

# **PUBLIC DISCLOSURE**

September 25, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Chemung Canal Trust Company  
RSSD No. 884303

One Chemung Canal Plaza  
Elmira, NY 14901

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: SATISFACTORY

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

### PERFORMANCE TEST RATINGS TABLE:

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

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

### SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the institution's rating follow:

#### LENDING TEST

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

- The bank made extensive use of innovative and/or flexible lending practices in serving the assessment area's credit needs.

#### INVESTMENT TEST

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

#### SERVICE TEST

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

## INSTITUTION

### DESCRIPTION OF INSTITUTION

Established in 1833, Chemung Canal Trust Company (“Chemung” or “the bank”) is a state-member, full-service commercial bank headquartered in Elmira, New York, with total assets of \$2.7 billion as of March 31, 2023.

Chemung is the lead subsidiary and wholly owned by financial holding company, Chemung Financial Corporation (“CFC”). CFC also owns the CFS Group, Inc. (founded 2001), a financial services subsidiary offering non-traditional services including mutual funds, annuities, brokerage services, tax preparation services, and insurance. Additionally, CFC established a captive insurance subsidiary, Chemung Risk Management, Inc. (“CRM”), based in the state of Nevada in May 2016. CRM insures gaps in commercial coverage and uninsured exposures in the CFC's current insurance coverage. Chemung Funding Corporation (“Funding Corporation”), a subsidiary of the bank, is a real estate investment trust. The Funding Corporation provides deposit, lending, trust, and other financial services to individuals, small- and medium-sized businesses.

Chemung is engaged in traditional banking activities, offering products such as 1-4 residential real estate secured mortgage loans, multifamily loans, home equity lines of credit (“HELOC”), consumer loans, and commercial loans. The bank’s branches are located in the southern tier of New York State, which includes its main office in Elmira, NY, the bordering counties in northern Pennsylvania, and in the Albany, NY area. All products and services are offered at each of its branches. As of December 31, 2022, Chemung operated 30 branches that contained 33 automated teller machines (“ATM”), and three off-site ATMs.

The bank’s portfolio by dollar volume primarily consists of residential real estate loans and a mix of nonfarm nonresidential secured and commercial loans. Based on the March 31, 2023, Federal Financial Institutions Examination Council (“FFIEC”) Consolidated Report of Condition and Income (“Call Report”), Chemung’s loan portfolio by dollar volume is summarized in the following table:

Loan Type	Total Loans \$(000)	Percent of Total Loans
1-4 Residential Real Estate Secured	\$377,252	20.1
Construction	\$118,660	6.3
Multifamily Dwelling	\$306,395	16.4
HELOCs	\$36,810	2.0
Consumer	\$216,818	11.6
Agriculture	\$1,358	0.1
Commercial & Industrial	\$229,962	12.3
Nonfarm Nonresidential Secured	\$568,038	30.3
Other	\$18,407	1.0
<b>Total</b>	<b>\$1,873,700</b>	<b>100.0</b>
<i>*This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers’ acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are not included in this table.</i>		

Based on the March 31, 2023, Uniform Bank Performance Report (“UBPR”), the bank’s deposit portfolio by dollar volume was a mix of demand deposits, NOW/ATS deposits, money market deposits, and other savings deposits as summarized in the following table:

<b>Deposit Type</b>	<b>Total Deposits \$(000)</b>	<b>Percent of Total Deposits</b>
Demand Deposits	\$690,596	28.0
All NOW and ATS Accounts	\$287,269	11.7
Money Market Deposit Accounts	\$635,197	25.8
Other Savings Deposits	\$271,445	11.0
Time Deposits at or below Insurance Level	\$415,007	16.8
Time Deposits Over Insurance Level	\$37,086	1.5
Brokered Deposits	\$126,777	5.1
<b>Total</b>	<b>\$2,463,377</b>	<b>100.0</b>

Chemung delineated seven assessment areas, which included all geographies in which its main office, branch offices, and deposit-taking ATMs were located. All products and services were offered throughout all its 30 branch locations. The assessment area delineations complied with the requirements of Section 228.41 of Regulation BB and did not arbitrarily exclude LMI geographies.

From 2019 through 2021, Schuyler County, located in the Non-Metropolitan New York assessment area, included five underserved census tracts, and in 2022, four tracts were designated as underserved. From 2019 through 2021, Sullivan County, located in the Non-Metropolitan Pennsylvania assessment area, included one underserved census tract, and in 2022, two tracts were designated as underserved.

In 2021, the bank opened and operated one loan production office (“LPO”) in MSA 15380 (Buffalo-Cheektowaga, NY). The LPO accepted loan payments and maintained a deposit-taking ATM. Upon opening the LPO, Chemung added a new assessment area in MSA 15380 (Buffalo-Cheektowaga, NY), which included Erie County but excluded Niagara County.

The following list details Chemung’s assessment areas and the respective scope of examination:

**Full-Scope Assessment Areas in New York State**

- MSA 21300 (Elmira, NY) assessment area:
  - Contained the entirety of the MSA 21300, which consisted of Chemung County.
- Non-Metropolitan New York State assessment area:
  - Contained the entirety of Cayuga, Cortland, Schuyler, and Seneca Counties, and the eastern portion of Steuben County.
- MSA 10580 (Albany-Schenectady-Troy, NY) assessment area:
  - Contained the entirety of Albany, Schenectady, and Saratoga Counties.

**Full-Scope Assessment Area in Pennsylvania**

- Non-Metropolitan Pennsylvania assessment area:
  - Contained the entirety of Bradford County, the eastern portion of Tioga County, and the western portion of Sullivan County.

### **Limited-Scope Assessment Areas in New York**

- MSA 13780 (Binghamton, NY) assessment area:
  - 2022: Contained the entirety of MSA 13780, which consisted of Broome and Tioga Counties.
  - 2019-2021: Contained the entirety of Tioga County and a portion of Broome County.
  
- MSA 27060 (Ithaca, NY) assessment area:
  - Contained the entirety of MSA 27060, which consisted of Tompkins County.
  
- MSA 15380 (Buffalo-Cheektowaga, NY) assessment area:
  - 2021: Contained the entirety of Erie County.

The full scope assessment areas were identified based on the significance of the bank's lending and deposit activities within these assessment areas, in comparison to the limited scope assessment areas. Also considered was the length of time since the assessment area(s) were last examined using a full scope review.

### **Previous Performance Evaluation**

At the previous CRA evaluation dated October 7, 2019, the bank was evaluated as a Large Retail Institution and received an overall "Satisfactory" CRA rating. The bank's Lending Test was rated "High Satisfactory," the Investment Test was rated "Low Satisfactory," and the Service Test was rated "High Satisfactory."



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## **SCOPE OF EXAMINATION**

### **Procedures**

Chemung's CRA performance was reviewed using the FFIEC Interagency CRA Procedures for Large Retail Financial Institutions, which consisted of the lending, investment, and service tests. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, market competition, assessment area demographics and credit and community development needs.

### **Products**

During this evaluation, loans reportable under the Home Mortgage Disclosure Act ("HMDA"), as well as small business loans, subject to CRA data reporting requirements were analyzed as these loan types represented the bank's major product lines based on a review of bank records, business strategy, and loan portfolio composition. HMDA-reportable loans included home purchase and refinance loans on 1-4 family. The small business loans included commercial real estate loans, commercial and industrial loans, and lines of credit in amounts of \$1 million or less. Home improvement loans, multifamily loans, and small farm loans were excluded from the evaluation because there was insufficient volume to conduct a meaningful analysis. Examiners verified the integrity of HMDA and small business data reported for the years 2019, 2020, 2021, and 2022. Examiners also analyzed community development loans, investments, and services. Multifamily loans qualifying as community development loans were also considered in the evaluation of community development lending.

The bank originated Small Business Administration ("SBA") Paycheck Protection Program ("PPP") loans. The SBA PPP was established by the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") of 2020, and designed to provide direct capital for small businesses adversely affected by the COVID-19 pandemic and to keep workers on small business payrolls. Pursuant to CA Letter 21-5: CRA Consideration for Activities in Response to the Coronavirus, PPP loans greater than \$1 million may be considered as community development loans, if they have a primary purpose of community development as defined under CRA. PPP loans during the review period demonstrated leadership in serving assessment area credit needs during a period of acute and immediate credit needs attributable to the COVID-19 pandemic.

### **Evaluation Period**

HMDA and small business loans originated between January 1, 2019, through December 31, 2022 were analyzed. Examiners reviewed community development loans, qualified investments, philanthropic grants, and community development services from April 1, 2019, through June 30, 2023.

### **Lending Analysis**

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

In order to analyze the borrower characteristics of home purchase and refinance lending, the proportion of originations to LMI borrowers was compared with the proportion of LMI families residing in the assessment area. Income estimates from the FFIEC were used to categorize borrower income. For the evaluation period,

median family income estimates from the FFIEC for each respective year were used to categorize borrower income levels for that year's loans. For small business lending, Chemung's percentage of loans to businesses with Gross Annual Revenues ("GAR") of \$1 million or less was compared to the percentage of all such businesses located in the assessment area, as reported by D&B. The size of the small business loans was also used as a proxy to identify lending to businesses with GARs of \$1 million or less.

HMDA and small business lending performances for 2019, 2020, 2021, and 2022 were also compared with the 2019, 2020, 2021, and 2022 aggregate performance of all lenders in Chemung's assessment areas subject to HMDA and/or CRA small business reporting.

### **Community Development Activity Analysis**

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

### **Deriving Overall Conclusions**

In deriving overall conclusions, Chemung's performance in New York State received the most weight in determining the overall rating because of the bank's high concentration of deposits, branches, and lending in this state. Chemung's performance in the New York State assessment areas accounted for 97.1% of its total deposits and 92.7% of total lending activity and 93.3% of the branches, including the main office.

In reaching a conclusion about Chemung's overall performance within an individual assessment area, products were weighted based on their volume in that area. Demographic and economic information also impacted Chemung's performance context and was discussed in detail within each full-scope assessment area. Information was obtained from publicly available sources including the 2015 American Community Survey ("2015 ACS"), the U.S. Department of Commerce's Bureau of the Census ("2020 U.S. Census"), and the U.S. Department of Labor's Bureau of Labor Statistics ("BLS"), D&B, FFIEC, and U.S. Department of Housing and Urban Development ("HUD").

The MSA 21300 (Elmira, NY) assessment area, Non-Metropolitan New York State assessment area, and the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area received the most weight when determining the bank's overall New York State rating because of the concentration of deposits, lending, population, and owner-occupied housing units in these areas. As of June 30, 2022, these three assessment areas had 82.9% of the deposits and 79.3% of the loan volume in New York State. The Commonwealth of Pennsylvania had a lesser impact on the overall performance of the institution due to the bank's limited presence.

Limited-scope reviews were conducted of the bank's performance for the MSA 13780 (Binghamton, NY) assessment area, the MSA 27060 (Ithaca, NY) assessment area, and the MSA 15380 (Buffalo-Cheektowaga, NY) assessment area.

## **Community Contacts**

Nine community contacts were conducted to gain insight on the local economic and demographic conditions and credit needs of the areas served. Examiners held discussions with two contacts in each full review assessment area, including one contact that discussed both the MSA 21300 (Elmira, NY) assessment area and the Non-Metropolitan Pennsylvania assessment area. The general credit and service needs in all geographies were affordable housing, financial literacy, workforce development, and tailored loan products. Details of the individual community contact interviews can be found in the respective full-scope assessment area evaluations.

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

### **LENDING TEST**

Chemung's overall performance in meeting the credit needs of its assessment areas is rated High Satisfactory, based on good performance in the New York assessment areas and adequate performance in the Pennsylvania assessment area.

Lending levels reflected good responsiveness to the assessment areas credit needs. A high percentage of loans were made in the bank's assessment areas. Overall, the geographic distribution of loans reflected good penetration throughout the assessment areas. The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. The bank exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses. The bank made a relatively high level of community development loans. The bank made extensive use of innovative and/or flexible lending practices in serving the assessment area's credit needs.

### **Lending Activity**

Chemung's lending levels reflected good responsiveness to the credit needs of the assessment areas, given the bank's capacity to meet assessment areas' credit needs and overall market conditions.

The bank's performance in the New York State assessment areas demonstrated good responsiveness. According to the June 30, 2022, FDIC Summary of Deposit Report, 45 institutions operated 591 offices within these assessment areas. Chemung ranked 7<sup>th</sup> with approximately \$2.3 billion in deposits, which represented 2.0% of the deposit market share. According to 2022 CRA & HMDA Market Peer Report for the New York State full-scoped assessment areas:

- MSA 10580 (Albany-Schenectady-Troy, NY): ranked 37<sup>th</sup> out of 297 HMDA reporters and 13<sup>th</sup> out of 116 CRA reporters.
- MSA 21300 (Elmira, NY): ranked 6<sup>th</sup> out of 113 HMDA reporters and 4<sup>th</sup> out of 48 CRA reporters.
- Non-Metropolitan NY: ranked 18<sup>th</sup> out of 192 HMDA reporters and 21<sup>st</sup> out of 79 CRA reporters.

The bank's performance in the Pennsylvania assessment area demonstrated adequate responsiveness. According to the June 30, 2022, FDIC Summary of Deposit Report, 7 institutions operated 43 offices within this assessment area. Chemung ranked 6<sup>th</sup> with approximately \$62.7 million in deposits, which represented 2.2% of the deposit market share. According to 2022 CRA & HMDA Market Peer Report for the full-scoped Pennsylvania assessment area, the bank ranked 15<sup>th</sup> out of 162 HMDA reporters and 11<sup>th</sup> out of 60 CRA reporters.

Chemung’s overall HMDA, Small Business and Small Farm lending concentrations are summarized in the following table:

<b>Summary of Lending Activity January 1, 2019 to December 31, 2022</b>				
<b>Loan Types</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Improvement	40	0.7	\$2,125	0.2
Home Purchase	842	15.0	\$169,174	12.6
Multifamily Housing	97	1.7	\$381,763	28.5
Refinancing	1,223	21.8	\$239,474	17.9
<b>Total HMDA</b>	<b>2,202</b>	<b>39.3</b>	<b>\$792,536</b>	<b>59.2</b>
<b>Total Small Business</b>	<b>3,366</b>	<b>59.9</b>	<b>\$543,292</b>	<b>40.4</b>
<b>Total Small Farm</b>	<b>46</b>	<b>0.8</b>	<b>\$5,206</b>	<b>0.4</b>
<b>TOTAL LOANS</b>	<b>5,614</b>	<b>100.0</b>	<b>\$1,341,034</b>	<b>100.0</b>

### Assessment Area Concentration

Chemung originated a high percentage of its loans by both dollar and number within its combined assessment areas. As shown in the subsequent table, Chemung made 4,836 HMDA, small business, and small farm loans during the evaluation period, totaling \$1.1 billion within the assessment areas. This lending activity represented an annualized total of 1,209 loans by number and \$276 million by dollar. This represented a 47.1% increase by number and a 55.1% increase by dollar in the bank’s performance from the prior evaluation where the annualized lending activity totaled 822 loans by number and \$178 million by dollar.

The bank’s significant increase in its lending activity was attributed to the origination of Small Business Administration (“SBA”) Paycheck Protection Program (“PPP”) loans. The SBA PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (“CARES Act”) of 2020 and designed to provide direct capital for small businesses adversely affected by the COVID-19 pandemic and also to keep workers on small business payrolls. Specifically, the bank originated a total of 2,095 PPP loans totaling \$181 million in the evaluation period in the amount of \$1 million or less. PPP loans provided a direct benefit to small businesses adversely affected by the COVID-19 pandemic and are considered particularly responsive to acute credit needs of small businesses.

<b>Lending Inside and Outside the Assessment Area January 1, 2019 to December 31, 2022</b>								
<b>Loan Types</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Improvement	38	95.0	\$1,821	85.7	2	5.0	\$304	14.3
Home Purchase	668	79.3	\$119,569	70.7	174	20.7	\$49,605	29.3
Multifamily Housing	77	79.4	\$318,023	83.3	20	20.6	\$63,740	16.7
Refinancing	1,025	83.8	\$187,585	78.3	198	16.2	\$51,889	21.7
<b>Total HMDA</b>	1,808	82.1	\$626,998	79.1	394	17.9	\$165,538	20.9
<b>Total Small Business</b>	2,983	88.8	\$470,869	87.0	376	11.2	\$70,076	13.0
<b>Total Small Farm</b>	45	97.8	\$5,171	99.3	1	2.2	\$35	0.7
<b>TOTAL LOANS</b>	4,836	86.2	\$1,103,038	82.4	771	13.8	\$235,649	17.6

### Geographic Distribution of Loans

Chemung’s geographic distribution of loans reflected good overall penetration throughout its assessment areas. This conclusion was based primarily on good performance in the MSA 21300 (Elmira, NY), Non-Metropolitan New York, and MSA 10580 (Albany-Schenectady-Troy, NY) assessment areas. Chemung had adequate performance in the Non-Metropolitan Pennsylvania assessment area. The analysis considered performance context factors, such as the number of LMI geographies within the assessment areas, the number of owner-occupied units, and the aggregate lending performance.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among borrowers of different income levels and businesses of different sizes. This conclusion was based primarily on good performance in both the MSA 21300 (Elmira, NY) and Non-Metropolitan New York assessment areas, and adequate performance in both the MSA 10580 (Albany-Schenectady-Troy, NY) and Non-Metropolitan Pennsylvania assessment areas.

### Community Development Lending

Chemung had a relatively high level of community development loans based primarily on the bank’s performance within New York State, which received the greatest weight in the overall rating. Additionally, examiners considered two PPP loans in amounts greater than \$1 million, totaling approximately \$2.5 million, that had a primary purpose of community development. PPP loans less than \$1 million to non-profit organizations were also considered, of which 22 were approved totaling \$5 million. Chemung’s community development lending performance was relatively high in the New York State assessment areas, while the bank made a low level of community development loans in the Pennsylvania assessment area.

As shown in the following table, the bank originated 115 qualified community development loans totaling \$69.2 million across its combined assessment areas. This lending level represented an annualized performance over 51 months of 27 loans totaling approximately \$16.3 million. Compared to the previous evaluation where the bank had an annualized performance of 33.5 loans totaling \$11.3 million, this represented an annualized performance decrease of 19.4% by number but a substantive increase of 43.7% by dollar.

The majority of the bank’s community development lending was to community services (69.6% by number, 68.1% by dollar) and was responsive to assessment area credit needs. Community contacts identified a strong need in the southern tier of New York for social services, which was reflected in Chemung’s lending in the Non-Metropolitan New York assessment area where 25.0% of community service lending was extended. Most of Chemung’s community development loans were to non-profit organizations that provided social services to LMI individuals and families.

The bank’s performance was comparable to three similarly situated banks that primarily served the same assessment areas. Specifically, the bank ranked 2<sup>nd</sup> based on annualized community development loans to deposits, 1<sup>st</sup> based on annualized community development loans to Tier 1 Capital, and 2<sup>nd</sup> based on annualized community development loans to average assets.

