6	44.8
Upper	84	57.1	43.5	16,092	69.5	42.8	42.6
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	147	100.0	100.0	23,159	100.0	100.0	100.0
Refinance Loans							
Low	1	1.8	2.4	74	1.2	13.1	3.8
Moderate	1	1.8	8.6	150	2.4	24.7	8.7
Middle	30	54.5	43.8	2,593	42.1	37.3	44.8
Upper	23	41.8	45.1	3,344	54.3	24.9	42.6
Unknown	0	0.0	0.1	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	55	100.0	100.0	6,161	100.0	100.0	100.0
Home Improvement Loans							
Low	1	1.9	4.9	263	5.0	4.2	3.8
Moderate	2	3.8	8.7	34	0.6	4.8	8.7
Middle	19	36.5	46.6	1,262	23.9	36.4	44.8
Upper	30	57.7	39.5	3,721	70.5	54.4	42.6
Unknown	0	0.0	0.4	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	52	100.0	100.0	5,280	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	10.8	0	0.0	39.5	21.8
Moderate	0	0.0	18.9	0	0.0	1.5	20.4
Middle	1	100.0	29.7	6,497	100.0	8.5	31.0
Upper	0	0.0	37.8	0	0.0	47.0	20.5
Unknown	0	0.0	2.7	0	0.0	3.5	6.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	6,497	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	6	2.4	2.9	658	1.6	8.6	3.8
Moderate	12	4.7	9.3	1,041	2.5	15.5	8.7
Middle	100	39.2	44.4	16,241	39.5	37.3	44.8
Upper	137	53.7	43.3	23,157	56.3	38.3	42.6
Unknown	0	0.0	0.2	0	0.0	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	255	100.0	100.0	41,097	100.0	100.0	100.0

Source: 2017 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 45060 (Syracuse, NY)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.8	0	0.0	1.5	3.8
Moderate	10	6.5	9.0	740	2.8	5.6	8.7
Middle	65	42.5	45.6	9,507	36.2	40.2	44.8
Upper	78	51.0	42.5	16,018	61.0	52.5	42.6
Unknown	0	0.0	0.2	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	153	100.0	100.0	26,265	100.0	100.0	100.0
Refinance Loans							
Low	1	1.9	1.9	30	0.6	1.2	3.8
Moderate	4	7.7	7.9	293	6.0	5.2	8.7
Middle	23	44.2	43.1	1,822	37.2	38.7	44.8
Upper	24	46.2	47.1	2,750	56.2	54.8	42.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	52	100.0	100.0	4,895	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.7	0	0.0	1.4	3.8
Moderate	3	7.9	5.2	97	4.8	2.7	8.7
Middle	10	26.3	41.6	434	21.6	33.9	44.8
Upper	25	65.8	51.4	1,478	73.6	61.9	42.6
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	2,009	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	28.9	0	0.0	4.8	21.8
Moderate	0	0.0	21.1	0	0.0	4.0	20.4
Middle	0	0.0	23.7	0	0.0	34.9	31.0
Upper	1	100.0	21.1	275	100.0	29.1	20.5
Unknown	0	0.0	5.3	0	0.0	27.3	6.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	275	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	0.4	2.7	30	0.1	1.9	3.8
Moderate	17	7.0	8.4	1,130	3.4	5.3	8.7
Middle	98	40.2	44.4	11,763	35.2	39.0	44.8
Upper	128	52.5	44.3	20,521	61.4	50.5	42.6
Unknown	0	0.0	0.2	0	0.0	3.5	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	244	100.0	100.0	33,444	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