<b>Community Development Lending by Assessment Area</b>										
<b>April 1, 2019 – June 30, 2023</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
MSA 21300 (Elmira, NY)	2	100	33	19,286	2	3,381	9	4,243	<b>46</b>	<b>27,010</b>
Non-Metropolitan New York	2	10,374	20	16,529	4	357	3	226	<b>29</b>	<b>27,486</b>
MSA 10580 (Albany-Schenectady-Troy, NY)	0	0	20	8,967	6	763	5	2,048	<b>31</b>	<b>11,778</b>
MSA 15380 (Buffalo-Cheektowaga, NY)	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
MSA 13780 (Binghamton, NY)	0	0	6	2,043	2	536	0	0	<b>8</b>	<b>2,579</b>
MSA 27060 (Ithaca, NY)	0	0	1	300	0	0	0	0	<b>1</b>	<b>300</b>
Non-Metropolitan Pennsylvania	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
<b>Total</b>	<b>4</b>	<b>10,474</b>	<b>80</b>	<b>47,125</b>	<b>14</b>	<b>5,037</b>	<b>17</b>	<b>6,517</b>	<b>115</b>	<b>69,153</b>
<b>Percent of Total</b>	<b>3.5</b>	<b>15.1</b>	<b>69.6</b>	<b>68.1</b>	<b>12.2</b>	<b>7.3</b>	<b>14.8</b>	<b>9.4</b>	<b>100.0</b>	<b>100.0</b>

**Innovative and/or Flexible Lending Practices**

Chemung made extensive use of innovative and/or flexible lending practices in serving its assessment area’s credit needs. Chemung’s products were responsive to specific community needs in the assessment areas, as illustrated below for the variety of programs offered by the bank:

- City of Elmira First-Time Homebuyers Grant Program;
- Ithaca Neighborhood Housing Service’s Down Payment Assistance Program;
- Metro Interfaith Housing Management Corp’s Housing Assistance Program;
- Freddie Mac’s Home Possible Loan Program with a 3% down payment for first-time home buyers;
- Federal Home Loan Bank’s (“FHLB”) First Home Club;
- State of New York Mortgage Agency (“SONYMA”) loan program;
- Community Progress, FHLB’s low-cost home restoration loan program; and
- PPP Loans for COVID-19 relief for small businesses

## INVESTMENT TEST

Chemung made an adequate level of qualified community development investments and grants, and was rarely in a leadership position. The bank made occasional use of innovative and/or complex investments to support community development initiatives. The bank exhibited adequate responsiveness to credit and community development needs.

Chemung's investment test performance is rated Low Satisfactory, based on adequate performance both in the MSA 21300 (Elmira, NY) and New York Non-Metropolitan assessment areas, good performance in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area, and excellent performance in the Pennsylvania Non-Metropolitan assessment area.

During the current evaluation period, the bank made 243 qualified community development investments and grants totaling approximately \$26.4 million, which included 11 new investments totaling \$25.7 million and 232 grants totaling \$660,801. The 11 new investments were mortgage-backed securities which included loans for LMI individuals throughout the bank's assessment areas. For this evaluation period, examiners count the number of MBS purchases at the institutional level, but have detailed the allocated dollar amounts within the specific performance reviews for the corresponding assessment areas.

The total investment level represented annualized performance of 2.6 investments by number and \$6 million by dollar. Compared to the previous evaluation where the bank had an annualized performance of 16 investments totaling \$4.6 million, this represented an annualized performance decrease of 83.8% by number but an increase of 30.4% by dollar.

The level of grants represented an annualized performance of 54.6 grants by number and \$155,482 by dollar. Compared to the previous evaluation where the bank had an annualized performance of 69 grants totaling \$209,500, this represented an annualized performance decrease of 20.9% by number and 25.8% by dollar.

<b>Qualified Investments and Grants by Assessment Area</b>					
<b>April 1, 2019 - June 30, 2023</b>					
<b>Area</b>	<b>Affordable Housing</b>	<b>Community Service</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>\$(000s)</b>	<b>\$(000s)</b>	<b>\$(000s)</b>	<b>\$(000s)</b>	<b>\$(000s)</b>
MSA 21300 (Elmira, NY)	288.4	195.9	27.0	0.3	<b>511.6</b>
Non-Metropolitan New York	1,202.7	232.9	8.4	241.7	<b>1,685.7</b>
MSA 10580 (Albany-Schenectady-Troy, NY)	18,323.1	90.1	0.0	0.0	<b>18,413.2</b>
MSA 15380 (Buffalo-Cheektowaga, NY)	0.0	0.0	0.0	0.0	<b>0.0</b>
MSA 13780 (Binghamton, NY)	623.6	41.7	0.0	0.0	<b>665.3</b>
MSA 27060 (Ithaca, NY)	4,395.6	31.2	0.0	0.0	<b>4,426.8</b>
Non-Metropolitan Pennsylvania	679.9	10.7	0.0	0.0	<b>690.6</b>
<b>Total</b>	<b>25,513.3</b>	<b>602.5</b>	<b>35.4</b>	<b>242.0</b>	<b>26,393.2</b>
<b>Percent of Total</b>	<b>96.7%</b>	<b>2.3%</b>	<b>0.1%</b>	<b>0.9%</b>	<b>100%</b>

*Source: Bank Data*

The bank occasionally used innovative and/or complex investments to support community development initiatives. Ten of the bank's new investments consisted of mortgage-backed securities ("MBS") which while not considered particularly innovative and/or complex, served the credit needs of the area.

Chemung exhibited adequate responsiveness to assessment area credit and community development needs. The bank's qualified investments primarily promoted affordable housing efforts which community contacts identified as community development needs within the assessment areas. Qualified grants primarily promoted community services towards LMI individuals which were also identified community development needs within the assessment areas.

## **SERVICE TEST**

Chemung's service test performance is rated High Satisfactory based on good performance in the MSA 21300 (Elmira, NY), Non-Metropolitan New York, and MSA 10580 (Albany-Schenectady-Troy, NY) assessment areas. Delivery systems were accessible to the bank's geographies and individuals of different income levels in its assessment areas. The bank's record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced the needs of its assessment areas, particularly LMI geographies and/or LMI individuals. The bank provided a relatively high level of community development services.

### **Retail Services**

Chemung's delivery systems were accessible to the bank's geographies and individuals of differing income levels in its assessment areas. As of December 31, 2022, the bank operated a network of 30 branch locations, including its main office. Three branches were located in low-income census tracts (10.0%), five were located in moderate-income census tracts (16.7%), 17 branches were located in middle-income census tracts (56.7%), four were located in upper-income census tracts (13.3%), and one in an unknown income census tract (3.3%). The Montour Falls Branch was located in a middle-income tract designated as underserved. The bank operated 33 full-services ATMs and 3 off-site cash-only ATMs. Nine full-service ATMs were located in LMI tracts (25.0%), one offsite cash-only ATM was located in a middle-income tract and two in unknown income tracts.

Chemung's record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies or LMI individuals. The bank closed five branches and relocated one branch during the review period, each of which were in middle- or upper-income census tracts. The bank closed seven off-site cash-only ATMs of which two were located in low-income, two in middle-income, two in upper-income, and one in unknown-income census tracts. The number of branches decreased by 14.3% (five branches) since the prior evaluation. Chemung opened one LPO with a deposit-taking ATM during the evaluation period in a middle-income tract, but it did not operate this location as a branch.

The bank offered alternative delivery systems which improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

Chemung's branches and ATMs are summarized in the subsequent chart:



Branch and ATM Distribution by Tract Income Level As of December 31, 2022								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	67	10.0	201,461	8.3	3	10.0	4	11.1
Moderate	109	16.3	346,214	14.3	5	16.7	5	13.9
Middle	311	46.4	1,147,953	47.5	17	56.7	20	55.6
Upper	159	23.7	672,545	27.8	4	13.3	4	11.1
Unknown	24	3.6	48,428	2.0	1	3.3	3	8.3
<b>Total</b>	<b>670</b>	<b>100.0</b>	<b>2,416,601</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>

*Source: 2020 ACS data and Bank Records*

Services did not vary in a way that inconvenienced its assessment areas, particularly in LMI geographies or to LMI individuals. The branches had standard hours of 9am-4:30pm. Of Chemung’s 30 branches, 26 branches (86.7%) had drive-up service, seven (26.9%) of which were in LMI geographies; 11 branches had weekend hours (36.7%), three (27.3%) of which were LMI branches; and one branch (3.3%) had extended hours, which was located in an LMI area. Additionally, the bank offered the following low-cost deposit accounts at all branches:

- Free Checking – A non-interest-bearing checking account with a \$25 minimum deposit requirement to open. No minimum balance required or monthly service charge. Account offered access to a free debit card.
- *BankOn*<sup>®</sup> Checking – A certified low-cost, accessible checking account for customers needing to rebuild their credit and relationship with banking. No minimum balance required, no monthly maintenance fees, minimum \$25 to open, no overdraft or continuous overdraft fees.
- Business Checking – Checking account for small businesses with low activity. Minimum \$25 to open, 100 free transactions and an option to waive the \$10 service charge with a minimum \$500 monthly balance.
- Youth Savings – An interest-bearing, no monthly service charge account for children under 21 years of age to develop good financial habits. Account required \$1 deposit to open and a minimum of \$1 to maintain the account.

### Community Development Services

Chemung provided a relatively high level of community development services in its assessment areas. The bank conducted 400 qualified community service events, 338 of which were board activities, totaling 8,956 hours; 62 services provided either financial literacy or financial and technical expertise, totaling 739 hours. This represented an overall annualized performance of 94.1 services by number and 2,281.2 by hours. Compared to the last evaluation where the bank had an overall annualized performance of 91 services and 3,618.5 hours, this represented an annualized performance increase of 3.4% by number and decrease of 37.0% by hour. This is also notable as the bank continued to provide services during the COVID-19 pandemic, where in-person outreach was limited. The bank’s qualified community development services included board participation, technical assistance, and financial literacy.

<b>Community Development Services by Assessment Area                      April 1, 2019 – June 30, 2023</b>						
<b>Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>	<b>Percent of Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>%</b>
MSA 21300 (Elmira, NY)	11	159	15	0	<b>185</b>	<b>46.3</b>
Non-Metropolitan New York	24	44	25	0	<b>93</b>	<b>23.3</b>
MSA 10580 (Albany- Schenectady-Troy, NY)	4	35	19	0	<b>58</b>	<b>14.5</b>
MSA 15380 (Buffalo- Cheektowaga, NY)	0	0	0	0	<b>0</b>	<b>0</b>
MSA 13780 (Binghamton, NY)	0	23	19	0	<b>42</b>	<b>10.5</b>
MSA 27060 (Ithaca, NY)	0	2	0	0	<b>2</b>	<b>0.5</b>
Non-Metropolitan Pennsylvania	0	6	5	0	<b>11</b>	<b>2.8</b>
BSRA	1	8	0	0	<b>9</b>	<b>2.3</b>
<b>Total</b>	40	277	83	0	<b>400</b>	<b>100.0</b>
<b>% of Total</b>	<b>10.0</b>	<b>69.3</b>	<b>20.8</b>	<b>0.0</b>	<b>100.0</b>	

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Chemung 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 community credit needs was identified.

## STATE OF NEW YORK

### THE OVERALL CRA RATINGS IS: SATISFACTORY

*The Lending Test is rated: High Satisfactory*

*The Investment Test is rated: Low Satisfactory*

*The Service Test is rated: High Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

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

#### INVESTMENT TEST

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

#### SERVICE TEST

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

## **SCOPE OF EVALUATION**

Examiners conducted full-scope reviews of the following assessment areas in the state of New York:

- MSA 21300 (Elmira, NY), consisting of Chemung County, NY.
- Non-Metropolitan New York, consisting of Cayuga, Cortland, Schuyler, and Seneca Counties and the eastern portion of Steuben County, NY.
- MSA 10580 (Albany-Schenectady-Troy, NY), which included all of Albany, Saratoga, and Schenectady Counties.

Additionally, limited-scope reviews were conducted in the remaining New York assessment areas:

- MSA 13780 (Binghamton, NY), consisting of portions of Broome County, including the city of Binghamton, and Tioga County.
- MSA 27060 (Ithaca, NY), consisting of Tompkins County, NY.
- MSA 15380 (Buffalo-Cheektowaga, NY), which includes Erie County.

Refer to the overall Scope of Evaluation section for further details.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS**

Chemung's performance in the New York State assessment areas received the most weight in deriving the bank's overall CRA performance rating as the geographies accounted for 97.1% of the bank's total deposits, 92.7% of total lending activity, and 93.3% of the branches, including the main office.

As of June 30, 2022, the MSA 21300 (Elmira, NY), Non-Metropolitan New York, and MSA 10580 (Albany-Schenectady-Troy, NY) assessment areas maintained 82.9% of the deposits in the New York State assessment areas and 79.3% of the loan volume.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK STATE**

### **Lending Test**

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

### **Geographic Distribution**

The overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the NY State assessment areas. This conclusion was based primarily on good performance in the

MSA 21300 (Elmira, NY), Non-Metropolitan New York, and MSA 10580 (Albany-Schenectady-Troy, NY) assessment areas.

### **Borrower Distribution**

The overall borrower distribution of HMDA-related and small business loans was good. This conclusion was based on good performance in the MSA 21300 (Elmira, NY) and Non-Metropolitan New York assessment areas, and adequate performance in MSA 10580 (Albany-Schenectady-Troy, NY) assessment area.

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

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

### **Community Development Lending**

Chemung made a relatively high level of community development loans in the New York assessment areas. The bank was a leader in making community development loans in the Non-Metropolitan New York assessment area and made a relatively high level in the MSA 21300 (Elmira, NY) and MSA 10580 (Albany-Schenectady-Troy, NY) assessment areas. The bank extended 115 community development loans totaling \$69.2 million, annualized this represented a decrease of 19.4% by number but an increase of 43.7% by dollar since the prior evaluation.

### **INVESTMENT TEST**

The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors although rarely in a leadership position. The bank made occasional use of innovative and/or complex investments that supported community development initiatives. The bank exhibited adequate responsiveness to credit and community development needs.

### **SERVICE TEST**

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

## METROPOLITAN AREA MSA 21300 (ELMIRA, NY) FULL REVIEW

### DESCRIPTION OF INSTITUTION’S OPERATIONS

As of June 30, 2022, 37.3% of Chemung’s total deposits and 22.3% of HMDA-related and small business loans in New York State were held in this assessment area. Ranking 1<sup>st</sup> of six banks, Chemung’s deposit market share was 54.8%, followed by Community Bank, which held 29.2% of deposits. Other lead banks in terms of deposit market share were: Five Star Bank, M&T Bank, Tioga State Bank, and Woodforest National Bank.

Chemung operated six of its 30 branch locations (20.0%) and eight of its 36 ATMs (22.2%) in this assessment area.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

According to the 2020 U.S. Census, the population of this assessment area was 84,148. This assessment area consisted of 25 census tracts, of which 4 or 16.0% were low-income, 4 or 16.0% were moderate-income, 12 or 48.0% were middle-income, 4 or 16.0% were upper-income, and 1 or 4.0% were of unknown-income.

#### *Income Characteristics*

Based on the 2020 U.S. Census, this assessment area had 20,953 families, of which 23.3% were low-income (10.2% of which were below the poverty level), 15.7% were moderate-income, 21.8% were middle-income, and 39.1% were upper-income.

The FFIEC median family incomes for the counties comprising the MSA as of the 2020 U.S. Census were as follows:

<b>MSA 21300 (Elmira, NY)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$71,165	\$70,617	-0.8%
Chemung County, NY	\$71,165	\$70,617	-0.8%
MSA 21300 (Elmira, NY)	\$71,165	\$70,617	-0.8%
New York State	\$78,570	\$87,270	11.1%
<small>Source: 2011 – 2015 U.S. Census Bureau American Community Survey                      2016 – 2020 U.S. Census Bureau American Community Survey                      Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</small>			

***Housing Characteristics***

Based on the 2020 U.S. Census data, this assessment area had 38,983 housing units, of which 59.2% were owner-occupied, 28.9% were rental, and 11.9% were vacant. Of the total housing units, 13.8% were located in low-income census tracts, 15.0% in moderate-income census tracts, 54.1% in middle-income census tracts, and 17.1% in upper-income census tracts. In low-income census tracts, 28.2% of housing units were owner-occupied, 52.5% were rental units, and 19.3% were vacant. In moderate-income census tracts, 44.8% of housing units were owner-occupied, 44.5% were rental units, and 10.7% were vacant. The median age of housing stock in this assessment area was 65 years old, with 41.5% of the stock built before 1950. The median age of housing stock was 65 years in low-income tracts and 65 years in moderate-income tracts. The median housing value in this assessment area was \$108,884 with an affordability ratio of 50.4. The median gross rent in the assessment area was \$862 per month.

<b>MSA 21300 (Elmira, NY)</b>			
<b>Housing Characteristics</b>			
<b>Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$108,884	50.4	\$862
Chemung County, NY	\$108,884	50.4	\$862
MSA 21300 (Elmira, NY)	\$108,884	50.4	\$862
New York State	\$325,000	21.9	\$1,315
<i>Source: 2011 – 2015 U.S. Census Bureau American Community Survey                  2016 – 2020 U.S. Census Bureau American Community Survey</i>			

***Housing Cost Burden***

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD’s Comprehensive Housing Affordability Strategy data, within the assessment area, 44.6% of all rental households had rental costs that exceeded 30.0% of their incomes, 74.7% of low-income rental households had rental costs that exceeded 30.0% of their income, and 39.2% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD’s data, within this assessment area, 15.6% of homeowners had housing costs that exceeded 30.0% of their incomes, 63.0% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 23.6% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the “Housing Cost Burden” table below for more details.

<b>MSA 21300 (Elmira, NY) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	74.7%	39.2%	44.6%	63.0%	23.6%	15.6%
Chemung County, NY	74.7%	39.2%	44.6%	63.0%	23.6%	15.6%
MSA 21300 (Elmira, NY)	74.7%	39.2%	44.6%	63.0%	23.6%	15.6%
New York State	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

*\*Cost Burden is housing cost that equals 30.0% or more of household income  
Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy*

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

According to D&B data, there were 2,537 businesses operating in this assessment area in 2022, of which 19.4% were in low-income census tracts and 19.6% were in moderate-income tracts. Of the total businesses operating in the assessment area, 88.7% were small businesses with a GAR of \$1 million or less, of which 18.4% were in low-income census tracts and 18.8% were in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.0% in 2019, increased to 8.4% in 2020, and decreased to 5.3% in 2021. New York State had an unemployment rate of 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021. The COVID-19 pandemic contributed to the high unemployment rates in 2020 and 2021, within the assessment area and in New York State. Additional unemployment rates are provided in the subsequent table.