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

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

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	0.7	2.3	107	0.4	1.2	0	0.0	2.5	0	0.0	1.5	3.8
Moderate	5	3.6	9.0	412	1.7	5.7	5	4.1	9.3	463	1.8	5.7	8.7
Middle	54	39.4	44.6	7,544	31.0	38.1	44	36.1	43.2	6,807	26.4	36.3	44.8
Upper	77	56.2	43.9	16,300	66.9	54.9	73	59.8	44.7	18,545	71.8	56.2	42.6
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	137	100.0	100.0	24,363	100.0	100.0	122	100.0	100.0	25,815	100.0	100.0	100.0
Refinance Loans													
Low	1	1.5	1.9	37	0.4	1.1	0	0.0	0.8	0	0.0	0.5	3.8
Moderate	1	1.5	6.4	82	0.9	3.8	6	4.6	4.0	462	1.8	2.0	8.7
Middle	19	29.2	42.4	1,741	19.0	34.2	47	36.2	37.4	5,841	23.0	30.0	44.8
Upper	44	67.7	49.0	7,289	79.7	60.5	77	59.2	57.7	19,132	75.2	67.5	42.6
Unknown	0	0.0	0.2	0	0.0	0.4	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	65	100.0	100.0	9,149	100.0	100.0	130	100.0	100.0	25,435	100.0	100.0	100.0
Home Improvement Loans													
Low	1	3.1	1.5	450	18.8	1.6	1	8.3	2.8	601	33.5	2.1	3.8
Moderate	2	6.3	6.2	50	2.1	3.7	0	0.0	5.8	0	0.0	3.1	8.7
Middle	14	43.8	43.0	692	28.9	36.0	5	41.7	43.0	765	42.7	34.2	44.8
Upper	15	46.9	49.2	1,203	50.2	58.7	6	50.0	48.4	426	23.8	60.5	42.6
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	32	100.0	100.0	2,395	100.0	100.0	12	100.0	100.0	1,792	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	26.7	0	0.0	5.0	0	0.0	25.9	0	0.0	8.1	21.8
Moderate	1	16.7	14.7	620	15.5	16.9	0	0.0	18.5	0	0.0	7.1	20.4
Middle	2	33.3	26.7	862	21.6	46.2	1	50.0	27.8	1,800	49.3	53.8	31.0
Upper	3	50.0	32.0	2,513	62.9	31.9	1	50.0	27.8	1,848	50.7	31.1	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	6.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	3,995	100.0	100.0	2	100.0	100.0	3,648	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	15	5.8	2.4	1,333	3.2	1.8	1	0.4	2.0	601	1.1	1.6	3.8
Moderate	16	6.2	8.3	1,670	4.1	7.0	11	4.1	7.1	925	1.6	4.4	8.7
Middle	90	34.6	44.1	10,884	26.4	38.7	97	36.5	41.4	15,213	26.8	35.6	44.8
Upper	139	53.5	45.0	27,305	66.3	52.3	157	59.0	49.3	39,951	70.5	58.2	42.6
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	260	100.0	100.0	41,190	100.0	100.0	266	100.0	100.0	56,690	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

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

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

Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	10	7.1	3.7	744	2.6	2.1	9	7.6	3.6	979	3.0	1.8	3.1
Moderate	16	11.3	10.4	1,334	4.6	6.6	12	10.1	14.3	2,375	7.3	9.4	10.7
Middle	46	32.6	44.9	8,439	29.2	39.0	47	39.5	41.8	9,714	30.1	38.7	43.7
Upper	68	48.2	40.8	18,306	63.2	52.0	50	42.0	39.5	18,827	58.3	49.4	41.9
Unknown	1	0.7	0.2	124	0.4	0.2	1	0.8	0.8	420	1.3	0.8	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	141	100.0	100.0	28,947	100.0	100.0	119	100.0	100.0	32,315	100.0	100.0	100.0
Refinance Loans													
Low	1	0.6	1.4	115	0.4	0.7	0	0.0	1.4	0	0.0	1.0	3.1
Moderate	5	3.0	5.9	432	1.5	3.5	2	3.9	8.6	306	4.4	5.8	10.7
Middle	63	38.4	41.6	9,292	32.0	35.1	19	37.3	43.0	2,761	39.9	40.2	43.7
Upper	95	57.9	51.1	19,227	66.1	60.6	30	58.8	46.3	3,848	55.6	51.9	41.9
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.7	0	0.0	1.1	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	164	100.0	100.0	29,066	100.0	100.0	51	100.0	100.0	6,915	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.6	0	0.0	1.2	1	6.7	1.8	277	25.8	1.4	3.1
Moderate	0	0.0	6.3	0	0.0	4.0	1	6.7	8.0	99	9.2	5.6	10.7
Middle	5	38.5	42.0	227	25.3	35.1	4	26.7	42.8	205	19.1	41.4	43.7
Upper	8	61.5	50.1	672	74.7	59.7	9	60.0	47.0	491	45.8	50.9	41.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.6	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	899	100.0	100.0	15	100.0	100.0	1,072	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	27.8	0	0.0	22.5	1	20.0	18.2	1,400	28.2	6.4	21.4
Moderate	3	30.0	27.8	673	3.0	10.7	0	0.0	26.0	0	0.0	7.3	17.7
Middle	4	40.0	23.6	6,985	31.0	43.4	3	60.0	28.6	3,163	63.7	15.9	30.7
Upper	2	20.0	19.4	6,838	30.4	21.3	0	0.0	10.4	0	0.0	14.9	22.1
Unknown	1	10.0	1.4	8,000	35.6	2.1	1	20.0	16.9	400	8.1	55.4	8.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	22,496	100.0	100.0	5	100.0	100.0	4,963	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	11	3.4	2.7	859	1.1	4.3	11	5.8	2.8	2,656	5.9	2.4	3.1
Moderate	24	7.3	8.2	2,439	3.0	6.0	15	7.9	11.8	2,780	6.1	8.1	10.7
Middle	118	36.0	43.3	24,943	30.6	38.1	73	38.4	42.1	15,843	35.0	35.3	43.7
Upper	173	52.7	45.7	45,043	55.3	51.3	89	46.8	42.5	23,166	51.2	44.4	41.9
Unknown	2	0.6	0.1	8,124	10.0	0.4	2	1.1	0.8	820	1.8	9.9	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	328	100.0	100.0	81,408	100.0	100.0	190	100.0	100.0	45,265	100.0	100.0	100.0
<p>2016-2020 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.</p>													