<b>MSA 21300 (Elmira, NY) Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.0%	8.4%	5.3%
Chemung County, NY	4.0%	8.4%	5.3%
MSA 21300 (Elmira, NY)	4.0%	8.4%	5.3%
New York State	3.8%	9.9%	6.9%

*Source: BLS, Local Area Unemployment Statistics*

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



<b>MSA 21300 (Elmira, NY)</b>								
<b>Assessment Area Demographics Table</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	16.0	2,137	10.2	643	30.1	4,892	23.3
Moderate-income	4	16.0	2,953	14.1	495	16.8	3,292	15.7
Middle-income	12	48.0	11,630	55.5	893	7.7	4,573	21.8
Upper-income	4	16.0	4,233	20.2	113	2.7	8,196	39.1
Unknown-income	1	4.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>25</b>	<b>100.0</b>	<b>20,953</b>	<b>100.0</b>	<b>2,144</b>	<b>10.2</b>	<b>20,953</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	5,388	1,519	6.6	28.2	2,830	52.5	1,039	19.3
Moderate-income	5,839	2,618	11.3	44.8	2,596	44.5	625	10.7
Middle-income	21,073	13,914	60.3	66.0	4,552	21.6	2,607	12.4
Upper-income	6,683	5,018	21.8	75.1	1,281	19.2	384	5.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>38,983</b>	<b>23,069</b>	<b>100.0</b>	<b>59.2</b>	<b>11,259</b>	<b>28.9</b>	<b>4,655</b>	<b>11.9</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	491	19.4	414	18.4	73	29.7	4	9.8
Moderate-income	498	19.6	424	18.8	65	26.4	9	22.0
Middle-income	1,026	40.4	947	42.1	59	24.0	20	48.8
Upper-income	521	20.5	465	20.7	48	19.5	8	19.5
Unknown-income	1	0.0	0	0.0	1	0.4	0	0.0
<b>Total Assessment Area</b>	<b>2,537</b>	<b>100.0</b>	<b>2,250</b>	<b>100.0</b>	<b>246</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>
			<b>Percentage of Total Businesses:</b>	<b>88.7</b>		<b>9.7</b>		<b>1.6</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2	3.3	1	1.7	1	100.0	0	0.0
Moderate-income	2	3.3	2	3.4	0	0.0	0	0.0
Middle-income	52	85.2	51	86.4	0	0.0	1	100.0
Upper-income	5	8.2	5	8.5	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>61</b>	<b>100.0</b>	<b>59</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
			<b>Percentage of Total Farms:</b>	<b>96.7</b>		<b>1.6</b>		<b>1.6</b>

Source: 2022 FFIEC Census Data and 2022 D&B Information

### ***Community Contacts***

Examiners conducted community contact interviews with two community organizations that serve the MSA 21300 (Elmira, NY) assessment area:

Examiners interviewed an executive director of an affordable housing nonprofit. The organization assists families within 60-80% area median income to achieve home ownership. The community contact indicated that the needs of the community include financial education, a system to aggregate the borrower information from various online lending platforms, affordable housing, and special mortgage loan programs.

Examiners interviewed an executive director of a housing services organization whose primary purpose is to expand the housing opportunities for low- and moderate-income residents by repairing homes. The contact shared affordable housing was a major need in the community. The organization needed to find lenders who would do 30-year fixed rate first mortgages on manufactured housing.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Chemung's lending activity reflected good responsiveness to this assessment area's credit needs. The bank's geographic distribution of loans reflected good penetration throughout the assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among individuals of different income levels and businesses of different sizes. The bank exhibited a good record of serving low-income individuals and areas and very small businesses. In addition, the bank made a relatively high level of community development loans and made extensive use of innovative and flexible lending practices in serving assessment area credit needs.

#### **Lending Activity**

Chemung's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. Chemung's market share of deposits remained stable during the evaluation period. For HMDA lending, home purchase lending increased while refinance lending remained relatively steady. The bank's overall small business lending market share also remained relatively steady, with a slight increase in 2020 and 2021, which was largely attributed to the origination of PPP loans.

In 2022, the bank ranked 1<sup>st</sup> out of six institutions with a deposit market share of 54.8%. In total HMDA lending, the bank ranked 6<sup>th</sup> out of 113 reporters with a market share of 4.3%, including market shares of 4.0% in home purchase lending and 7.1% in refinance. Chemung ranked 4<sup>th</sup> out of 48 reporters with a market share of 6.5% in small business lending. Chemung's market share of deposits and HMDA lending in 2022 was consistent with that in 2019 through 2021.

Chemung's HMDA and small business lending in this assessment areas is summarized in the following table:

<b>MSA 21300 (Elmira, NY)                      Summary of Lending Activity                      January 1, 2019 to December 31, 2022</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	6	1.6	275	0.5
Home Purchase	185	48.2	22,434	37.5
Multifamily Housing	6	1.6	14,991	25.1
Refinancing	187	48.7	22,086	36.9
<b>Total HMDA</b>	<b>384</b>	<b>36.7</b>	<b>59,786</b>	<b>35.8</b>
<b>Small Business</b>	<b>658</b>	<b>63.0</b>	<b>106,932</b>	<b>64.1</b>
<b>Small Farm</b>	<b>3</b>	<b>0.3</b>	<b>51</b>	<b>0.0</b>
<b>TOTAL LOANS</b>	<b>1,045</b>	<b>100.0</b>	<b>166,769</b>	<b>100.0</b>

### **Geographic Distribution of Loans**

Chemung’s overall geographic distribution of HMDA and small business loans reflected good penetration throughout the MSA 21300 (Elmira, NY) assessment area. Lending penetration in LMI tracts was adequate for home purchase, good for refinance, and excellent for small business.

### ***Gap Analysis***

Chemung demonstrated an excellent level of dispersion in LMI census tracts in this assessment area. The bank’s performance in LMI census tracts remained strong throughout the years with 100% penetration in LMI tracts. The subsequent table is a summary of the analysis of lending gaps in this assessment area.

<b>MSA 21300 (Elmira, NY)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 – December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	4	0	100.0%
Moderate	3	0	100.0%
Middle	11	1	90.9%
Upper	3	0	100.0%
Income Unknown	1	1	0%
<b>2020</b>			
Low	4	0	100.0%
Moderate	3	0	100.0%
Middle	11	0	100.0%
Upper	3	0	100.0%
Income Unknown	1	1	0%
<b>2021</b>			
Low	4	0	100.0%
Moderate	3	0	100.0%
Middle	11	0	100.0%
Upper	3	0	100.0%
Income Unknown	1	1	0%
<b>2022</b>			
Low	4	0	100.0%
Moderate	4	0	100.0%
Middle	12	0	100.0%
Upper	4	0	100.0%
Income Unknown	1	1	0%

*Home Purchase Loans*

Chemung’s overall geographic distribution of home purchase loans reflected adequate penetration throughout this assessment area based on excellent performance in low-income geographies and poor performance in moderate-income geographies when compared to the assessment area demographic and to the aggregate lending.

In 2022, the bank made 8.9% of home purchase loans by number and 6.3% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was above the 6.6% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which made 5.7% by number and 3.0% by dollar in low-income census tracts. From 2019 through 2021, Chemung’s performance was similar to 2022 as the bank also exceeded both the demographic and aggregate’s performance in low-income census tracts.

In 2022, the bank made 8.9% of home purchase loans by number and 6.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the 11.3% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 13.4% by number and 10.3% by dollar of home purchase loans in moderate-income census tracts. Performance in 2021 was similar to 2022. The bank's performance in 2019 was substantially below that in 2022 and in 2020, as the bank made no home purchase loans in moderate-income census tracts.

### *Refinance Loans*

Chemung's performance in refinance lending was good overall based on good performance in both low-income and moderate-income geographies.

In 2022, the bank made 7.7% by number and 17.9% by dollar of refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was slightly above the 6.6% of owner-occupied housing units located in low-income census tracts and slightly above the aggregate, which made 7.1% by number and 6.2% by dollar of refinance loans in low-income census tracts. In 2021, Chemung originated only one refinance loan in a low-income census tract, and in 2020, made no loans in a low-income census tract. In 2019, Chemung's performance was similar to 2022.

In 2022, the bank made 19.2% by number and 10.5% by dollar of refinance loans in moderate-income census tracts. Chemung's refinance lending performance in moderate-income census tracts was significantly above the 11.3% of owner-occupied housing units located in moderate-income census tracts and significantly above the aggregate, which made 12.8% by number and 8.6% by dollar of refinance loans in moderate-income census tracts. Chemung's performance in 2020 and 2021 was below that in 2022; however, the bank still exceeded the assessment area demographic in each year. In 2019, the bank made no refinance loans in low-income census tracts.

### *Small Business Loans*

Chemung's small business performance was excellent overall based on excellent performance in both low-income and moderate-income geographies.

In 2022, the bank made 18.6% by number and 18.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was similar to the 19.4% of businesses located in low-income census tracts and above the aggregate, which made 14.1% by number and 17.5% by dollar of small business loans in low-income census tracts. Chemung's performance from 2019 through 2021 exceeded 2022 activity and significantly exceeded both the assessment area demographic and the lending aggregate.

In 2022, the bank made 30.0% by number and 27.1% by dollar of small business loans in moderate-income census tracts. Chemung's small business lending performance in moderate-income census tracts was significantly above the 19.6% of businesses located in moderate-income census tracts and significantly above the aggregate, which made 19.6% by number and 24.8% by dollar of small business loans in moderate-income census tracts. Chemung's performance from 2019 through 2021 was below that in 2022; however, the bank still exceeded both the assessment area demographic and the lending aggregate.

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

Chemung's overall distribution of HMDA and small business lending was, given the product lines offered, good among customers of different income levels and businesses of different sizes. This conclusion was based

on adequate distribution of HMDA loans to low-income borrowers, good distribution of HMDA loans to moderate-income borrowers, and adequate distribution of loans to businesses with GAR of \$1 million or less.

#### *Home Purchase Loans*

Chemung's overall distribution of home purchase loans to borrowers of different income levels was excellent based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers.

In 2022, the bank made 20.0% by number and 12.0% by dollar to low-income borrowers and was below the 23.3% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 11.8% by number and 6.9% by dollar to low-income families. Chemung's performance to low-income borrowers compared to aggregate lending steadily improved over the evaluation period. In 2019, the bank's performance fell short of the assessment area demographic and was slightly below aggregate lending; however, in 2020 and 2021, the bank's performance increased to be on par with aggregate lending.

In 2022, the bank's lending to moderate-income borrowers was 26.7% by number and 25.7% by dollar, which was slightly above the aggregate performance of 25.3% by number, above 20.3% by dollar, and significantly above the 15.7% of moderate-income families in the assessment area. Home purchase lending to moderate-income borrowers in 2019, 2020, and 2021 was similar to the bank's performance in 2022.

#### *Refinance Loans*

Chemung's overall distribution of refinance loans to borrowers of different income levels was good based on adequate distribution to low-income borrowers and good distribution to moderate-income borrowers.

In 2022, the bank made 11.5% by number and 3.1% by dollar to low-income borrowers, which was above the aggregate lending data, at 9.0% by number and 5.6% by dollar. The bank's performance was below the 23.3% of low-income families in the assessment area. Chemung's performance was below both the assessment area demographic and lending aggregate from 2019 through 2021.

In 2022, lending to moderate-income borrowers was excellent as the bank made 23.1% by number and 17.7% by dollar to moderate-income borrowers, being similar to the aggregate lending data at 23.4% by number, similar to 18.5% by dollar, and above the 15.7% of moderate-income families in the assessment area. In 2020 and 2021, while the bank's performance was similar to aggregate lending, it fell below the assessment area demographic. In 2019, performance was comparable to that in 2022.

#### *Small Business Loans*

The overall level of lending to small businesses was adequate-based on similar performance compared to aggregate lending for 2021 and 2020.

In 2022, the bank originated 35.7% of loans by number and 19.0% by dollar to businesses with GARs of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 52.8% by number and 26.6% by dollar, in addition to being significantly below the 88.7% of businesses in the assessment area with GARs of \$1 million or less. The bank originated 35.7% of loans by number to assessment area businesses in amounts of \$100,000 or less, which were typically considered more responsive to the credit needs of very small businesses. Chemung's small business lending performance in 2019, 2020, and 2021 was comparable to its performance in 2022.

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

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

**Community Development Lending**

Chemung’s level of community development lending was relatively high in the MSA 21300 (Elmira, NY) assessment area, which represented 40.0% of the bank’s total community development lending across all assessment areas.

The bank made three PPP loans in amounts greater than \$1 million, totaling approximately \$4.8 million, which had a primary purpose of community development. Eight PPP loans in amounts of \$1 million or less to nonprofits were also qualified totaling approximately \$2.8 million. These loans were made to organizations that provided community development services for LMI.

As shown in the subsequent table, the bank originated 46 qualified community development loans totaling \$27.0 million across this assessment area. This lending level represented an annualized performance of 10.8 loans totaling approximately \$6.4 million. Compared to the previous evaluation where the bank had an annualized performance of 15.5 loans totaling \$5.5 million, this represented an annualized performance decrease of 30.3% by number and increase of 16.4% by dollar.

Chemung’s community development loans primarily helped to finance community service efforts, consistent with the needs identified by community contacts. The subsequent table illustrates the community development lending activity by year and purpose.

<b>MSA 21300 (Elmira, NY) Community Development Lending April 1, 2019 – June 30, 2023</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	0	0	9	4,525	0	0	0	0	9	4,525
2020	1	50	5	3,500	2	3,381	5	1,862	13	8,793
2021	0	0	7	5,325	0	0	4	2,381	11	7,706
2022	0	0	9	5,136	0	0	0	0	9	5,136
2023	1	50	3	800	0	0	0	0	4	850
<b>Total</b>	<b>2</b>	<b>100</b>	<b>33</b>	<b>19,286</b>	<b>2</b>	<b>3,381</b>	<b>9</b>	<b>4,243</b>	<b>46</b>	<b>27,010</b>
<b>% of Total</b>	<b>4.3</b>	<b>0.4</b>	<b>71.7</b>	<b>71.4</b>	<b>4.3</b>	<b>12.5</b>	<b>19.6</b>	<b>15.7</b>	<b>100.0</b>	<b>100.0</b>

The following are examples of community development loans in this assessment area:

- In 2019, the bank provided a \$500 thousand renewal loan for working capital to a local nonprofit. The organization was heavily involved in the community and provided several social services, including emergency housing and food pantries.

- In 2021, the bank provided a \$500 thousand secured line of credit to a local nonprofit. The organization offered multiple services to help individuals and families in the community earn livable wages and achieve financial stability with financial education and workforce development.
- In 2022, the bank provided a \$361 thousand construction loan to a local nonprofit to renovate the facility and add a community room, storage, and workspace. The organization offered meals and socialization to at-risk LMI elderly individuals in the community who are otherwise unable to cook for themselves.
- In 2023, the bank provided a \$50 thousand unsecured line of credit to a local housing nonprofit. The organization offered affordable homes to LMI individuals and families.

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

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

### **INVESTMENT TEST**

Chemung's performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. The bank made occasional use of innovative and/or complex investments to support community development initiatives. The bank exhibited adequate responsiveness to credit and community development needs.

### **Investment and Grant Activity**

The bank made an adequate level of qualified community development investments and grants. Of the bank's overall mortgage-backed securities purchases made during this evaluation period, Chemung allocated \$286.9 thousand and made 72 grants totaling \$224.7 thousand in this assessment area. Combined, this totaled \$511.6 thousand by dollar. Annualized this represents \$120.4 thousand by dollar. Compared to prior evaluations annualized investments and grants of \$386.5 thousand by dollar, this reflected a decrease of 68.8% by dollar amount.

The subsequent table details the institution's qualified grants by year and purpose. Investment allocations were excluded.



<b>MSA 21300 (Elmira, NY) Qualified Grants April 1, 2019 – June 30, 2023</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	1	0.5	12	26.5	0	0	1	0.3	<b>14</b>	<b>27.3</b>
2020	0	0	13	56.5	1	0.5	0	0	<b>14</b>	<b>57.0</b>
2021	1	0.5	11	35.5	1	1	0	0	<b>13</b>	<b>37.0</b>
2022	1	0.5	12	69.8	11	25.5	0	0	<b>24</b>	<b>95.8</b>
2023	0	0	7	7.6	0	0	0	0	<b>7</b>	<b>7.6</b>
<b>Total</b>	<b>3</b>	<b>1.5</b>	<b>55</b>	<b>195.9</b>	<b>13</b>	<b>27.0</b>	<b>1</b>	<b>0.3</b>	<b>72</b>	<b>224.7</b>
<b>% of Total</b>	<b>4.2</b>	<b>0.7</b>	<b>76.4</b>	<b>87.1</b>	<b>18.1</b>	<b>12.0</b>	<b>1.4</b>	<b>0.1</b>	<b>100.0</b>	<b>100.0</b>

The following are examples of community development investments and grants that benefited this assessment area.

- In 2020 and 2021, the bank invested \$286.9 thousand in a mortgage-backed securities pools that supported the purchase of single-family homes and condos for LMI borrowers in this assessment area.
- From 2019 to 2023, the bank provided 11 grants totaling \$22.2 thousand to a nonprofit whose mission was to reduce poverty, promote self-sufficiency, and advocate for social justice. The organization provided a variety of social services to LMI individuals and families.
- In 2019, 2021, and 2022 the bank provided three grants totaling \$1,500 to an organization that provided affordable housing for LMI individuals and families.

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

Chemung exhibited adequate responsiveness to assessment area credit and community development needs. The bank’s new qualified investments were focused on affordable housing which was a community development need within this assessment area.

### **Community Development Initiatives**

The bank made occasional use innovative and/or complex investments to support community development initiatives. New investments consisted of mortgage-backed securities.

### **SERVICE TEST**

Delivery systems were accessible to the bank’s geographies and individuals of different income levels in this assessment area. The bank’s record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced this assessment area, particularly LMI geographies and/or LMI individuals. The bank provided a relatively high level of community development services.

### Retail Services

Delivery systems were accessible to the bank’s geographies and individuals of different income levels in this assessment area. Chemung maintained six full-service branches and eight ATMs. Two branches (33.3%) and three ATMs (37.5%) were located in LMI geographies. The subsequent table details the distribution of the bank’s branch offices and ATM network by census tract income classification.

MSA 21300 (Elmira, NY) Branch and ATM Distribution by Geography Income Level As of December 31, 2022								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	4	16.0	10,676	12.7	1	16.7	2	25.0
Moderate	4	16.0	11,277	13.4	1	16.7	1	12.5
Middle	12	48.0	44,855	53.3	3	50.0	4	50.0
Upper	4	16.0	15,869	18.9	1	16.7	1	12.5
NA	1	4.0	1,471	1.8	0	0	0	0
<b>Total</b>	<b>25</b>	<b>100.00</b>	<b>84,148</b>	<b>100.00</b>	<b>6</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>

*Source: 2020 ACS data and Bank Records*

In addition to the physical access to branches and ATMs, the bank offered other alternative delivery systems in this assessment areas that improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

To the extent changes have been made, the bank’s opening and closing of branches did not adversely affect the accessibility of delivery systems, particularly in low- and moderate- income census tracts. During the evaluation period, Chemung did not open any new branch offices; however, the bank closed one branch located in an upper-income tract and three off-site ATMs, one located in low-income tract, one in middle-income tract and one in upper-income tract. The bank closed the one off-site ATM in a low-income census tract based on low utilization.

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. Chemung’s service hours were generally similar throughout this assessment area. All branch drive-thru and branch lobby hours were open Monday through Friday from 9:00 a.m. to 4:30 p.m. The bank also offered Saturday hours from 10:00 a.m. to 12:00 p.m. at three locations, one of which was in a moderate-income census tract.

The bank’s products and services in this assessment area, including the low-cost savings and checking accounts, were consistent with those discussed at the institution level.

### Community Development Services

Chemung provided a relatively high level of community development services in the assessment area. The bank provided 185 services, totaling 4,669 hours, during the evaluation period that primarily addressed community services, which accounted for 85.9% of the bank’s total community development services activity. On an annualized basis, this represented an increase as the bank made 43.5 community development services, compared to the previous year’s annualized performance of 13.5 community development services.

The subsequent table summarizes the bank’s community development services by year and purpose.

<b>MSA 21300 (Elmira, NY)</b>					
<b>Community Development Services</b>					
<b>April 1, 2019 – June 30, 2023</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2019	3	34	4	0	<b>41</b>
2020	1	23	2	0	<b>26</b>
2021	5	65	3	0	<b>73</b>
2022	2	37	6	0	<b>45</b>
2023	0	0	0	0	<b>0</b>
<b>Total</b>	<b>11</b>	<b>159</b>	<b>15</b>	<b>0</b>	<b>185</b>
<b>% of Total</b>	<b>5.9</b>	<b>85.9</b>	<b>8.1</b>	<b>0</b>	<b>100.0</b>

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

- In 2019, 2020, 2021, and 2022, three bank staff served as board members and two provided technical expertise at a nonprofit organization that provided financial literacy trainings to LMI students.
- In 2019, 2020, 2021, and 2022, two bank employees served on the board of directors for organizations that provided childcare assistance program based on income guidelines and case worker referral.
- In 2019, 2020, 2021 and 2022, an employee served on the board of directors for a nonprofit organization that provided food for LMI individuals and families.