Home Mortgage Lending by Borrower Income Level

Distribution of 2017 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 45060 (Syracuse, NY)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	7	4.8	6.3	602	2.6	2.7	20.9
Moderate	23	15.6	20.7	2,333	10.1	11.6	16.2
Middle	40	27.2	22.0	5,344	23.1	15.4	19.9
Upper	71	48.3	34.8	14,239	61.5	37.1	43.1
Unknown	6	4.1	16.2	641	2.8	33.3	0.0
Total	147	100.0	100.0	23,159	100.0	100.0	100.0
Refinance Loans							
Low	2	3.6	6.9	153	2.5	1.6	20.9
Moderate	5	9.1	18.3	450	7.3	5.0	16.2
Middle	18	32.7	23.6	1,578	25.6	7.8	19.9
Upper	29	52.7	38.4	3,830	62.2	18.7	43.1
Unknown	1	1.8	12.9	150	2.4	66.9	0.0
Total	55	100.0	100.0	6,161	100.0	100.0	100.0
Home Improvement Loans							
Low	2	3.8	11.9	68	1.3	4.1	20.9
Moderate	6	11.5	21.3	108	2.0	11.1	16.2
Middle	18	34.6	26.5	613	11.6	19.3	19.9
Upper	24	46.2	38.0	3,983	75.4	59.5	43.1
Unknown	2	3.8	2.2	508	9.6	5.9	0.0
Total	52	100.0	100.0	5,280	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	11	4.3	7.1	823	2.4	2.4	20.9
Moderate	34	13.4	20.3	2,891	8.4	9.5	16.2
Middle	76	29.9	22.9	7,535	21.8	13.1	19.9
Upper	124	48.8	35.9	22,052	63.7	31.8	43.1
Unknown	9	3.5	13.8	1,299	3.8	43.2	0.0
Total	254	100.0	100.0	34,600	100.0	100.0	100.0
<p>Source: 2017 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: MSA 45060 (Syracuse, NY)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	13	8.5	9.9	1,181	4.5	5.5	20.9
Moderate	25	16.3	24.1	2,954	11.2	18.3	16.2
Middle	23	15.0	23.0	2,714	10.3	21.6	19.9
Upper	86	56.2	35.2	18,549	70.6	46.7	43.1
Unknown	6	3.9	7.8	867	3.3	7.9	0.0
Total	153	100.0	100.0	26,265	100.0	100.0	100.0
Refinance Loans							
Low	5	9.6	11.5	234	4.8	7.6	20.9
Moderate	7	13.5	20.0	567	11.6	15.6	16.2
Middle	13	25.0	24.2	1,333	27.2	22.7	19.9
Upper	25	48.1	38.8	2,584	52.8	48.2	43.1
Unknown	2	3.8	5.4	177	3.6	5.8	0.0
Total	52	100.0	100.0	4,895	100.0	100.0	100.0
Home Improvement Loans							
Low	4	10.5	8.3	182	9.1	6.5	20.9
Moderate	4	10.5	17.4	195	9.7	12.4	16.2
Middle	12	31.6	25.4	386	19.2	21.8	19.9
Upper	14	36.8	46.8	701	34.9	56.8	43.1
Unknown	4	10.5	2.1	545	27.1	2.4	0.0
Total	38	100.0	100.0	2,009	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	22	9.1	9.9	1,597	4.8	5.9	20.9
Moderate	36	14.8	21.5	3,716	11.2	16.9	16.2
Middle	48	19.8	22.8	4,433	13.4	21.3	19.9
Upper	125	51.4	36.5	21,834	65.8	46.8	43.1
Unknown	12	4.9	9.4	1,589	4.8	9.1	0.0
Total	243	100.0	100.0	33,169	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 45060 (Syracuse, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	12	8.8	10.4	1,195	4.9	6.0	3	2.5	7.4	283	1.1	4.2	20.9
Moderate	28	20.4	25.0	3,251	13.3	18.9	24	19.7	23.4	2,584	10.0	17.0	16.2
Middle	27	19.7	22.3	4,032	16.5	21.2	17	13.9	23.6	2,771	10.7	21.7	19.9
Upper	67	48.9	31.0	15,350	63.0	42.9	75	61.5	34.6	19,860	76.9	46.3	43.1
Unknown	3	2.2	11.3	535	2.2	11.0	3	2.5	11.0	317	1.2	10.6	0.0
Total	137	100.0	100.0	24,363	100.0	100.0	122	100.0	100.0	25,815	100.0	100.0	100.0
Refinance Loans													
Low	4	6.2	10.6	152	1.7	5.9	4	3.1	4.2	344	1.4	2.1	20.9
Moderate	16	24.6	20.6	1,429	15.6	14.8	18	13.8	12.9	1,757	6.9	8.1	16.2