## **NON-METROPOLITAN NEW YORK FULL REVIEW**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

As of June 30, 2022, 23.5% of Chemung's total deposits and 19.2% of HMDA-related and small business loans in New York State were held in this assessment area. With a deposit market share of 10.3%, Chemung ranked 4<sup>th</sup> of 17 depository institutions, the first being Community Bank, which held 18.3% of deposits. Other lead banks in terms of deposit market share were Five Star Bank and KeyBank.

Chemung operated 8 of its 30 branch locations (26.7%) and 8 of its 36 ATMs (22.2%) in this assessment area.

### **PERFORMANCE CONTEXT**

#### *Demographic Characteristics*

The Non-Metropolitan New York assessment area included Cayuga County, Cortland County, Schuyler County, Seneca County, and a portion of Steuben County, NY. According to the 2020 U.S. Census, the population of this assessment area was 232,162. The assessment area consisted of 73 census tracts, of which one or 1.4% was low-income, nine or 12.3% were moderate-income, 45 or 61.6% were middle-income, 16 or 21.9% were upper-income, and two or 2.7% were of unknown-income.

#### *Income Characteristics*

Based on the 2020 U.S. Census, the Non-Metropolitan New York assessment area had 59,446 families, of which 18.6% were low-income (7.7% of which were below the poverty level), 17.5% were moderate-income, 20.9% were middle-income, and 43.1% were upper-income.

The FFIEC median family incomes for the counties comprising the MSA as of the 2020 U.S. Census were as follows:

<b>Non-Metropolitan New York Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment area	\$67,285	\$70,238	4.4
Cayuga County, NY	\$69,891	\$73,590	5.3
Cortland County, NY	\$71,038	\$71,430	0.6
Schuyler County, NY	\$66,817	\$69,650	4.2
Seneca County, NY	\$69,898	\$70,915	1.5
Steuben County, NY	\$62,832	\$68,744	9.4
Non-Metropolitan New York	\$65,085	\$69,021	6.1
New York State	\$78,570	\$87,270	11.1
<i>Source: 2011 – 2015 U.S. Census Bureau American Community Survey 2016 – 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### ***Housing Characteristics***

Based on the 2020 U.S. Census data, the Non-Metropolitan New York assessment area had 113,691 housing units, of which 59.5% were owner-occupied, 24.1% were rental, and 16.4% were vacant. Of the total housing units, 1.4% were located in low-income census tracts, 13.3% in moderate-income census tracts, 64.3% in middle-income census tracts, and 21.1% in upper-income census tracts. In low-income census tracts, 17.2% of housing units were owner-occupied, 69.9% were rental units, and 12.9% were vacant. In moderate-income census tracts, 42.7% of housing units were owner-occupied, 41.5% were rental units, and 15.8% were vacant.

The median age of housing stock in this assessment area was 61 years old, with 41.3% of the stock built before 1950. The median age of housing stock was 61 years in low-income tracts and 61 years in moderate-income tracts. According to the 2020 U.S. Census, the median housing value in this assessment area was \$122,836 with an affordability ratio of 46.6. The median gross rent in the assessment area was \$773 per month.

<b>Non-Metropolitan New York Housing Characteristics</b>			
<b>Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$122,836	46.6	\$773
Cayuga County, NY	\$131,700	44.0	\$769
Cortland County, NY	\$126,700	46.7	\$787
Schuyler County, NY	\$127,000	42.0	\$765
Seneca County, NY	\$107,500	51.0	\$786
Steuben County, NY	\$104,200	53.1	\$714
Non-Metropolitan New York	\$122,281	44.0	\$755
New York State	\$325,000	21.9	\$1,315
<i>Source: 2011 – 2015 U.S. Census Bureau American Community Survey 2016 – 2020 U.S. Census Bureau American Community Survey</i>			

***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 Comprehensive Housing Affordability Strategy data, within the assessment area, 38.0% of all rental households had rental costs that exceeded 30.0% of their incomes, 69.0% of low-income rental households had rental costs that exceeded 30.0% of their income, and 23.5% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD’s data, within this assessment area, 16.8% of homeowners had housing costs that exceeded 30.0% of their incomes, 59.0% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 24.7% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the “Housing Cost Burden” table below for more details.

<b>Non-Metropolitan New York Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	69.0%	23.5%	38.0%	59.0%	24.7%	16.8%
Cayuga County, NY	72.5%	20.2%	38.4%	64.3%	28.2%	17.9%
Cortland County, NY	75.5%	25.5%	40.3%	62.3%	28.1%	15.7%
Schuyler County, NY	65.9%	27.3%	37.2%	59.9%	19.2%	18.0%
Seneca County, NY	74.5%	26.2%	40.3%	64.5%	23.8%	17.5%
Steuben County, NY	62.1%	23.7%	35.8%	52.5%	22.0%	15.9%
Non-MSA New York	71.6%	26.6%	41.4%	59.7%	26.5%	18.2%
New York State	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

\*Cost Burden is housing cost that equals 30% or more of household income  
 Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy

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

According to D&B data, there were 7,619 businesses operating in this assessment area in 2022, of which 2.4% were located in low-income census tracts and 14.5% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 89.3% were small businesses with GARs of \$1 million or less, of which 2.4% were located in low-income census tracts and 14.5% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.3% in 2019, increased to 7.8% in 2020, and decreased to 4.9% in 2021. New York State had an unemployment rate of 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021. The COVID-19 pandemic contributed to the high unemployment rates in 2020 and 2021, within the assessment area and in New York State. Additional unemployment rates are provided in the subsequent table.

<b>Non-Metropolitan New York Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.3%	7.8%	4.9%
Cayuga County, NY	4.1%	7.6%	4.7%
Cortland County, NY	4.7%	7.7%	5.1%
Schuyler County, NY	4.4%	8.3%	4.9%
Seneca County, NY	3.7%	7.8%	4.7%
Steuben County, NY	4.4%	7.9%	5.0%
Non-MSA New York	4.4%	7.8%	4.9%
New York State	3.8%	9.9%	6.9%

*Source: BLS, Local Area Unemployment Statistics*

Additional demographic data for this assessment area is provided in the subsequent Table:

Non-Metropolitan New York Assessment Area Assessment Area Demographics Table								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.4	415	0.7	123	29.6	11,036	18.6
Moderate-income	9	12.3	6,924	11.6	958	13.8	10,382	17.5
Middle-income	45	61.6	37,947	63.8	2,890	7.6	12,410	20.9
Upper-income	16	21.9	14,160	23.8	591	4.2	25,618	43.1
Unknown-income	2	2.7	0	0.0	0	0.0	0	0.0
<b>Total assessment area</b>	<b>73</b>	<b>100.0</b>	<b>59,446</b>	<b>100.0</b>	<b>4,562</b>	<b>7.7</b>	<b>59,446</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	1,602	276	0.4	17.2	1,119	69.9	207	12.9
Moderate-income	15,100	6,446	9.5	42.7	6,270	41.5	2,384	15.8
Middle-income	73,081	44,381	65.6	60.7	15,697	21.5	13,003	17.8
Upper-income	23,908	16,580	24.5	69.3	4,294	18.0	3,034	12.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total assessment area</b>	<b>113,691</b>	<b>67,683</b>	<b>100.0</b>	<b>59.5</b>	<b>27,380</b>	<b>24.1</b>	<b>18,628</b>	<b>16.4</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	186	2.4	162	2.4	24	4.0	0	0.0
Moderate-income	1,106	14.5	984	14.5	105	17.5	17	7.8
Middle-income	4,538	59.6	4,068	59.8	317	52.8	153	69.9
Upper-income	1,789	23.5	1,586	23.3	154	25.7	49	22.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total assessment area</b>	<b>7,619</b>	<b>100.0</b>	<b>6,800</b>	<b>100.0</b>	<b>600</b>	<b>100.0</b>	<b>219</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>		<b>89.3</b>		<b>7.9</b>		<b>2.9</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
#		%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	13	2.0	13	2.1	0	0.0	0	0.0
Middle-income	503	78.3	487	79.4	13	50.0	3	100.0
Upper-income	126	19.6	113	18.4	13	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total assessment area</b>	<b>642</b>	<b>100.0</b>	<b>613</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>		<b>95.5</b>		<b>4.0</b>		<b>.5</b>		

Source: 2022 FFIEC Census Data and 2022 D&B Information



### ***Community Contacts***

Examiners conducted community contact interviews with two community organizations that served the Non-Metropolitan New York assessment area.

An interview was conducted with the executive director of an organization dedicated to revitalizing rural New York State by supporting housing and community development providers. The needs of identified during the interview were: affordable housing, broadband, skilled workers, employment, and healthcare. The contact indicated that it is hard to attract interest and investment for affordable housing for the widely available land in rural areas. Additionally, during the COVID-19 pandemic, children were unable to attend school via internet because rural areas did not have broadband service available.

Another interview was conducted with the executive director of a nonprofit that provided grants to rehabilitate homes in LMI areas. The organization also offered other services, including down payment and closing cost assistance loans to first-time homebuyers. The contact identified the need for affordable housing in this area. Additionally, the organization identified the need for lenders who will provide 30-year fixed rate first mortgages for manufactured housing.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's lending activity reflected good responsiveness to the assessment area's credit needs. The bank's geographic distribution of loans reflected good penetration throughout the assessment area. The distribution of borrowers reflected, given the product lines offered, good penetration among individuals of different income levels and businesses of different sizes. The bank exhibited a good record of serving low-income individuals and areas and very small businesses. In addition, the bank was a leader in making community development loans and made extensive use of innovative and flexible lending practices in serving assessment area credit needs.

#### **Lending Activity**

Chemung's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. Chemung's market share of deposits remained stable during the evaluation period as did the bank's HMDA lending. The bank's overall small business lending market share also remained relatively steady with a slight increase in 2020 and 2021 which was largely attributed to the origination of PPP loans.

In 2022, the bank ranked 4<sup>th</sup> out of 17 institutions with a deposit market share of 10.3%. In total HMDA lending, the bank ranked 18<sup>th</sup> out of 192 reporters with a market share of 1.8%, including market shares of 1.4% in home purchase lending and 3.5% in refinance. Chemung ranked 21<sup>st</sup> out of 79 reporters with a market share of 1.2% in small business lending. Chemung's market share of deposits and HMDA lending in 2022 was consistent with that in 2019 through 2021. The bank's 2022 small business lending was consistent with 2019 but showed an increase in 2020 and 2021, which was attributed to PPP lending.

Chemung's HMDA and small business lending in this assessment areas is summarized in the following table:

<b>Non-Metropolitan New York            Summary of Lending Activity            January 1, 2019 to December 31, 2022</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	12	2.8	423	0.5
Home Purchase	172	39.7	26,235	34.0
Multifamily Housing	6	1.4	16,500	21.4
Refinancing	243	56.1	34,021	44.1
<b>Total HMDA</b>	<b>433</b>	<b>43.9</b>	<b>77,179</b>	<b>61.8</b>
<b>Total Small Business</b>	<b>541</b>	<b>54.9</b>	<b>46,287</b>	<b>37.1</b>
<b>Total Small Farm</b>	<b>12</b>	<b>1.2</b>	<b>1,435</b>	<b>1.1</b>
<b>TOTAL LOAN</b>	<b>986</b>	<b>100.0</b>	<b>124,901</b>	<b>100.0</b>

### **Geographic Distribution of Loans**

Chemung’s overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the Non-Metropolitan New York assessment area. Lending penetration in LMI tracts was adequate for home purchase, good for refinance, and excellent for small business.

#### *Gap Analysis*

Chemung demonstrated an excellent level of dispersion in low- or moderate-income tracts in this assessment area. The maintained 100.0% penetration in low-income census tracts throughout the review period and nearly 100.0% in moderate-income census tracts.

The subsequent table is a summary of the analysis of lending gaps in this assessment area.

<b>Non-Metropolitan New York Lending Gap Analysis January 1, 2019 – December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	1	0	100.0%
Moderate	4	1	75.0%
Middle	47	18	61.7%
Upper	12	4	66.7%
Income Unknown	1	1	0.0%
<b>2020</b>			
Low	1	0	100.0%
Moderate	4	0	100.0%
Middle	47	7	85.1%
Upper	12	1	91.7%
Income Unknown	1	1	0.0%
<b>2021</b>			
Low	1	0	100.0%
Moderate	4	0	100.0%
Middle	47	7	85.1%
Upper	12	3	75.0%
Income Unknown	1	1	0.0%
<b>2022</b>			
Low	1	0	100.0%
Moderate	9	3	66.7%
Middle	45	18	60.0%
Upper	16	5	68.8%
Income Unknown	2	2	0.0%

*Home Purchase Loans*

Chemung’s overall distribution of home purchase loans reflected adequate penetration throughout this assessment area based on adequate performance in both low-income and moderate-income census tracts when compared to the assessment area demographic and to the aggregate lending.

In 2022, the bank did not make any home purchase loans in low-income census tracts, but lending opportunities were very low as evidenced by just 0.4% of owner-occupied housing units located in low-income census tracts and a market aggregate of just 0.4% by number and 0.2% by dollar in low-income census tracts. In 2019 and 2020, the bank did not make any home purchase loans in low-income census tracts. In 2021, the bank made 2.0% by number and 1.3% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts was significantly above the 0.6% of owner-occupied

housing units located in low-income census tracts and significantly above the aggregate, which made 0.8% by number and 0.4% by dollar in low-income census tracts.

However, in 2022, the bank made 21.6% of home purchase loans by number and 18.0% by dollar in moderate-income census tracts. The bank's home purchase lending performance was significantly above the 9.5% of owner-occupied housing units located in moderate-income census tracts and was significantly above the aggregate, which made 13.7% by number and 10.5% by dollar of home purchase loans in moderate-income census tracts. In 2019 and 2021, the bank's performance fell short of that in 2022 in moderate-income census tracts and, in 2020, the bank made no loans in moderate-income census tracts in this assessment area.

### *Refinance Loans*

The geographic distribution of refinance loans reflected good penetration throughout the assessment areas based on adequate performance in low-income census tracts and good in moderate-income census tracts.

In 2022, the bank did not make any refinance loans in low-income census tracts, but lending opportunities were very low as evidenced by just 0.4% of owner-occupied housing units located in low-income census tracts. The market aggregate also found it difficult to make refinance loans, originating just 0.9% by number and 0.6% by dollar of refinance loans in low-income census tracts. The bank's performance in 2019 was similar to that in 2022. However, in 2020 and 2021, the bank significantly outperformed both the assessment area demographics and the market aggregate.

In 2022, the bank made 11.6% by number and 7.1% by dollar of refinance loans in moderate-income census tracts, outperforming both the assessment area demographic, with 9.5% of owner-occupied housing units located in moderate-income census tracts, and the market aggregate, which made 10.4% by number and 8.6% by dollar of refinance loans in moderate-income census tracts. The bank's performance in 2019, 2020 and 2021 was significantly lower than 2022.

### *Small Business Loans*

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

In 2022, the bank made 12.2% by number and 6.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was significantly above the 2.4% of businesses located in low-income census tracts and significantly above the aggregate, which made 2.2% by number and 10.8% by dollar of small business loans in low-income census tracts. The bank's performance was also excellent in each year of this evaluation period.

In 2022, in moderate-income census tracts, the bank's performance was also excellent by originating 14.6% by number and 13.8% by dollar of small business loans, exceeding the assessment area demographic of 14.5% and exceeding the market aggregate, which made 12.9% by number and 12.0% by dollar of small business loans in moderate-income census tracts. The bank's performance was comparable to 2022 throughout the evaluation period in this assessment area.

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

Chemung's overall distribution of HMDA and small business lending was, given the product lines offered, good among customers of different income levels and businesses of different sizes. This conclusion was based on good HMDA lending to both low-income and moderate-income borrowers, as well as good lending penetration to small businesses with GARs of \$1 million or less.

### *Home Purchase Loans*

Chemung's overall distribution of home purchase loans to borrowers of different income levels reflected, given the product lines offered, good penetration based on adequate distribution among low-income borrowers and good penetration among moderate-income borrowers.

In 2022, the bank made 10.8% by number and 6.1% by dollar to low-income borrowers and was below the 18.6% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 6.5% by number and 3.5% by dollar to low-income families. The bank's performance in 2021 was similar to 2022. In 2019 and 2020, performance was below the assessment area demographic and the market aggregate.

In 2022, the bank's lending to moderate-income borrowers was 13.5% by number and 9.5% by dollar, which was below the aggregate performance of 23.8% by number, below 17.1% by dollar, and slightly below the 17.5% moderate-income families in the assessment area. The bank's performance in 2020 was similar to that in 2022. Chemung performed better in 2019 and 2021, when it exceeded the assessment area demographic and was similar to the market aggregate.

### *Refinance Loans*

Chemung's overall distribution of refinance loans to borrowers of different income levels reflected, given the product lines offered, good penetration based on good distribution among low-income and moderate-income borrowers.

In 2022, the bank's lending to low-income borrowers was 11.6% by number and 6.7% by dollar and was above the aggregate lending data, at 8.4% by number and 4.5% by dollar. The bank's performance was below the 18.6% of low-income families in the assessment area. The bank's performance in 2019 through 2021 was similar to its 2022 performance.

In 2022, the bank's lending to moderate-income borrowers was 23.3% by number and 20.5% by dollar and was above the aggregate lending data at 20.6% by number, 14.7% by dollar, and also above the 17.5% moderate-income families in the assessment area. The bank's performance in 2019 was similar to 2022. In 2020 and 2021, the bank was below the assessment area demographic and the market aggregate.

### *Small Business Loans*

The overall level of lending to small businesses was good based on the bank's lending performance exceeding aggregate lending in three of the four years in the evaluation period.

In 2022, the bank originated 36.6% of loans by number and 18.2% by dollar to businesses with GARs of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 55.5% by number and 46.9% by dollar, in addition to being significantly below the 89.3% percentage of businesses in the assessment area with GARs of \$1 million or less. The bank originated 53.7% of loans by number 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. However, from 2019 through 2021, the bank exceeded aggregate lending and originated a similar percentage of loans in amounts of \$100,000 or less.

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

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

### Community Development Lending

Chemung was a leader in community development lending in the Non-Metropolitan New York assessment area. The community development lending in this assessment area represented 25.2% of the bank's total community development lending across all assessment areas.

The bank made seven PPP loans in amounts less than \$1 million to nonprofits that were qualified, totaling approximately \$583 thousand. These loans were made to organizations that provided community development services to LMI individuals and families, as well as to small businesses.

As shown in the subsequent table, the bank originated 29 qualified community development loans totaling \$27.5 million across this assessment area. This lending level represents an annualized performance over 51 months of 6.8 loans, totaling approximately \$6.5 million. Compared to the previous evaluation where the bank had an annualized performance over 24 months of eight loans totaling \$3.4 million, this represented an annualized performance decrease of 15.0% by number but an increase of 91.2% by dollar.

Chemung's community development loans primarily helped to finance community service efforts, consistent with the needs identified by community contacts. The subsequent table illustrates the community development lending activity by year and purpose.

<b>Non-Metropolitan New York Community Development Lending April 1, 2019 – June 30, 2023</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	0	0	5	3,360	0	0	0	0	<b>5</b>	<b>3,360</b>
2020	0	0	5	2,351	2	127	2	128	<b>9</b>	<b>2,606</b>
2021	0	0	4	3,718	2	230	1	98	<b>7</b>	<b>4,046</b>
2022	2	10,374	5	5,600	0	0	0	0	<b>7</b>	<b>15,974</b>
2023	0	0	1	1,500	0	0	0	0	<b>1</b>	<b>1,500</b>
<b>Total</b>	<b>2</b>	<b>10,374</b>	<b>20</b>	<b>16,529</b>	<b>4</b>	<b>357</b>	<b>3</b>	<b>226</b>	<b>29</b>	<b>27,486</b>
<b>% of Total</b>	<b>6.9</b>	<b>37.7</b>	<b>69.0</b>	<b>60.1</b>	<b>13.8</b>	<b>1.3</b>	<b>10.3</b>	<b>0.8</b>	<b>100.0</b>	<b>100.0</b>

The following are examples of community development loans in the assessment area:

- In 2019, the bank provided a \$1 million loan to a critical access hospital (CAH) located in a designated underserved census tract. CAH are defined by the state as hospitals that operate in rural areas where the next nearest hospital is located 35 or more miles away.
- In 2020, the bank provided a \$1.5 million loan to a health facility that was funded by Medicaid.
- In 2021, the bank provided a \$600 thousand loan to an organization dedicated to assisting municipalities provide LMI individuals and families with housing needs throughout Chemung, Steuben, and Schuyler Counties.

- In 2022, the bank provided two loans, totaling \$10.4 million, for 39 units of affordable housing in this assessment area. The loan was advanced in conjunction with equity from the syndication of the federal and state Low-Income Housing Tax Credit program.

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

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

### **INVESTMENT TEST**

Chemung’s performance was adequate in the investment test for this assessment area. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. The bank made occasional use of innovative and/or complex investments to support community development initiatives. The bank exhibited adequate responsiveness to credit and community development needs.

### **Investment and Grant Activity**

The bank made an adequate level of qualified community development investments and grants. Of the bank’s overall mortgage-backed securities purchases made during this evaluation period, Chemung allocated \$1.2 million to this assessment area, invested in a municipal bond to a town located in a moderate-income census tract, and made 62 grants (\$241.3 thousand), for total investments of \$1.7 million. On an annualized basis, qualified investments by dollar decreased since prior evaluation, with \$393.5 thousand in annualized qualified investments and grants at this evaluation compared to \$675.5 thousand in annualized qualified investments and grants at the previous evaluation.

The subsequent table details the institution’s qualified grants by year and purpose.

<b>Non-Metropolitan New York Qualified Grants April 1, 2019 – June 30, 2023</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	0	0	14	68.2	1	3.4	0	0	<b>15</b>	<b>71.6</b>
2020	0	0	15	74.1	1	2.5	0	0	<b>16</b>	<b>76.6</b>
2021	0	0	12	14.4	1	2.5	0	0	<b>13</b>	<b>16.9</b>
2022	0	0	16	68.7	0	0	0	0	<b>16</b>	<b>68.7</b>
2023	0	0	2	7.5	0	0	0	0	<b>2</b>	<b>7.5</b>
<b>Total</b>	<b>0</b>	<b>0</b>	<b>59</b>	<b>232.9</b>	<b>3</b>	<b>8.4</b>	<b>0</b>	<b>0</b>	<b>62</b>	<b>241.3</b>
<b>% of Total</b>	<b>0</b>	<b>0</b>	<b>95.2</b>	<b>96.5</b>	<b>4.8</b>	<b>3.5</b>	<b>0</b>	<b>0</b>	<b>100.0</b>	<b>100.0</b>

The following are examples of community development investments and grants that benefited the assessment area.

- In 2020 and 2021, the bank invested a total of \$1.2 million in a mortgage-backed securities pools that supported the purchase of homes for LMI borrowers in this assessment area.
- From 2019 to 2023, the bank provided 27 grants totaling \$195 thousand to a nonprofit organization that provided basic needs, including clothing, food and shelter in times of crisis.
- In 2019, 2021, and 2022, the bank provided five grants totaling \$3,500 to an organization that provided free and reduced-cost food for homebound, LMI elderly.

### Responsiveness to Credit and Community Development Needs

Chemung exhibited adequate responsiveness to assessment area credit and community development needs. The bank’s qualified investments primarily promoted affordable housing efforts, which was a community development need within this assessment area.

### Community Development Initiatives

The bank made occasional use of innovative and/or complex investments to support community development initiatives. New investments consisted of mortgage-backed securities and a municipal bond purchase.

### SERVICE TEST

Delivery systems were accessible to the bank’s geographies and individuals of different income levels in this assessment area. The bank’s record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced this assessment area, particularly LMI geographies and/or LMI individuals. The bank provided a relatively high level of community development services.

### Retail Services

Delivery systems were accessible to the bank’s geographies and individuals of different income levels in this assessment area. Chemung maintained eight full-service branches and eight ATMs. One branch (12.5%) and one ATM (12.5%) were located in LMI geographies. The subsequent table details the distribution of the bank’s branch offices and ATM network by census tract income.

Non-Metropolitan New York Branch and ATM Distribution by Geography Income Level As of December 31, 2022								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	1	1.4	4,086	1.8	0	0	0	0
Moderate	9	12.3	29,278	12.6	1	12.5	1	12.5
Middle	45	61.6	144,107	62.1	6	75.0	6	75.0
Upper	16	21.9	53,700	23.1	1	12.5	1	12.5
NA	2	2.7	991	0.4	0	0	0	0
<b>Total</b>	<b>73</b>	<b>100.0</b>	<b>232,162</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>

*Source: 2020 ACS data and Bank Records*



In addition to the physical access to branches and ATMs, the bank offered other alternative delivery systems in all assessment areas that improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

To the extent changes have been made, the bank’s opening and closing of branches had not adversely affected the accessibility of delivery systems, particularly in LMI census tracts. During the evaluation period, Chemung did not open any new branch offices; however, since the last evaluation, the bank closed one branch located in an upper-income tract, removed two offsite cash-only ATMs located in middle- and upper-income tracts and relocated one branch from a middle-income tract to another middle-income tract.

Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly LMI census tracts or individuals. Chemung’s service hours were generally similar throughout this assessment area. All branches were open from 9:00 a.m. to 4:30 p.m. Monday through Friday, with the same lobby and drive-thru hours. The bank also offered Saturday hours three locations, one of which was located in an underserved middle-income census tract.

The bank’s products and services in this assessment area, including the low-cost savings and checking accounts, were consistent with those discussed at the institution level.

### Community Development Services

Chemung provided a relatively high level of community development services in this assessment area. The bank provided 93 services, totaling 2,027.5 hours, during the evaluation period. These services primarily addressed community services, which accounted for 23.3% of the bank’s total community development services by number and 20.9% by hours.

The subsequent table summarizes the bank’s community development services by year and purpose.

<b>Non-Metropolitan New York Community Development Services April 1, 2019 – June 30, 2023</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2019	1	14	4	0	<b>19</b>
2020	3	8	6	0	<b>17</b>
2021	15	15	11	0	<b>41</b>
2022	5	7	4	0	<b>16</b>
2023	0	0	0	0	<b>0</b>
<b>Total</b>	<b>24</b>	<b>44</b>	<b>25</b>	<b>0</b>	<b>93</b>
<b>% of Total</b>	<b>25.8</b>	<b>47.3</b>	<b>26.9</b>	<b>0</b>	<b>100.0</b>

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

- In 2019, 2020, 2021, one employee served as a board member of a nonprofit organization that provides inclusive programs for LMI children and their families to increase school readiness, support informed parenting, and strengthen community relationships.

- In 2021 and 2022, one employee served on the board of a nonprofit organization that focuses on LMI girls and women by providing them with grants in the areas of education, health, wellness, career, and life skills.
- In 2022, an employee served on the Regional Loan Committee of a nonprofit organization that provides small businesses with affordable loans and resources.

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## **METROPOLITAN AREA MSA 10580 (ALBANY-SCHENECTADY-TROY, NY) FULL REVIEW**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

As of June 30, 2022, 22.1% of Chemung's total deposits and 37.9% of HMDA-related and small business loans in New York State were held in this assessment area. With a deposit market share of 1.4%, Chemung ranked 14<sup>th</sup> of 23 in depository institutions, first being Keybank National Association, which held 25.5% of deposits. Other lead banks in terms of deposit market share were Citizens Bank and Bank of America.

Chemung operated 7 of its 30 branch locations (23.3%) and 9 of its 36 ATMs (25.0%) in this assessment area.

### **PERFORMANCE CONTEXT**

#### *Demographic Characteristics*

The MSA 10580 (Albany-Schenectady-Troy, NY) assessment area included Albany County, Saratoga County, and Schenectady County. According to the 2020 U.S. Census, the population of this assessment area was 708,418. The assessment area consisted of 195 census tracts, of which 17 or 8.7% were low-income, 31 or 15.9% were moderate-income, 88 or 45.1% were middle-income, 53 or 27.2% were upper-income, and 6 or 3.1% were of unknown-income.

#### *Income Characteristics*

Based on the 2020 U.S. Census, the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area had 166,948 families, of which 20.8% were low-income (5.8% of which were below the poverty level), 16.8% were moderate-income, 21.4% were middle-income, and 41.0% were upper-income.

The FFIEC median family incomes for the counties comprising the MSA as of the 2020 U.S. Census were as follows:

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$89,459	\$97,240	8.7
Albany County, NY	\$90,777	\$95,923	5.7
Saratoga County, NY	\$95,656	\$106,258	11.1
Schenectady County, NY	\$83,491	\$86,124	3.2
MSA 10580 (Albany-Schenectady-Troy, NY)	\$88,611	\$95,438	7.7
New York State	\$78,570	\$87,270	11.1

*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 10580 (Albany-Schenectady-Troy, NY) assessment area had 319,323 housing units, of which 55.7% were owner-occupied, 32.5% were rental, and 11.8% were vacant. Of the total housing units, 8.9% were located in low-income census tracts, 15.3% in moderate-income census tracts, 46.9% in middle-income census tracts, 27.7% in upper-income census tracts, and 1.2% in unknown-income census tracts. In low-income census tracts, 21.6% of housing units were owner-occupied, 56.3% were rental units, and 22.1% were vacant. In moderate-income census tracts, 36.0% of housing units were owner-occupied, 46.7% were rental units, and 17.3% were vacant.

The median age of housing stock in this assessment area was 60 years old, with 31.8% of the stock built before 1950. The median age of housing stock was 61 years in low-income tracts and 61 years in moderate-income tracts. According to the 2020 U.S. Census, the median housing value in this assessment area was \$231,160 with an affordability ratio of 31.9. The median gross rent in the assessment area was \$1,060 per month.

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>			
<b>Housing Characteristics</b>			
<b>Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$231,160	31.9	\$1,060
Albany County, NY	\$230,300	29.7	\$1,057
Saratoga County, NY	\$266,000	32.0	\$1,151
Schenectady County, NY	\$172,500	38.5	\$964
MSA 10580 (Albany -Schenectady-Troy, NY)	\$221,155	32.9	\$1,039
New York State	\$325,000	21.9	\$1,315

*Source: 2011 – 2015 U.S. Census Bureau American Community Survey  
2016 – 2020 U.S. Census Bureau American Community Survey*

### **Housing Cost Burden**

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD’s Comprehensive Housing Affordability Strategy data, within the assessment area, 42.0% of all rental households had rental costs that

exceeded 30% of their incomes, 76.4% of low-income rental households had rental costs that exceeded 30% of their income, and 29.3% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD’s data, within this assessment area, 17.8% of homeowners had housing costs that exceeded 30.0% of their incomes, 62.3% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 32.3% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the “Housing Cost Burden” table below for more details.

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>						
<b>Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	76.4%	29.3%	42.0%	62.3%	32.3%	17.8%
Albany County, NY	77.2%	32.1%	44.4%	63.2%	33.7%	17.6%
Saratoga County, NY	76.2%	33.2%	35.7%	61.3%	32.9%	17.9%
Schenectady County, NY	74.3%	16.3%	43.8%	62.5%	28.7%	18.1%
MSA 10580 (Albany-Schenectady-Troy, NY)	75.0%	27.5%	41.6%	61.7%	31.2%	17.9%
New York State	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

\*Cost Burden is housing cost that equals 30% or more of household income  
 Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy

**Labor, Employment and Economic Characteristics**

According to D&B data, there were 30,268 businesses operating in this assessment area in 2022, of which 5.4% were in low-income census tracts and 9.5% were in moderate-income tracts. Of the total businesses operating in the assessment area, 90.1% were small businesses with GARs of \$1 million or less, of which 5.3% were in low-income census tracts and 9.5% were in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 3.5% in 2019, increased to 6.9% in 2020, and decreased to 4.3% in 2021. New York State had an unemployment rate of 3.8% in 2019, increased to 9.9% in 2020, and decreased to 6.9% in 2021. The COVID-19 pandemic contributed to the high unemployment rates in 2020 and 2021, within the assessment area and in New York State. Additional unemployment rates are provided in the subsequent table.

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.5%	6.9%	4.3%
Albany County, NY	3.5%	6.9%	4.4%
Saratoga County, NY	3.2%	6.4%	3.8%
Schenectady County, NY	3.7%	7.7%	4.9%
MSA 10580 (Albany-Schenectady-Troy, NY)	3.5%	6.9%	4.3%
New York State	3.8%	9.9%	6.9%

Source: BLS, Local Area Unemployment Statistics

Additional demographic data for this assessment area is provided in the subsequent table:

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>								
<b>Assessment Area Demographics Table</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	17	8.7	11,457	6.9	3,407	29.7	34,701	20.8
Moderate-income	31	15.9	19,712	11.8	2,123	10.8	28,105	16.8
Middle-income	88	45.1	79,929	47.9	3,193	4.0	35,753	21.4
Upper-income	53	27.2	55,137	33.0	934	1.7	68,389	41.0
Unknown-income	6	3.1	713	0.4	93	13.0	0	0.0
<b>Total Assessment Area</b>	<b>195</b>	<b>100.0</b>	<b>166,948</b>	<b>100.0</b>	<b>9,750</b>	<b>5.8</b>	<b>166,948</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	28,278	6,098	3.4	21.6	15,933	56.3	6,247	22.1
Moderate-income	48,867	17,579	9.9	36.0	22,831	46.7	8,457	17.3
Middle-income	149,872	90,072	50.7	60.1	42,398	28.3	17,402	11.6
Upper-income	88,386	63,612	35.8	72.0	19,731	22.3	5,043	5.7
Unknown-income	3,920	371	0.2	9.5	2,874	73.3	675	17.2
<b>Total Assessment Area</b>	<b>319,323</b>	<b>177,732</b>	<b>100.0</b>	<b>55.7</b>	<b>103,767</b>	<b>32.5</b>	<b>37,824</b>	<b>11.8</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	1,623	5.4	1,457	5.3	150	5.9	16	3.7
Moderate-income	2,870	9.5	2,581	9.5	247	9.7	42	9.8
Middle-income	14,733	48.7	13,209	48.4	1,328	52.0	196	45.8
Upper-income	8,932	29.5	8,211	30.1	617	24.2	104	24.3
Unknown-income	2,110	7.0	1,828	6.7	212	8.3	70	16.4
<b>Total Assessment Area</b>	<b>30,268</b>	<b>100.0</b>	<b>27,286</b>	<b>100.0</b>	<b>2,554</b>	<b>100.0</b>	<b>428</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>90.1</b>		<b>8.4</b>		<b>1.4</b>
	<b>Total Farms by</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	4	1.1	4	1.1	0	0.0	0	0.0
Moderate-income	12	3.2	12	3.3	0	0.0	0	0.0
Middle-income	265	70.9	257	70.4	8	88.9	0	0.0
Upper-income	91	24.3	90	24.7	1	11.1	0	0.0
Unknown-income	2	0.5	2	0.5	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>374</b>	<b>100.0</b>	<b>365</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.6</b>		<b>2.4</b>		<b>.0</b>

Source: 2022 FFIEC Census Data and 2022 D&B Information

### ***Community Contacts***

Examiners conducted community contact interviews with two community organizations that served the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area:

An interview was conducted with an executive director of a nonprofit community loan fund whose mission was to promote sustainable community development efforts for economically underserved people and communities by lending to nonprofit organizations and small businesses. The contact stated that challenges in the area included the increased cost of living and the increase in poverty levels. In the rural and/or low-income communities, businesses needed help with marketing, especially in marginalized areas. A substantial challenge for start-up businesses was financing. There was also a substantial increase in requests from small businesses for financial literacy training, workshops, technical assistance, and one-on-one consulting, with current requests exceeding those pre-COVID.

An interview was conducted with an executive director of a housing authority whose mission was to provide safe, decent housing for elderly families, persons with disabilities on fixed incomes, and working families who were moving towards self-sufficiency. The contact stated that affordable housing continued to be a great need in the community, with hundreds of applicants waitlisted for affordable housing developments. Local credit needs also included credit counseling and financial literacy. The contact added that many clients did not have bank accounts or good credit.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The bank's lending activity reflected good responsiveness to this assessment area's credit needs. The bank's geographic distribution of loans reflected good penetration throughout the assessment area. The distribution of borrowers reflected, given the product lines offered, adequate penetration among individuals of different income levels and businesses of different sizes. The bank exhibited a good record of serving low-income individuals and areas and very small businesses. In addition, the bank made a relatively high level of community development loans and made extensive use of innovative and flexible lending practices in serving assessment area credit needs.

#### **Lending Activity**

Chemung's lending activity demonstrated good responsiveness to the retail credit needs of this assessment area. Chemung's market share of deposits remained stable during the evaluation period. For HMDA lending, home purchase lending increased while refinance lending remained relatively steady. The bank's overall small business lending market share also remained relatively steady with a slight increase in 2020 and 2021 which was largely attributed to the origination of PPP loans.

In 2022, the bank ranked 14<sup>th</sup> out of 23 institutions with a deposit market share of 1.4%. In total HMDA lending, the bank ranked 37<sup>th</sup> out of 297 reporters with a market share of 0.5%, including market shares of 0.4% in home purchase lending and 0.5% in refinance. Chemung ranked 13<sup>th</sup> out of 116 reporters with a market share of 1.0% in small business lending. Chemung's market share of deposits and HMDA lending in 2022 was consistent with that in 2019 through 2021.

Chemung's HMDA and small business lending in this assessment areas is summarized in the following table:

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2019 to December 31, 2022</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	5	1.0	423	0.1
Home Purchase	158	31.5	47,371	12.3
Multifamily Housing	47	9.4	256,673	66.4
Refinancing	291	58.1	81,988	21.2
<b>Total HMDA</b>	<b>501</b>	<b>29.6</b>	<b>386,455</b>	<b>61.3</b>
<b>Total Small Business</b>	<b>1,192</b>	<b>70.4</b>	<b>244,287</b>	<b>38.7</b>
<b>Total Small Farm</b>	<b>1</b>	<b>0.1</b>	<b>45</b>	<b>0.0</b>
<b>TOTAL LOAN</b>	<b>1,694</b>	<b>100.0</b>	<b>630,787</b>	<b>100.0</b>

### Geographic Distribution of Loans

Chemung’s overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area based on lending penetration in LMI tracts that was excellent for home purchase, good for refinance, and adequate for small business loans.

#### *Gap Analysis*

Chemung demonstrated a good level of dispersion in LMI tracts in this assessment area. In 2019, 2021 and 2022, the bank had penetrations less than 50% in low-income tracts. In 2019, bank had 33% in penetration in moderate-income tracts. However, this can be attributed to factors that include the high degree of competition for financial services and loans in the assessment areas, and the high cost of housing.