Middle	11	16.9	22.6	863	9.4	19.4	29	22.3	22.6	3,789	14.9	17.8	19.9
Upper	30	46.2	39.0	6,130	67.0	50.9	69	53.1	50.7	18,462	72.6	61.1	43.1
Unknown	4	6.2	7.2	575	6.3	9.0	10	7.7	9.5	1,083	4.3	10.9	0.0
Total	65	100.0	100.0	9,149	100.0	100.0	130	100.0	100.0	25,435	100.0	100.0	100.0
Home Improvement Loans													
Low	3	9.4	8.7	185	7.7	6.7	0	0.0	6.5	0	0.0	3.3	20.9
Moderate	8	25.0	20.2	332	13.9	14.0	1	8.3	18.4	176	9.8	12.6	16.2
Middle	11	34.4	27.4	808	33.7	24.7	5	41.7	25.7	200	11.2	18.9	19.9
Upper	8	25.0	42.2	600	25.1	52.4	3	25.0	47.1	155	8.6	60.4	43.1
Unknown	2	6.3	1.6	470	19.6	2.2	3	25.0	2.2	1,261	70.4	4.9	0.0
Total	32	100.0	100.0	2,395	100.0	100.0	12	100.0	100.0	1,792	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	37	14.6	10.4	2,665	7.2	6.1	7	2.7	5.8	627	1.2	3.2	20.9
Moderate	53	20.9	22.4	5,091	13.7	17.3	43	16.3	17.4	4,517	8.5	12.6	16.2
Middle	50	19.7	22.3	5,779	15.5	20.5	51	19.3	22.0	6,760	12.7	19.1	19.9
Upper	105	41.3	33.4	22,080	59.4	44.4	147	55.7	40.2	38,477	72.5	51.4	43.1
Unknown	9	3.5	11.5	1,580	4.2	11.1	16	6.1	14.6	2,661	5.0	13.7	0.0
Total	254	100.0	100.0	37,195	100.0	100.0	264	100.0	100.0	53,042	100.0	100.0	100.0
Source: 2020 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 45060 (Syracuse, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	23	16.3	10.2	1,903	6.6	6.1	15	12.6	10.6	1,293	4.0	6.1	21.5
Moderate	28	19.9	24.1	3,359	11.6	18.3	21	17.6	24.1	2,497	7.7	17.8	16.5
Middle	18	12.8	21.7	3,486	12.0	20.5	19	16.0	22.5	3,062	9.5	21.0	20.0
Upper	68	48.2	31.6	19,424	67.1	43.5	62	52.1	31.4	24,809	76.8	45.0	42.0
Unknown	4	2.8	12.3	775	2.7	11.6	2	1.7	11.4	654	2.0	10.2	0.0
Total	141	100.0	100.0	28,947	100.0	100.0	119	100.0	100.0	32,315	100.0	100.0	100.0
Refinance Loans													
Low	4	2.4	6.8	279	1.0	3.8	1	2.0	12.1	30	0.4	7.5	21.5
Moderate	28	17.1	18.0	2,905	10.0	12.4	10	19.6	23.0	976	14.1	17.9	16.5
Middle	36	22.0	24.8	4,998	17.2	20.8	10	19.6	25.7	1,247	18.0	23.4	20.0
Upper	90	54.9	41.1	20,033	68.9	52.5	27	52.9	32.1	4,306	62.3	42.2	42.0
Unknown	6	3.7	9.3	851	2.9	10.6	3	5.9	7.1	356	5.1	9.0	0.0
Total	164	100.0	100.0	29,066	100.0	100.0	51	100.0	100.0	6,915	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.4	0	0.0	4.9	0	0.0	9.5	0	0.0	6.6	21.5
Moderate	2	15.4	19.7	80	8.9	13.8	4	26.7	21.7	258	24.1	17.4	16.5
Middle	3	23.1	27.1	122	13.6	21.9	2	13.3	27.1	57	5.3	22.8	20.0
Upper	8	61.5	43.9	697	77.5	57.0	8	53.3	40.3	480	44.8	51.2	42.0
Unknown	0	0.0	1.9	0	0.0	2.2	1	6.7	1.4	277	25.8	2.0	0.0
Total	13	100.0	100.0	899	100.0	100.0	15	100.0	100.0	1,072	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	27	8.5	8.4	2,182	3.7	5.1	16	8.6	10.6	1,323	3.3	6.4	21.5
Moderate	58	18.2	20.7	6,344	10.8	15.5	35	18.9	23.1	3,731	9.3	17.7	16.5
Middle	57	17.9	23.2	8,606	14.6	20.5	31	16.8	23.8	4,366	10.8	21.5	20.0
Upper	166	52.2	36.5	40,154	68.2	47.5	97	52.4	33.0	29,595	73.4	44.7	42.0
Unknown	10	3.1	11.2	1,626	2.8	11.4	6	3.2	9.5	1,287	3.2	9.7	0.0
Total	318	100.0	100.0	58,912	100.0	100.0	185	100.0	100.0	40,302	100.0	100.0	100.0
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Small Business Lending by Income Level of Geography