<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2019 – December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	17	10	41.2%
Moderate	30	20	33.3%
Middle	77	41	46.8%
Upper	41	12	70.7%
Income Unknown	3	3	0.0%
<b>2020</b>			
Low	17	8	52.9%
Moderate	30	10	66.7%
Middle	77	16	79.2%
Upper	41	4	90.2%
Income Unknown	3	1	66.7%
<b>2021</b>			
Low	17	9	47.1%
Moderate	30	8	73.3%
Middle	77	20	74.0%
Upper	41	3	92.7%
Income Unknown	3	2	33.3%
<b>2022</b>			
Low	17	11	35.3%
Moderate	31	15	51.6%
Middle	88	41	53.4%
Upper	53	17	67.9%
Income Unknown	6	5	16.7%

*Home Purchase Loans*

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

In 2022, the bank 2.4% by number and 1.0% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was below the 3.4% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 5.3% by number and 3.1% by dollar in low-income census tracts. However, from 2019 through 2021, Chemung outperformed 2022 as the bank exceeded both the assessment area demographic and the lending aggregate each year.

In 2022, the bank made 14.6% of home purchase loans by number and 12.4% by dollar in moderate-income census tracts. The bank's home purchase lending performance was above the 9.9% of owner-occupied

housing units located in moderate-income census tracts and was above the aggregate which made 13.1% by number and 9.7% by dollar. The bank's performance in 2020 and 2021 was similar to 2022. Performance in 2019 was below that in 2020 as the bank was below both the assessment area demographic and the lending aggregate.

#### *Refinance Loans*

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

In 2022, the bank did not make any refinance loans in low-income census tracts. However, from 2019 through 2021, Chemung outperformed the lending aggregate each year and also outperformed, or was similar to, the assessment area demographic. In 2021, the bank made 6.8% by number and 3.9% by dollar of refinance loans in low-income census tracts. The bank's performance in low-income census tracts was significantly above the 2.9% of owner-occupied housing units located in low-income census tracts and significantly above the aggregate, which was 1.6% by number and 1.1% by dollar. The bank's performance in 2020 was slightly below 2021, while in 2019, the bank's performance exceeded levels in both 2020 through 2022.

In 2022, the bank made 7.7% by number and 4.7% by dollar of refinance loans in moderate-income census tracts. Chemung's refinance lending performance in moderate-income census tracts was slightly below the 9.9% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 10.8% by number and 8.8% by dollar of refinance loans in moderate-income census tracts. The bank's performance in 2021 exceeded 2022; however, performance in 2019 and 2020 was below that in 2022.

#### *Small Business Loans*

The geographic distribution of small business loans reflected good penetration in low-income census tracts and adequate penetration in moderate-income census tracts.

In 2022, the bank made 4.4% by number and 5.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly below the 5.4% of businesses located in low-income census tracts and slightly below the aggregate, which made 5.5% by number and 6.0% by dollar of small business loans in low-income census tracts. Chemung's performance in 2021 was below that in 2022 while performance in 2020 was similar to that in 2022. The bank's performance in 2019 exceeded each year from 2020 through 2022.

In 2022, the bank made 11.3% by number and 12.0% by dollar of small business loans in moderate-income census tracts. Chemung's small business lending performance in moderate-income census tracts was above the 9.5% of businesses located in moderate-income census tracts and above the aggregate, which made 9.0% by number and 7.8% by dollar of small business loans in moderate-income census tracts. Chemung's performance from 2019 through 2021 was below that in 2022, as the bank was below both the assessment area demographic and the aggregate.

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

Chemung's overall distribution of HMDA and small business lending was adequate, given the product lines offered, among customers of different income levels and businesses of different sizes. This conclusion was based on poor HMDA lending to low-income borrowers and adequate distribution of HMDA loans to moderate-income borrowers and to small businesses with GARs of \$1 million or less.

### *Home Purchase Loans*

Chemung's overall distribution of home purchase loans to borrowers of different income levels reflected, given the product lines offered, adequate penetration based on poor distribution among low-income borrowers and good penetration among moderate-income borrowers.

In 2022, the bank made 2.4% by number and 1.0% by dollar to low-income borrowers and was significantly below the 20.8% of low-income families in the assessment area. Performance was also significantly below aggregate lending which made 10.6% by number and 6.1% by dollar. Chemung's performance from 2019 through 2021 exceeded that in 2022; however, its performance was still below both the assessment area demographic and the lending aggregate.

In 2022, the bank made 14.6% by number and 9.6% by dollar to moderate-income borrowers which was below the 16.8% of moderate-income families in the assessment area. Performance was significantly below aggregate lending which made 24.9% by number and 19.3% by dollar. Chemung's performance 2021 was similar to 2022 while performance in 2019 and 2020 exceeded that in 2022, as the bank was above the assessment area demographic but below the lending aggregate.

### *Refinance Loans*

Chemung's borrower distribution reflected, given the product lines offered, poor penetration among low-income customers and good penetration among moderate-income customers for refinance lending.

In 2022, the bank did not make any loans to low-income borrowers. In 2021, the bank's lending to low-income borrowers was 1.4% by number and 0.7% by dollar and was significantly below the aggregate lending data, at 7.1% by number and 4.1% by dollar. The bank's performance was also significantly below the 19.5% of low-income families in the assessment area. Chemung's performance in 2019 and 2022 exceeded that in 2021; however, its performance was still significantly below the assessment area demographic and below the lending aggregate.

In 2022, the bank's lending to moderate-income borrowers, at 7.7% by number and 3.6% by dollar, was significantly below the aggregate lending data at 24.1% by number and 19.4% by dollar, and significantly below the 16.8% moderate-income families in the assessment area. Chemung's performance in 2020 and 2021 exceeded that in 2020, while performance in 2019 was similar to that in 2022.

### *Small Business Loans*

Chemung's borrower distribution reflected, given the product lines offered, adequate penetration among customers for small business lending.

In 2022, the bank originated 34.4% of loans by number and 28.3% by dollar to businesses with GARs of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data, at 49.0% by number and 33.4% by dollar, in addition to being significantly below the 90.1% percentage of businesses in the assessment area with GARs of \$1 million or less. The bank also originated 31.9% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses. Chemung's performance from 2019 through 2021 exceeded that in 2022 by outperforming the lending aggregate but was below the percentage of businesses in the assessment area with GARs of \$1 million or less.

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

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

**Community Development Lending**

Chemung’s level of community development lending was relatively high in MSA 10580 (Albany-Schenectady-Troy, NY). The community development lending in this assessment area represented 27.0% of the bank’s total number of community development loans across all assessment areas.

The bank made one PPP loan in an amount greater than \$1 million, totaling approximately \$1.1 million, which also had a primary purpose of community development. Five PPP loans in amounts less than \$1 million to nonprofits were also qualified, totaling approximately \$1.1 million. These loans were to organizations that provide community development services for LMI individuals and/or geographies.

As shown in the subsequent table, the bank originated 31 qualified community development loans, totaling \$11.8 million across this assessment area. This lending level represented an annualized performance over 51 months of 7.3 loans, totaling approximately \$2.8 million. Compared to the previous evaluation where the bank had an annualized performance over 24 months of 5 loans totaling \$1.4 million, this represented an annualized performance increase of 46.0% by number and an increase of 100% by dollar.

Chemung’s community development loans primarily helped to finance community service efforts, consistent with the needs identified by community contacts. The subsequent table illustrates the community development lending activity by year and purpose.

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>										
<b>Community Development Lending</b>										
<b>April 1, 2019 – June 30, 2023</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	0	0	2	875	2	100	0	0	4	975
2020	0	0	3	1,850	2	338	3	1,816	8	4,004
2021	0	0	6	2,365	1	75	1	172	8	2,612
2022	0	0	6	2,800	0	0	1	60	7	2,860
2023	0	0	3	1,077	1	250	0	0	4	1,327
<b>Total</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>8,967</b>	<b>6</b>	<b>763</b>	<b>5</b>	<b>2,048</b>	<b>31</b>	<b>11,778</b>
<b>% of Total</b>	<b>0</b>	<b>0</b>	<b>64.5</b>	<b>76.1</b>	<b>19.4</b>	<b>6.5</b>	<b>16.1</b>	<b>17.4</b>	<b>100.0</b>	<b>100.0</b>

The following are examples of community development loans in the assessment area:

- In 2019, the bank provided a \$75 thousand small business loan to a substance abuse center located in Albany, NY. The business provides a sliding fee scale and financial hardship package.

- Between 2020 through 2023, the bank provided six secured, revolving lines of credit, totaling a \$3.1 million to fund working capital of a local nonprofit. The organization provided social services for at risk youth.
- Between 2019 through 2022, the bank provided four loans, totaling \$2.9 million to a local nonprofit. The organization was founded to respond to the housing, emergency food, and neighborhood needs of LMI individuals and families.

### Innovative and/or Flexible Lending Practices

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

### INVESTMENT TEST

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

### Investment and Grant Activity

The bank made a significant level of qualified community development investments and grants. Of the bank’s overall mortgage-backed securities purchases made during this evaluation period, Chemung allocated \$18.3 million and 35 grants totaling \$92.7 thousand. Combined, this totaled \$18.4 million in this assessment area. Annualized this represented \$4.3 million by dollar amount, compared to prior annualized qualified investments of \$481.5 thousand by dollar amount. This demonstrated an increase of 793.0% by dollar amount compared to the prior evaluation.

The subsequent table details the institution’s qualified grants by year and purpose.

<b>MSA 10580 (Albany-Schenectady-Troy, NY)</b>										
<b>Qualified Grants</b>										
<b>April 1, 2019 – June 30, 2023</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	0	0	5	7	0	0	0	0	5	6.9
2020	1	1	8	27	0	0	0	0	9	27.7
2021	1	0	9	29	0	0	0	0	10	28.9
2022	1	2	8	26	0	0	0	0	9	27.7
2023	0	0	2	2	0	0	0	0	2	1.5
<b>Total</b>	<b>3</b>	<b>3</b>	<b>32</b>	<b>91</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>35</b>	<b>92.7</b>
<b>% of Total</b>	<b>8.6</b>	<b>2.8</b>	<b>91.4</b>	<b>97.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

The following are examples of community development investments and grants that benefited the assessment area.

- In 2020 and 2021, the bank invested a total of \$7.9 million in mortgage-backed securities pools that supported the purchase of single-family homes and condos for LMI borrowers. This amount represented the portion of this pool that served this assessment area.
- In 2020, 2021 and 2022, the bank provided 3 grants, totaling \$7,500, to an organization that provided food pantries.

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

Chemung exhibited good responsiveness to assessment area credit and community development needs. The bank's qualified investments primarily promoted affordable housing efforts, which is a community development need within this assessment area. Qualified grants promoted community services towards LMI individuals.

### **Community Development Initiatives**

The bank made occasional use of innovative and/or complex investments to support community development initiatives. The bank's new community development investments were comprised of mortgage-backed securities.

### **SERVICE TEST**

Chemung's delivery systems were accessible to all geographies of the assessment area and individuals of different income levels, changes in branch locations generally did not adversely affect accessibility, and hours and services did not vary in a way that inconvenienced its assessment area. Chemung provided a relatively high level of community development services within the assessment area.

### **Retail Services**

Delivery systems were accessible to the bank's geographies and individuals of different income levels in this assessment area. Chemung maintained seven full-service branches and nine ATMs. One branch (14.3%) and one ATM (11.1%) were located in LMI geographies. The subsequent table details the distribution of the bank's branch offices and ATM network by census tract income.

MSA 10580 (Albany-Schenectady-Troy, NY) Branch and ATM Distribution by Geography Income Level As of December 31, 2022								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	17	8.7	58,234	8.2	1	14.3	1	11.1
Moderate	31	15.9	96,943	13.7	0	0	0	0
Middle	88	45.1	328,603	46.4	4	57.1	5	55.6
Upper	53	27.2	210,651	29.7	1	14.3	1	11.1
NA	6	3.1	13,987	2.0	1	14.3	2	22.2
<b>Total</b>	<b>195</b>	<b>100.0</b>	<b>708,418</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>

*Source: 2020 ACS data and Bank Records*

In addition to the physical access to branches and ATMs, the bank offered other alternative delivery systems in all assessment areas that improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

To the extent changes have been made, the bank’s opening and closing of branches did not adversely affect the accessibility of delivery systems, particularly in LMI census tracts. During the evaluation period, Chemung did not open any new branch offices; however, the bank closed one off-site ATM located in a low-income census tract based on profit and loss analysis performed.

Services did not vary in a way that inconvenienced this assessment area, particularly LMI geographies and/or LMI individuals. Chemung did not offer extended hours in this assessment area. The bank offered Saturday branch hours at one location and Saturday drive-thru hours at two locations, each of which were in middle-income census tracts. However, Chemung had a full-service branch with ATM, as well as a stand-alone ATM, located in unknown-income census tracts in downtown Albany which were adjacent to LMI census tracts.

The bank’s products and services in this assessment area, including the low-cost savings and checking accounts, were consistent with those discussed at the institution level.

### Community Development Services

Chemung provided a relatively high level of community development services in this assessment area. The bank provided 58 services, totaling 1,591 hours during the evaluation period that primarily addressed community services. This activity accounted for 14.5% of the bank’s total community development services activity.

The subsequent table summarizes the bank’s community development services by year and purpose.

<b>MSA 10580 (Albany-Schenectady-Troy, NY)                      Community Development Services                      April 1, 2019 – June 30, 2023</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2019	1	4	2	0	<b>7</b>
2020	1	5	3	0	<b>9</b>
2021	1	18	9	0	<b>28</b>
2022	1	8	5	0	<b>14</b>
2023	0	0	0	0	<b>0</b>
<b>Total</b>	<b>4</b>	<b>35</b>	<b>19</b>	<b>0</b>	<b>58</b>
<b>% of Total</b>	<b>6.9</b>	<b>60.3</b>	<b>32.8</b>	<b>0</b>	<b>100.0</b>

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

- In 2021 and 2022, one employee served as a board member of a Community Development Financial Institution that provided loans to promote sustainable community development efforts for economically underserved people and communities.
- In 2019, 2020, 2021, and 2022, one employee served on the board of an economic development organization that provided investment throughout the City of Albany.
- In 2020 and 2021, an employee served on the board of a nonprofit organization that provided lending services to small- and medium-sized businesses and worked closely with its member banks and the SBA.



## METROPOLITAN AREA MSA 15380 (BUFFALO-CHEEKTOWAGA, NY) LIMITED REVIEW

### DESCRIPTION OF INSTITUTION’S OPERATIONS

A limited evaluation of Chemung’s performance in this assessment area was conducted.

Chemung did not operate any branches in this assessment area; however, the bank opened a LPO on May 3, 2021, where the bank maintained one deposit-taking ATM. This assessment area was comprised of Erie County.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	40	15.3	5.8	22.3
Moderate Income	46	17.6	12.1	16.3
Middle Income	102	39.1	46.4	20.6
Upper Income	63	24.1	35.2	40.9
Unknown	10	3.8	0.4	0
<b>Total</b>	<b>261</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 15380 (Buffalo-Cheektowaga, NY)	Below	Below	Below

Chemung’s lending test performance in this assessment area was below the New York State performance, as lending activity was adequate, geographic distribution was poor, and borrower distribution was adequate. The bank made no community development loans in this assessment area.

Investment test performance was below the New York State performance. The bank did not have any investments or donations in this assessment area.

Service test performance was below the New York State performance. The bank operated no branches and one ATM located in a middle-income census tract in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 13780 (BINGHAMTON, NY) LIMITED REVIEW

### DESCRIPTION OF INSTITUTION’S OPERATIONS

A limited evaluation of Chemung’s performance in MSA 13780 (Binghamton, NY) was conducted.

As of June 30, 2022, 11.8% of Chemung’s total deposits and 15.2% of HMDA-related and small business loans in New York State were held in this assessment area. With a deposit market share of 5.8%, Chemung ranked 6<sup>th</sup> in depository institutions, while M&T Bank ranked 1<sup>st</sup> with 50.9% of deposits. Other lead banks in terms of deposit market share were NBT Bank and Tioga State Bank.

Chemung operated 4 of its 30 locations (13.3%) and 4 of its 36 ATMs (11.1%) in this assessment area. This assessment area was comprised of Broome County and Tioga County.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 13780 (Binghamton, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	5	7.4	1.1	21.4
Moderate Income	14	20.6	14.7	17.7
Middle Income	31	45.6	49.3	20.4
Upper Income	17	25.0	34.9	40.6
Unknown	1	1.5	0.1	0.0
<b>Total</b>	<b>68</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 13780 (Binghamton, NY)	Below	Consistent	Consistent

Chemung’s lending test performance in this assessment area was below the New York State performance, as lending activity, including the geographic distribution, and borrower distribution was adequate. The bank made a total of 8 community development loans for \$2.6 million during the evaluation period.

Investment test performance was consistent with the New York State performance. The bank allocated the purchase of mortgage-backed securities investments totaling \$613.6 thousand to this assessment area. The bank also made 32 grants and donations totaling \$52 thousand.

Service test performance was consistent with the New York State performance. The bank operated two (50.0%) of its branches and two (50.0% ATMs in the assessment area in LMI census tracts. In addition, the bank had 42 instances, totaling 1,041 hours of community development services in this assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## METROPOLITAN AREA MSA 27060 (ITHACA, NY) LIMITED REVIEW

### DESCRIPTION OF INSTITUTION’S OPERATIONS

A limited evaluation of Chemung’s performance in MSA 27060 (Ithaca, NY) was conducted.

As of June 30, 2022, 5.2% of Chemung’s total deposits and 2.6% of HMDA-related and small business loans in New York State were held in this assessment area. With a deposit market share of 4.0%, Chemung ranked 6<sup>th</sup> in depository institutions, with Tompkins Community Bank being 1<sup>st</sup> with 64.3% of deposits. Other lead banks in terms of deposit market share were M&T Bank and the First National Bank of Groton.

Chemung operated 3 of its 30 locations (10.0%) and 4 of its 36 ATMs (11.1%) in this assessment area. This assessment area was comprised of Tompkins County.

Key demographics for this assessment area are listed on the chart below:

<b>MSA 27060 (Ithaca, NY) Assessment Area Demographics</b>				
<b>Income Category</b>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Family Income</b>
	<b>#</b>	<b>%</b>		
Low Income	0	0.0	0.0	19.8
Moderate Income	3	11.5	12.3	19.6
Middle Income	14	53.8	69.6	20.8
Upper Income	5	19.2	17.7	39.8
Unknown	4	15.4	0.4	0.0
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 27060 (Ithaca, NY)	Consistent	Consistent	Below

Chemung’s lending test performance in this assessment area was consistent with the New York State performance, as lending activity, geographic distribution, and borrower distribution was good. The bank made one community development loan for \$300 thousand during the evaluation period.

Investment test performance was consistent with the New York State performance. The bank allocated the purchase of mortgage-backed securities investments totaling \$4.4 million to this assessment area. The bank also made 21 grants and donations totaling \$33.4 thousand.

Service test performance was below the New York State performance. The bank operated 2 (66.7%) of its locations and 2 (50.0%) of its ATMs in the assessment area in LMI census tracts. In addition, the bank had two instances, totaling 100 hours of community development services in this assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D.

## COMMONWEALTH OF PENNSYLVANIA

### THE OVERALL CRA RATINGS IS: SATISFACTORY

*The Lending Test is rated: Low Satisfactory*

*The Investment Test is rated: High Satisfactory*

*The Service Test is rated: Low Satisfactory*

The major factors supporting the rating include:

#### LENDING TEST

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

#### INVESTMENT TEST

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

#### SERVICE TEST

- Delivery systems were reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas.
- The bank's record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced this assessment areas, particularly LMI geographies and/or LMI individuals.
- The bank made an adequate level of community development services.

## **SCOPE OF EVALUATION**

The evaluation of Chemung's activities in the Commonwealth of Pennsylvania consisted of a full-scope review of the Non-Metropolitan Pennsylvania assessment area. This assessment area was evaluated under full-scope procedures as it was the only assessment area in the Commonwealth of Pennsylvania. The geographic distribution of loans was not evaluated, as there were no low-income census tracts and only two moderate income tracts that were designated in 2022.

## **PERFORMANCE CONTEXT**

Pennsylvania's performance included the evaluation of the Non-Metropolitan Pennsylvania assessment area which encompassed portions of three contiguous counties located in the north-central portion of Pennsylvania. These counties were primarily rural with small towns and villages scattered across this assessment area. During the evaluation, there were no low-income census tracts in this assessment area. There were no moderate-income census tracts from 2019 to 2021; two moderate tracts were added in 2022, pursuant to the 2020 Census. The delineation of this assessment area did not change since the prior evaluation.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS**

Chemung's Pennsylvania operations were entirely within the Non-Metropolitan Pennsylvania assessment area. Please refer to the Description of Institution's Operations under the Non-Metropolitan Pennsylvania Assessment Area. Chemung's performance in the Pennsylvania assessment area received less weight in deriving the bank's overall CRA performance rating due to limited branch presence and deposit base. Pennsylvania's assessment area accounted for 2.9% of its total deposits, 7.3% of total lending activity, and 6.7% of the branches.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COMMONWEALTH OF PENNSYLVANIA**

Conclusions regarding Chemung's performance in Pennsylvania were solely based on the performance in the Non-Metropolitan Pennsylvania assessment area. Specific comments regarding the lending, investment, and service tests were discussed under the Non-Metropolitan Pennsylvania Assessment Area.

## NON-METROPOLITAN PENNSYLVANIA FULL REVIEW

### DESCRIPTION OF INSTITUTION’S OPERATIONS

As of June 30, 2022, 2.9% of Chemung’s total deposits and 100% of HMDA-related and small business loans in Pennsylvania were held in this assessment area. With a deposit market share of 2.2%, Chemung ranked 6<sup>th</sup> in depository institutions, 1<sup>st</sup> being Citizens & Northern Bank which held 37.9% of deposits. Other lead banks in terms of deposit market share were First Citizens Community Bank and PS Bank.

Chemung operated 2 of its 30 locations (6.7%) and 2 of its 36 ATMs (5.6%) in this assessment area.

During the evaluation there were no low-income census tracts in this assessment area. There were no moderate-income census tracts from 2019 to 2021; however, 2 moderate-income census tracts were added in 2022 pursuant to the 2020 Census.

### PERFORMANCE CONTEXT

#### *Demographic Characteristics*

The Non-Metropolitan Pennsylvania assessment area included the entirety of Bradford County and portions of Sullivan and Tioga Counties, PA. According to the 2020 U.S. Census, the population of this assessment area was 84,759. The assessment area consisted of 22 census tracts, of which none were low-income, 2 or 9.1% were moderate-income, 19 or 86.4% were middle-income, and 1 or 4.5% were upper-income.

#### *Income Characteristics*

Based on the 2020 U.S. Census, the Non-Metropolitan Pennsylvania assessment area had 23,499 families, of which 19.1% were low-income (8.8% of which were below the poverty level), 19.3% were moderate-income, 23.0% were middle-income, and 38.7% were upper-income.

The FFIEC median family incomes for the counties comprising the MSA as of the 2020 U.S. Census were as follows:

<b>Non-Metropolitan Pennsylvania Median Family Income Change</b>			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Assessment Area	\$63,037	\$63,196	0.3
Bradford County, PA	\$65,595	\$65,230	-0.6
Sullivan County, PA	\$60,360	\$63,295	4.9
Tioga County, PA	\$60,838	\$61,621	1.3
Non-Metropolitan Pennsylvania	\$61,372	\$65,202	6.2
Commonwealth of Pennsylvania	\$74,468	\$80,996	8.8

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

***Housing Characteristics***

Based on the 2020 U.S. Census data, the Non-Metropolitan Pennsylvania assessment area had 45,475 housing units, of which 57.0% were owner-occupied, 20.4% were rental, and 22.6% were vacant. Of the total housing units, none were located in low-income census tracts, 6.5% in moderate-income census tracts, 90.6% in middle-income census tracts, and 2.9% in upper-income census tracts. There were no low-income census tracts in this assessment area. In moderate-income census tracts, 57.7% of housing units were owner-occupied, 27.5% were rental units, and 14.8% were vacant.

The median age of housing stock in this assessment area was 60 years old, with 35.5% of the stock built before 1950. The median age of housing stock was 61 years in moderate-income tracts. According to the 2020 U.S. Census, the median housing value in this assessment area was \$151,893 with an affordability ratio of 35.2. The median gross rent in the assessment area was \$741 per month.

<b>Non-Metropolitan Pennsylvania Housing Characteristics</b>			
<b>Geographic Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$151,893	35.2	\$741
Bradford County, PA	\$150,900	34.7	\$737
Sullivan County, PA	\$160,100	31.1	\$649
Tioga County, PA	\$151,900	34.1	\$728
Non-Metropolitan Pennsylvania	\$123,625	42.0	\$692
Commonwealth of Pennsylvania	\$187,500	33.9	\$958
<small>Source: 2011 – 2015 U.S. Census Bureau American Community Survey 2016 – 2020 U.S. Census Bureau American Community Survey</small>			

***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 Comprehensive Housing Affordability Strategy data, within the assessment area, 36.6% of all rental households had rental costs that exceeded 30.0% of their incomes, 68.7% of low-income rental households had rental costs that exceeded 30.0% of their income, and 27.8% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD’s data, within this assessment area, 17.8% of homeowners had housing costs that exceeded 30.0% of their incomes, 57.5% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 27.7% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the “Housing Cost Burden” table below for more details.

<b>Non-Metropolitan Pennsylvania Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	68.7%	27.8%	36.6%	57.5%	27.7%	17.8%
Bradford County, PA	67.7%	31.1%	35.7%	57.0%	26.3%	17.2%
Sullivan County, PA	47.8%	12.5%	26.3%	47.8%	27.3%	18.5%
Tioga County, PA	72.3%	24.4%	39.1%	60.8%	29.7%	18.7%
Non-Metropolitan Pennsylvania	65.8%	22.4%	36.4%	56.5%	22.3%	16.6%
Commonwealth of Pennsylvania	72.3%	31.7%	42.0%	61.5%	28.9%	19.6%

*\*Cost Burden is housing cost that equals 30% or more of household income  
Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy*

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

According to D&B data, there were 3,081 businesses operating in this assessment area in 2022, of which 0.0% were in low-income census tracts and 7.3% were in moderate-income tracts. Of the total businesses operating in the assessment area, 88.9% were small businesses with GARs of \$1 million or less, of which 0.0% were in low-income census tracts and 7.1% were in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics, unemployment in the assessment area was 4.9% in 2019, increased to 8.2% in 2020, and decreased to 6.1% in 2021. Pennsylvania had an unemployment rate of 4.5% in 2019, increased to 9.1% in 2020, and decreased to 6.3% in 2021. The COVID-19 pandemic contributed to the high unemployment rates in 2020 and 2021, within the assessment area and in Pennsylvania. Additional unemployment rates are provided in the subsequent table.

<b>Non-Metropolitan Pennsylvania Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.9	8.2	6.1
Bradford County, PA	4.5	7.5	5.6
Sullivan County, PA	5.4	8.5	7.4
Tioga County, PA	5.4	9.0	6.6
Non-Metropolitan Pennsylvania	5.2	9.1	6.6
Commonwealth of Pennsylvania	4.5	9.1	6.3

*Source: BLS, Local Area Unemployment Statistics*

Additional demographic data for this assessment area is provided in the subsequent table:



Non-Metropolitan Pennsylvania Assessment Area Demographics Table										
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income			
	#	%	#	%	#	%	#	%		
Low-income	0	0.0	0	0.0	0	0.0	4,477	19.1		
Moderate-income	2	9.1	1,521	6.5	171	11.2	4,525	19.3		
Middle-income	19	86.4	21,130	89.9	1,820	8.6	5,394	23.0		
Upper-income	1	4.5	848	3.6	70	8.3	9,103	38.7		
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0		
<b>Total Assessment Area</b>	<b>22</b>	<b>100.0</b>	<b>23,499</b>	<b>100.0</b>	<b>2,061</b>	<b>8.8</b>	<b>23,499</b>	<b>100.0</b>		
	<b>Housing Units by Tract</b>	Housing Types by Tract								
		Owner-Occupied			Rental		Vacant			
		#	%	%	#	%	#	%		
Low-income	0	0	0.0	0.0	0	0.0	0	0.0		
Moderate-income	2,944	1,700	6.6	57.7	809	27.5	435	14.8		
Middle-income	41,199	23,242	89.6	56.4	8,185	19.9	9,772	23.7		
Upper-income	1,332	990	3.8	74.3	264	19.8	78	5.9		
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0		
<b>Total Assessment Area</b>	<b>45,475</b>	<b>25,932</b>	<b>100.0</b>	<b>57.0</b>	<b>9,258</b>	<b>20.4</b>	<b>10,285</b>	<b>22.6</b>		
	<b>Total Businesses by Tract</b>	Businesses by Tract & Revenue Size								
		Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0		
Moderate-income	226	7.3	194	7.1	23	10.6	9	7.1		
Middle-income	2,762	89.6	2,456	89.7	189	87.5	117	92.1		
Upper-income	93	3.0	88	3.2	4	1.9	1	0.8		
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0		
<b>Total Assessment Area</b>	<b>3,081</b>	<b>100.0</b>	<b>2,738</b>	<b>100.0</b>	<b>216</b>	<b>100.0</b>	<b>127</b>	<b>100.0</b>		
	<b>Percentage of Total Businesses:</b>			<b>88.9</b>		<b>7.0</b>		<b>4.1</b>		
	<b>Total Farms by Tract</b>	Farms by Tract & Revenue Size								
		Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0		
Moderate-income	1	0.4	1	0.4	0	0.0	0	0.0		
Middle-income	275	98.2	270	98.2	4	100.0	1	100.0		
Upper-income	4	1.4	4	1.5	0	0.0	0	0.0		
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0		
<b>Total Assessment Area</b>	<b>280</b>	<b>100.0</b>	<b>275</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>		
	<b>Percentage of Total Farms:</b>			<b>98.2</b>		<b>1.4</b>		<b>.4</b>		

Source: 2022 FFIEC Census Data and 2022 D&B Information

### ***Community Contacts***

Examiners conducted community contact interviews with two community organizations that served the Non-Metropolitan Pennsylvania assessment area: An interview was conducted with the business finance manager of a nonprofit organization whose mission was to positively impact the economic and community development of the northern region of Pennsylvania. The organization worked on three SBA 504 projects in Bradford County and was pursuing additional small business projects in Sullivan and Tioga Counties. The general banking and credit needs identified during the conversation were creative financing, affordable housing, and financial literacy.

An interview was conducted with the planning director of a local planning and development organization that provided financial support and technical assistance to municipalities and community organizations to promote economic development, historical preservation, and other initiatives. Current programs included a housing rehabilitation fund for income-eligible county residents to receive financial assistance to make necessary home repairs. The general banking and credit needs identified during the conversation were senior housing, less stringent underwriting, affordable housing, and more brick-and-mortar banks. The contact emphasized the aging community in the Northern Tier and the need for senior housing at all levels of affordability. Also mentioned was the need for businesses to invest in the LMI areas but who were unable to invest due to strict underwriting for business expansion loans. Additionally, the contact stated that a large percentage of homes were owned by out of county residents, used as vacation homes, which caused housing prices to inflate. The contact also stated that Sullivan County was considered underbanked and only three banks in the county that maintained a physical branch presence.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Lending levels reflected adequate responsiveness to community needs. The bank's performance with regard to the geographic distribution of loans was not evaluated, as there were no low-income census tracts and no moderate-income tracts until 2022. The distribution of borrowers reflected, given the product lines offered, good penetration among individuals of different income levels and businesses of different sizes. The bank exhibited an adequate record of serving low-income individuals and areas and very small businesses. In addition, the bank made a low level community development loans and made limited use of innovative and flexible lending practices in serving assessment area credit needs.

### **Lending Activity**

Chemung's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. Chemung's market share of deposits remained relatively stable during the evaluation period, decreasing slightly from 3.0% in 2019 to 2.2% in 2022. For HMDA lending, home purchase lending remained consistent, while refinance lending slightly decreased as of the evaluation period. The bank's overall small business lending market share also remained relatively steady with a slight increase in 2020 and 2021 due to PPP lending.

In 2022, the bank ranked 6<sup>th</sup> out of 7 institutions with a deposit market share of 2.2%. In total HMDA lending, the bank ranked 15<sup>th</sup> out of 162 reporters with a market share of 1.1%, including market shares of 1.0% in home purchase lending and 1.9% in refinance. Chemung ranked 11<sup>th</sup> out of 60 reporters with a market share of 1.9% in small business lending. Chemung's market share of deposits and HMDA lending in 2022 was consistent with that in 2019 through 2021. The bank's 2022 small business lending was slightly lower to

performance in 2019 and 2021. 2022 performance was significantly lower than performance in 2020 which was attributed to PPP lending.

Chemung’s HMDA and small business lending in this assessment areas is summarized in the following table:

<b>Non-Metropolitan Pennsylvania                      Summary of Lending                      January 1, 2019 - December 31, 2022</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	2	1.6	142	0.8
Home Purchase	37	30.1	4,778	28.4
Multifamily Housing	-	0	-	0
Refinancing	84	68.3	11,890	70.7
<b>Total HMDA</b>	<b>123</b>	<b>39.7</b>	<b>16,810</b>	<b>35.6</b>
<b>Total Small Business</b>	<b>164</b>	<b>52.9</b>	<b>27,076</b>	<b>57.4</b>
<b>Total Small Farm</b>	<b>23</b>	<b>7.4</b>	<b>3,298</b>	<b>7.0</b>
<b>TOTAL LOAN</b>	<b>310</b>	<b>100.0</b>	<b>47,184</b>	<b>100.0</b>

### **Geographic Distribution of Loans**

The bank’s performance with regard to the geographic distribution of loans was not evaluated, as there were no low-income census tracts and no moderate-income tracts until 2022.

#### *Gap Analysis*

Chemung demonstrated an adequate level of dispersion in LMI census tracts in this assessment area. In 2019, 2020, 2021, there were no LMI tracts. In 2022, the bank had 50% penetration in LMI tracts with the addition of 2 moderate-income tracts.

<b>Lending Gap Analysis Non-Metropolitan Pennsylvania January 1, 2019 – December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2019</b>			
Low	0	0	N/A
Moderate	0	0	N/A
Middle	18	3	83.3%
Upper	2	0	100.0%
Income Unknown	0	0	0%
<b>2020</b>			
Low	0	0	N/A
Moderate	0	0	N/A
Middle	18	2	88.9%
Upper	2	1	50.0%
Income Unknown	0	0	0%
<b>2021</b>			
Low	0	0	N/A
Moderate	0	0	N/A
Middle	18	3	83.3%
Upper	2	1	50.0%
Income Unknown	0	0	0%
<b>2022</b>			
Low	0	0	N/A
Moderate	2	1	50.0%
Middle	19	8	57.9%
Upper	1	0	100.0%
Income Unknown	0	0	0%

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. This conclusion was based on good distribution of HMDA loans to low-income borrowers, moderate-income borrowers, and to businesses with GAR of \$1 Million or less.

#### *Home Purchase Loans*

Chemung's overall distribution of home purchase loans to borrowers of different income levels was good based on adequate distribution to low-income borrowers and excellent to moderate-income borrowers.

In 2022, the bank made 11.1% by number and 6.5% by dollar to low-income borrowers and was below the 19.1% of low-income families in the assessment area. Performance was significantly above aggregate lending, which made 5.5% by number and 3.1% by dollar to low-income families. Performance in 2021 exceeded that in 2022 as the bank outperformed both the assessment area demographic and the lending aggregate. The bank made no loans to low-income borrowers in 2019 or 2020.

In 2022, the bank's lending to moderate-income borrowers was 44.4% by number and 38.8% by dollar, which was significantly above the aggregate performance of 24.0% by number and 18.0% by dollar, and significantly above the 19.3% moderate-income families in the assessment area. Chemung's performance in 2019 and 2021 was slightly below 2022 but still exceeded both the assessment area demographic and the lending aggregate. The bank's performance in 2020 was below 2022 when it was similar to the assessment area demographic and the lending aggregate.

### *Refinance Loans*

Chemung's overall distribution of refinance loans to borrowers of different income levels was good based on excellent distribution to low-income borrowers and good distribution to moderate-income borrowers.

In 2022, the bank's lending to low-income borrowers was 44.4% by number and 36.7% by dollar and was above the aggregate lending data, at 10.5% by number and 6.4% by dollar. The bank's performance was significantly above the 19.1% of low-income families in the assessment area. Chemung's performance in 2019 and 2021 was below that in 2022, while in 2020, the bank only originated one refinance loan to a low-income borrower.

In 2022, the bank's lending to moderate-income borrowers was 22.2% by number and 21.3% by dollar, above the aggregate lending data at 19.0% by number and 14.2% by dollar, and above the 19.3% moderate-income families in the assessment area. From 2019 through 2021, Chemung's performance was below that in 2022, as the bank was below both the assessment area demographic and the lending aggregate.

### *Small Business Loans*

The overall level of lending to small businesses was good as performance was above the aggregate lending in three of four years in the evaluation period.

In 2022, the bank originated 64.0% of loans by number and 48.8% by dollar to businesses with GARs of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data at 57.9% by number and 42.0% by dollar, in addition to being significantly below the 88.9% percentage of businesses in the assessment area with GARs of \$1 million or less. The bank also originated 56.0% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses. Chemung's performance in 2021 was below that in 2022. The bank's performance in 2019 and 2020 was also below that in 2022; however, the 2019 and 2020 performance exceeded the lending aggregate.

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

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

### Community Development Lending

Chemung made a low level of community development loans in this assessment area. The limited low and moderate geographies in this area, as well as the COVID-19 pandemic posed barriers to originating community development loans in this rural geography. The bank’s activity declined from the previous examination.

### Innovative and/or Flexible Lending Practices

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

### INVESTMENT TEST

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

### Investment and Grant Activity

The bank made an excellent level of qualified community development investments and grants. Of the bank’s overall mortgage-backed securities purchases made during this evaluation period, Chemung allocated \$679.9 thousand and made 7 grants totaling \$11.0 thousand for this assessment area. Combined, this totaled \$690.6 thousand by dollar. Annualized, this represented \$162.5 thousand by dollar. At the prior evaluation, the bank had no CD investments but had annualized grants of 3.5 by number and \$7 thousand by dollar. While the annualized number reflected a decrease of 20.0% by number, the bank’s dollar volume and equity investment activity reflected a substantial increase overall.

The subsequent table details the institution’s qualified grants by year and purpose.

Non-Metropolitan Pennsylvania Qualified Grants April 1, 2019 – June 30, 2023										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	0	0	1	1.5	0	0	0	0	1	1.5
2020	0	0	2	3.2	0	0	0	0	2	3.2
2021	0	0	2	3	0	0	0	0	2	3
2022	0	0	2	3	0	0	0	0	2	3
2023	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>10.7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>10.7</b>
<b>% of Total</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

## Responsiveness to Credit and Community Development Needs

Chemung exhibited good responsiveness to assessment area credit and community development needs. The bank's grants were focused on community services which was a community development need stated by the community contact interviewees.