Distribution of 2017 and 2018 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2017						2018						
	Bank		Agg	Bank			Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	24	8.1	7.6	2,772	3.8	9.4	48	12.4	8.7	9,988	17.8	10.8	10.1
Moderate	21	7.0	9.2	4,808	6.5	8.4	25	6.5	9.0	3,215	5.7	9.3	9.8
Middle	143	48.0	39.0	18,775	25.5	43.1	189	49.0	38.4	22,317	39.7	39.6	39.5
Upper	83	27.9	41.1	33,652	45.6	35.0	102	26.4	40.6	15,222	27.1	36.4	37.9
Unknown	27	9.1	2.2	13,715	18.6	3.9	22	5.7	2.3	5,506	9.8	3.6	2.7
Tract-Unk	0	0.0	0.9	0	0.0	0.2	0	0.0	1.0	0	0.0	0.3	
Total	298	100.0	100.0	73,722	100.0	100.0	386	100.0	100.0	56,248	100.0	100.0	100.0

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

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank			Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	43	13.2	8.5	7,180	15.3	8.2	85	11.3	8.7	17,361	17.2	10.2	10.1
Moderate	19	5.8	8.5	1,640	3.5	7.5	75	10.0	8.9	7,814	7.7	8.7	9.5
Middle	160	49.2	38.4	19,531	41.6	43.8	334	44.5	39.9	41,904	41.5	43.0	39.6
Upper	88	27.1	41.0	14,438	30.7	35.6	237	31.6	39.2	31,562	31.2	32.7	38.1
Unknown	15	4.6	2.5	4,209	9.0	4.6	19	2.5	2.9	2,449	2.4	5.3	2.8
Tract-Unk	0	0.0	1.1	0	0.0	0.3	0	0.0	0.3	0	0.0	0.1	
Total	325	100.0	100.0	46,998	100.0	100.0	750	100.0	100.0	101,090	100.0	100.0	100.0

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

Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 45060 (Syracuse, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	76	10.4	8.4	13,410	17.5	10.2	33	15.4	6.9	7,962	20.4	6.6	8.6
Moderate	73	10.0	9.4	7,381	9.6	9.9	20	9.3	13.3	2,624	6.7	14.7	11.4
Middle	333	45.6	39.9	28,668	37.5	42.5	100	46.7	40.3	18,679	47.8	40.4	40.5
Upper	238	32.6	39.6	25,254	33.0	32.3	50	23.4	33.6	7,787	19.9	31.4	32.6
Unknown	11	1.5	2.5	1,819	2.4	4.9	11	5.1	5.4	2,034	5.2	6.7	7.0
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.5	0	0.0	0.2	
Total	731	100.0	100.0	76,532	100.0	100.0	214	100.0	100.0	39,086	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending by Borrower Income Level

Distribution of 2017 and 2018 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 45060 (Syracuse, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2017						2018						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	102	34.2	45.8	13,132	17.8	27.8	128	33.2	43.1	14,793	26.3	29.8	88.4
Over \$1 Million	196	65.8		60,590	82.2		258	66.8		41,455	73.7		10.5
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.1
Total	298	100.0		73,722	100.0		386	100.0		56,248	100.0		100.0
By Loan Size													
\$100,000 or Less	186	62.4	90.7	7,379	10.0	28.3	234	60.6	91.9	8,462	15.0	32.5	
\$100,001 - \$250,000	46	15.4	4.3	7,835	10.6	15.0	78	20.2	4.2	13,810	24.6	16.6	
\$250,001 - \$1 Million	56	18.8	5.0	32,423	44.0	56.8	74	19.2	3.9	33,976	60.4	50.9	
Total	298	100.0	100.0	73,722	100.0	100.0	386	100.0	100.0	56,248	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	72	70.6		2,803	21.3		96	75.0		3,502	23.7		
\$100,001 - \$250,000	17	16.7		2,873	21.9		18	14.1		3,101	21.0		
\$250,001 - \$1 Million	13	12.7		7,456	56.8		14	10.9		8,190	55.4		
Total	102	100.0		13,132	100.0		128	100.0		14,793	100.0		

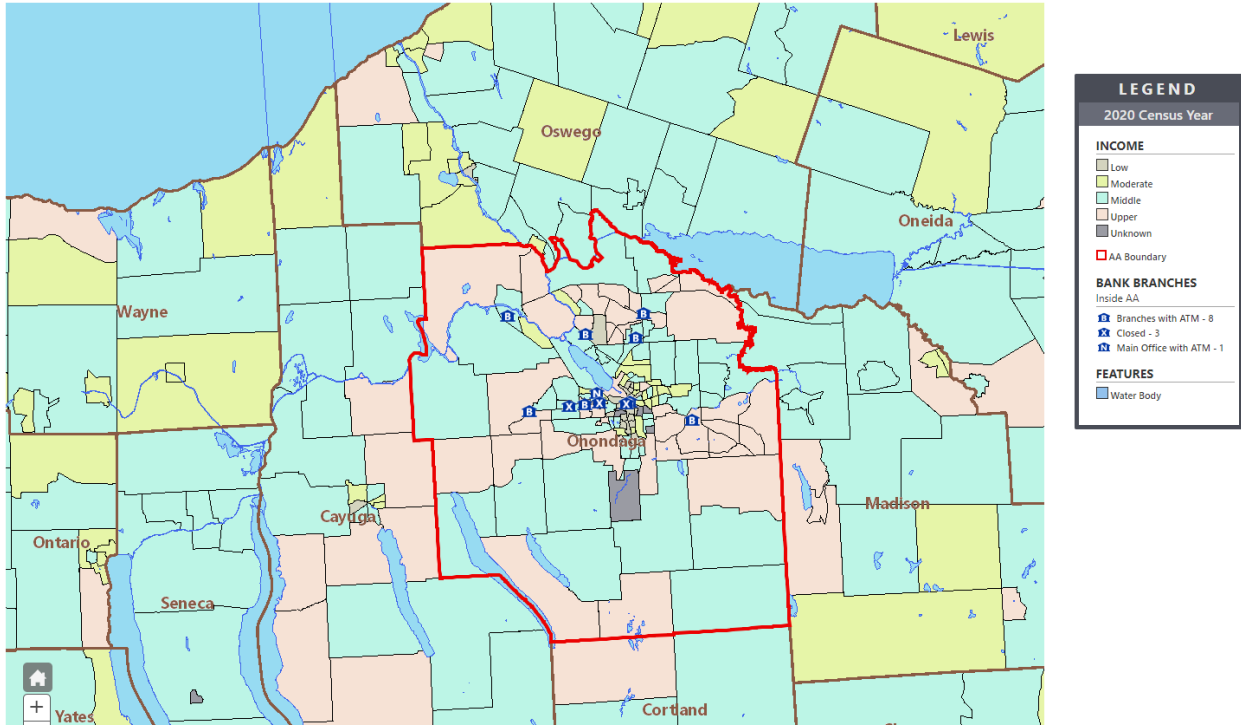
Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 45060 (Syracuse, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	85	26.2	40.5	9,731	20.7	27.0	409	54.5	34.7	18,704	18.5	20.6	88.8
Over \$1 Million	240	73.8		37,267	79.3		341	45.5		82,386	81.5		10.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.0
Total	325	100.0		46,998	100.0		750	100.0		101,090	100.0		100.0
By Loan Size													
\$100,000 or Less	201	61.8	92.1	7,458	15.9	34.6	499	66.5	82.9	16,946	16.8	25.7	
\$100,001 - \$250,000	67	20.6	4.2	13,118	27.9	17.2	160	21.3	9.3	27,550	27.3	21.1	
\$250,001 - \$1 Million	57	17.5	3.7	26,422	56.2	48.2	83	11.1	7.8	35,805	35.4	53.2	
Total	325	100.0	100.0	46,998	100.0	100.0	750	100.0	100.0	101,090	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	64	75.3		2,112	21.7		373	91.2		10,642	56.9		
\$100,001 - \$250,000	10	11.8		1,710	17.6		26	6.4		3,570	19.1		
\$250,001 - \$1 Million	11	12.9		5,909	60.7		10	2.4		4,492	24.0		
Total	85	100.0		9,731	100.0		409	100.0		18,704	100.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 45060 (Syracuse, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	470	64.3	41.5	18,114	23.7	27.1	60	28.0	48.3	6,858	17.5	31.3	88.9
Over \$1 Million	261	35.7		58,418	76.3		154	72.0		32,228	82.5		10.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.0
Total	731	100.0		76,532	100.0		214	100.0		39,086	100.0		100.0
By Loan Size													
\$100,000 or Less	531	72.6	89.1	14,924	19.5	30.8	113	52.8	93.5	4,800	12.3	38.0	
\$100,001 - \$250,000	122	16.7	6.0	21,006	27.4	20.1	36	16.8	3.4	6,206	15.9	16.0	
\$250,001 - \$1 Million	74	10.1	4.9	32,699	42.7	49.0	65	30.4	3.1	28,080	71.8	46.0	
Total	731	100.0	100.0	76,532	100.0	100.0	214	100.0	100.0	39,086	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	435	92.6		10,023	55.3		43	71.7		1,657	24.2		
\$100,001 - \$250,000	26	5.5		4,055	22.4		10	16.7		1,608	23.4		
\$250,001 - \$1 Million	9	1.9		4,036	22.3		7	11.7		3,593	52.4		
Total	470	100.0		18,114	100.0		60	100.0		6,858	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

CRA APPENDIX B
ASSESSMENT AREA MAPS

MSA 45060 (Syracuse, NY) Assessment Area



CRA APPENDIX C GLOSSARY

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

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

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

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

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

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

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

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

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and

total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

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

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

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

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

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

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

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

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

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

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

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

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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