## Community Development Initiatives

The bank made occasional use innovative and/or complex investments to support community development initiatives.

## SERVICE TEST

Chemung's performance was adequate in the service test for this assessment area. The bank's delivery systems were reasonably accessible to all geographies of the assessment area and individuals of different income levels. Changes in branch locations generally did not adversely affect accessibility, and hours and services did not vary in a way that inconvenienced its assessment area. Chemung provided an adequate level of community development services within this assessment area.

## Retail Services

Delivery systems were reasonably accessible to all portions of the bank's assessment areas, including LMI areas. Chemung maintained two full-service branches and two ATMs, each located in middle-income census tracts in rural geographies of this assessment area. Although classified as middle-income census tracts, according to the 2020 census, the branches were located in small towns with per capita incomes of \$23,316 and \$28,929 with 19.0% and 22.1%, respectively, of persons living below the poverty line, evidencing the bank's branches served LMI individuals. The subsequent table details the distribution of the bank's branch offices and ATM network by census tract income.

Non-Metropolitan Pennsylvania Branch and ATM Distribution by Geography Income Level As of December 31, 2022								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0	0	0
Moderate	2	9.1	5,728	6.8	0	0	0	0
Middle	19	86.4	75,707	89.3	2	100.0	2	100.0
Upper	1	4.6	3,324	3.9	0	0	0	0
NA	0	0.0	0	0.0	0	0	0	0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>84,759</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>

*Source: 2020 ACS data and Bank Records*

In addition to the physical access to branches and ATMs, the bank offered other alternative delivery systems in all assessment areas that improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

To the extent changes have been made, the bank's opening and closing of branches did not adversely affect the accessibility of delivery systems, particularly in LMI census tracts. During the evaluation period,

Chemung did not open any new branch offices; however, the bank closed one branch located in a middle-income census tract.

Services did not vary in a way that inconvenienced this assessment area, particularly LMI geographies and/or LMI individuals. While one of Chemung’s two branches offered weekend branch and drive-thru hours, both branches were located in middle-income census tracts. This assessment area had no LMI census tracts from 2019 through 2021, and in 2022 had two moderate-income census tracts located at least 21 miles from each of Chemung’s branches in this assessment area.

The bank’s products and services in this assessment area, including the low-cost savings and checking accounts, were consistent with those discussed at the institution level.

### Community Development Services

Chemung provided an adequate level of community development services in this assessment area. The bank provided 11 services, totaling 151 hours during the evaluation period that primarily addressed community services. This activity accounted for 2.8% of the bank’s total community development services activity.

The subsequent table summarizes the bank’s community development services by year and purpose.

<b>Community Development Services                      Non-Metropolitan Pennsylvania                      April 1, 2019 – June 30, 2023</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2019	0	2	1	0	<b>3</b>
2020	0	2	1	0	<b>3</b>
2021	0	0	3	0	<b>3</b>
2022	0	2	0	0	<b>2</b>
2023	0	0	0	0	<b>0</b>
<b>Total</b>	<b>0</b>	<b>6</b>	<b>5</b>	<b>0</b>	<b>11</b>
<b>% of Total</b>	<b>0</b>	<b>54.5</b>	<b>45.5</b>	<b>0</b>	<b>100.0</b>

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

- In 2019, 2020, 2021, one employee served on the loan review board of an economic development organization, providing financing needs to businesses. The organization served the Northern Tier of Pennsylvania.
- In 2021, one employee served on the board of a nonprofit that conducted community needs assessments and subsequent action plans to provide the needed community services to LMI individuals and families.
- In 2020 and 2022, one employee served as board member, regional leader, and member of the nominating committee for a nonprofit organization that provide social services for LMI individuals, which included free tax preparation and workforce development.



## **APPENDICES**

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

**Lending by Income Level of Geography**

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 21300 (Elmira, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	5.3	5.1	84	2.0	2.5	3	6.3	5.5	121	2.1	2.7	4.7
Moderate	1	2.6	10.7	73	1.7	7.0	0	0.0	8.9	0	0.0	6.1	8.5
Middle	18	47.4	52.1	1,850	43.4	48.3	24	50.0	54.3	2,583	44.1	50.9	56.3
Upper	17	44.7	32.1	2,255	52.9	42.2	21	43.8	31.3	3,153	53.8	40.4	30.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>4,262</b>	<b>100.0</b>	<b>100.0</b>	<b>48</b>	<b>100.0</b>	<b>100.0</b>	<b>5,857</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	13.6	3.0	218	11.2	1.8	0	0.0	1.6	0	0.0	0.7	4.7
Moderate	0	0.0	9.0	0	0.0	5.5	8	8.3	6.6	483	4.0	3.8	8.5
Middle	12	54.5	50.6	997	51.3	46.6	44	45.8	48.4	4,734	39.2	44.2	56.3
Upper	7	31.8	37.4	730	37.5	46.1	44	45.8	43.3	6,865	56.8	51.3	30.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>1,945</b>	<b>100.0</b>	<b>100.0</b>	<b>96</b>	<b>100.0</b>	<b>100.0</b>	<b>12,082</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.3	0	0.0	3.1	0	0.0	5.0	0	0.0	3.9	4.7
Moderate	1	50.0	8.2	15	37.5	4.9	0	0.0	7.9	0	0.0	6.6	8.5
Middle	0	0.0	52.2	0	0.0	51.6	0	0.0	51.4	0	0.0	55.0	56.3
Upper	1	50.0	35.3	25	62.5	40.4	1	100.0	35.7	40	100.0	34.5	30.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	22.2	0	0.0	1.4	0	0.0	27.3	0	0.0	25.3	34.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	15.4
Middle	1	100.0	77.8	13,000	100.0	98.6	0	0.0	45.5	0	0.0	71.1	40.0
Upper	0	0.0	0.0	0	0.0	0.0	1	100.0	27.3	215	100.0	3.6	10.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>13,000</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>215</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Total Home Mortgage Loans													Owner Occupied Units %
Low	5	7.9	4.6	302	1.6	2.4	3	2.1	3.8	121	0.7	3.3	4.7
Moderate	2	3.2	9.5	88	0.5	6.0	8	5.5	8.0	483	2.7	4.8	8.5
Middle	31	49.2	52.6	15,847	82.3	51.8	68	46.6	51.8	7,317	40.2	49.5	56.3
Upper	25	39.7	33.3	3,010	15.6	39.8	67	45.9	36.4	10,273	56.5	42.4	30.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>63</b>	<b>100.0</b>	<b>100.0</b>	<b>19,247</b>	<b>100.0</b>	<b>100.0</b>	<b>146</b>	<b>100.0</b>	<b>100.0</b>	<b>18,194</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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 21300 (Elmira, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	4	7.4	5.8	147	2.0	2.6	4	8.9	5.7	322	6.3	3.0	6.6
Moderate	4	7.4	11.2	313	4.4	8.0	4	8.9	13.4	342	6.7	10.3	11.3
Middle	30	55.6	51.5	3,381	47.1	48.3	25	55.6	58.2	2,765	53.8	57.4	60.3
Upper	16	29.6	31.5	3,334	46.5	41.1	12	26.7	22.7	1,711	33.3	29.3	21.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>7,175</b>	<b>100.0</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>5,140</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	2.3	2.4	68	1.3	2.2	2	7.7	7.1	513	17.9	6.2	6.6
Moderate	3	7.0	6.7	133	2.6	4.9	5	19.2	12.8	302	10.5	8.6	11.3
Middle	26	60.5	50.2	3,133	60.4	43.7	9	34.6	54.5	778	27.1	54.9	60.3
Upper	13	30.2	40.7	1,856	35.8	49.2	10	38.5	25.6	1,276	44.5	30.4	21.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>5,190</b>	<b>100.0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>2,869</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.5	0	0.0	4.3	0	0.0	1.5	0	0.0	1.3	6.6
Moderate	0	0.0	9.1	0	0.0	7.1	1	100.0	13.6	35	100.0	10.4	11.3
Middle	1	50.0	46.3	100	62.5	41.6	0	0.0	55.8	0	0.0	53.6	60.3
Upper	1	50.0	39.0	60	37.5	47.0	0	0.0	29.1	0	0.0	34.7	21.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Multifamily Loans													Multifamily Units %
Low	0	0.0	29.4	0	0.0	3.6	0	0.0	27.8	0	0.0	6.5	34.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	5.6	0	0.0	0.2	32.5
Middle	2	100.0	58.8	1,080	100.0	38.2	1	50.0	55.6	312	44.8	86.0	24.7
Upper	0	0.0	11.8	0	0.0	58.2	1	50.0	11.1	384	55.2	7.3	8.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,080</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>696</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Total Home Mortgage Loans													Owner Occupied Units %
Low	5	5.0	4.6	215	1.6	2.6	6	8.1	5.3	835	9.6	4.3	6.6
Moderate	7	6.9	9.3	446	3.3	6.3	10	13.5	13.2	679	7.8	7.3	11.3
Middle	59	58.4	50.7	7,694	56.6	45.6	35	47.3	57.0	3,855	44.1	64.6	60.3
Upper	30	29.7	35.3	5,250	38.6	45.5	23	31.1	24.6	3,371	38.6	23.8	21.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>101</b>	<b>100.0</b>	<b>100.0</b>	<b>13,605</b>	<b>100.0</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>8,740</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 21300 (Elmira, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	18	23.1	18.2	3,118	17.6	19.8	72	24.7	20.3	12,703	30.1	28.4	19.0
Moderate	17	21.8	12.0	4,734	26.8	21.4	54	18.6	14.4	10,414	24.7	19.0	12.3
Middle	21	26.9	40.1	4,155	23.5	27.6	93	32.0	38.5	9,014	21.4	27.9	42.5
Upper	22	28.2	28.7	5,660	32.0	30.8	72	24.7	26.7	10,029	23.8	24.5	26.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.4	0	0.0	0.2	0	0.0	0.2	
<b>Total</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>17,667</b>	<b>100.0</b>	<b>100.0</b>	<b>291</b>	<b>100.0</b>	<b>100.0</b>	<b>42,160</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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 21300 (Elmira, 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	46	20.9	17.8	6,816	24.1	21.9	13	18.6	14.1	3,529	18.2	17.5	19.4
Moderate	42	19.1	13.4	6,760	23.9	19.1	21	30.0	19.6	5,274	27.1	24.8	19.6
Middle	70	31.8	41.1	7,582	26.9	33.4	21	30.0	43.6	7,094	36.5	38.5	40.4
Upper	62	28.2	27.7	7,079	25.1	25.6	15	21.4	22.3	3,545	18.2	19.1	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.1	0	0.0	0.0	0	0.0	0.4	0	0.0	0.1	
<b>Total</b>	<b>220</b>	<b>100.0</b>	<b>100.0</b>	<b>28,237</b>	<b>100.0</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>19,442</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA New York													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.7	0	0.0	0.4	0	0.0	0.6	0	0.0	0.3	0.6
Moderate	1	2.4	5.6	129	2.2	4.0	0	0.0	6.6	0	0.0	4.9	5.1
Middle	37	90.2	71.6	5,123	87.7	69.0	35	81.4	69.3	5,464	72.9	66.0	72.0
Upper	3	7.3	22.0	592	10.1	26.6	8	18.6	23.5	2,032	27.1	28.8	22.3
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>5,844</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>7,496</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.7	0	0.0	0.5	1	1.0	0.2	62	0.4	0.1	0.6
Moderate	2	4.7	5.8	146	3.2	4.8	3	2.9	3.7	423	2.6	2.3	5.1
Middle	37	86.0	69.5	3,555	78.1	66.1	76	74.5	67.9	11,932	73.5	65.7	72.0
Upper	4	9.3	24.0	851	18.7	28.6	22	21.6	28.2	3,812	23.5	31.8	22.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>4,552</b>	<b>100.0</b>	<b>100.0</b>	<b>102</b>	<b>100.0</b>	<b>100.0</b>	<b>16,229</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.7	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	0.6
Moderate	0	0.0	5.5	0	0.0	4.5	0	0.0	4.0	0	0.0	2.0	5.1
Middle	4	57.1	72.3	131	66.2	74.0	1	100.0	73.1	30	100.0	72.7	72.0

Upper	3	42.9	21.6	67	33.8	20.9	0	0.0	22.8	0	0.0	25.4	22.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	7.7	0	0.0	1.4	0	0.0	3.4	0	0.0	0.1	3.6
Moderate	0	0.0	30.8	0	0.0	17.4	0	0.0	3.4	0	0.0	19.5	17.3
Middle	1	100.0	61.5	209	100.0	81.2	0	0.0	65.5	0	0.0	23.3	57.2
Upper	0	0.0	0.0	0	0.0	0.0	2	100.0	27.6	14,864	100.0	57.1	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>209</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>14,864</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.7	0	0.0	0.4	1	0.7	0.4	62	0.2	0.2	0.6
Moderate	3	3.3	6.0	275	2.5	4.8	3	2.0	5.1	423	1.1	4.9	5.1
Middle	79	85.9	71.2	9,018	83.5	68.7	112	75.7	69.5	17,426	45.1	63.0	72.0
Upper	10	10.9	22.1	1,510	14.0	26.1	32	21.6	25.0	20,708	53.6	31.8	22.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>92</b>	<b>100.0</b>	<b>100.0</b>	<b>10,803</b>	<b>100.0</b>	<b>100.0</b>	<b>148</b>	<b>100.0</b>	<b>100.0</b>	<b>38,619</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2020 FFIEC Census Data</i>													
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: Non-MSA New York</b>													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	1	2.0	0.8	95	1.3	0.4	0	0.0	0.4	0	0.0	0.2	0.4
Moderate	2	3.9	6.1	125	1.7	4.4	8	21.6	13.7	1,021	18.0	10.5	9.5
Middle	42	82.4	70.3	6,215	86.1	66.8	23	62.2	59.8	3,778	66.6	59.0	65.6
Upper	6	11.8	22.8	786	10.9	28.4	6	16.2	26.1	875	15.4	30.3	24.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>7,221</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>5,674</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	5.5	0.8	176	2.1	0.9	0	0.0	0.9	0	0.0	0.6	0.4
Moderate	1	1.8	4.1	75	0.9	3.3	5	11.6	10.4	349	7.1	8.6	9.5
Middle	41	74.5	67.6	6,631	79.9	63.3	32	74.4	64.7	3,798	76.8	65.2	65.6

Upper	10	18.2	27.5	1,413	17.0	32.5	6	14.0	23.9	798	16.1	25.6	24.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>8,295</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>4,945</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.5	0	0.0	0.2	0	0.0	0.5	0	0.0	0.2	0.4
Moderate	0	0.0	3.2	0	0.0	1.9	0	0.0	8.8	0	0.0	7.9	9.5
Middle	1	33.3	70.4	75	55.6	69.4	1	100.0	62.1	60	100.0	62.5	65.6
Upper	2	66.7	26.0	60	44.4	28.5	0	0.0	28.7	0	0.0	29.5	24.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	1	50.0	2.9	595	71.9	1.9	5.1
Moderate	0	0.0	3.3	0	0.0	3.1	0	0.0	23.5	0	0.0	21.5	21.6
Middle	0	0.0	76.7	0	0.0	73.8	0	0.0	44.1	0	0.0	52.0	55.0
Upper	1	100.0	20.0	600	100.0	23.1	1	50.0	29.4	232	28.1	24.6	18.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>600</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>827</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	4	3.6	0.8	271	1.7	0.6	1	1.2	0.6	595	5.2	0.4	0.4
Moderate	3	2.7	5.1	200	1.2	3.9	13	15.7	12.0	1,370	11.9	10.3	9.5
Middle	84	76.4	69.1	12,921	79.5	65.8	56	67.5	61.5	7,636	66.4	60.4	65.6
Upper	19	17.3	25.0	2,859	17.6	29.7	13	15.7	26.0	1,905	16.6	29.0	24.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>16,251</b>	<b>100.0</b>	<b>100.0</b>	<b>83</b>	<b>100.0</b>	<b>100.0</b>	<b>11,506</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: Non-MSA New York													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	2	4.8	2.3	350	5.7	2.1	9	3.8	2.9	1,742	10.2	4.1	2.4
Moderate	10	23.8	7.0	1,318	21.5	8.8	23	9.8	6.7	2,188	12.8	10.7	6.6
Middle	27	64.3	64.1	3,981	65.0	61.6	161	68.5	65.5	9,459	55.1	57.9	68.1
Upper	3	7.1	25.1	480	7.8	26.9	42	17.9	24.5	3,769	22.0	27.1	22.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.5	0	0.0	0.6	0	0.0	0.4	0	0.0	0.2	
<b>Total</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>6,129</b>	<b>100.0</b>	<b>100.0</b>	<b>235</b>	<b>100.0</b>	<b>100.0</b>	<b>17,158</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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: Non-MSA New York													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	8	3.6	2.5	960	6.3	4.1	5	12.2	2.2	480	6.2	10.8	2.4
Moderate	19	8.5	6.7	1,642	10.8	13.1	6	14.6	12.9	1,073	13.8	12.0	14.5
Middle	167	74.9	65.2	9,769	64.1	56.6	22	53.7	60.2	4,317	55.6	47.9	59.6
Upper	29	13.0	25.1	2,861	18.8	26.1	8	19.5	24.0	1,898	24.4	29.1	23.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.2	0	0.0	0.7	0	0.0	0.2	
<b>Total</b>	<b>223</b>	<b>100.0</b>	<b>100.0</b>	<b>15,232</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>7,768</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													



<b>Low</b>	1	4.5	3.0	37	0.5	1.6	2	5.4	3.0	427	4.3	1.7	2.9
<b>Moderate</b>	2	9.1	14.7	444	6.6	9.9	5	13.5	13.5	838	8.4	9.3	12.7
<b>Middle</b>	11	50.0	51.7	2,129	31.4	51.7	18	48.6	53.5	4,352	43.5	53.2	52.4
<b>Upper</b>	8	36.4	30.5	4,166	61.5	36.8	12	32.4	29.9	4,385	43.8	35.8	32.0
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	22	100.0	100.0	6,776	100.0	100.0	37	100.0	100.0	10,002	100.0	100.0	100.0
<b>Refinance Loans</b>													
<b>Low</b>	6	14.6	1.7	613	5.7	1.0	4	2.7	1.1	1,433	3.2	0.7	2.9
<b>Moderate</b>	2	4.9	9.1	468	4.3	6.3	12	8.0	7.2	1,517	3.4	5.0	12.7
<b>Middle</b>	11	26.8	52.6	2,377	22.0	50.4	66	44.0	51.8	17,729	39.8	50.0	52.4
<b>Upper</b>	22	53.7	36.5	7,328	67.9	42.3	68	45.3	39.9	23,888	53.6	44.3	32.0
<b>Unknown</b>	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	41	100.0	100.0	10,786	100.0	100.0	150	100.0	100.0	44,567	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	0	0.0	2.0	0	0.0	2.0	0	0.0	1.2	0	0.0	0.9	2.9
<b>Moderate</b>	0	0.0	9.0	0	0.0	7.1	0	0.0	8.0	0	0.0	6.4	12.7
<b>Middle</b>	2	100.0	51.5	197	100.0	52.2	1	50.0	53.3	118	73.8	52.2	52.4
<b>Upper</b>	0	0.0	37.6	0	0.0	38.6	1	50.0	37.5	42	26.3	40.5	32.0
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	2	100.0	100.0	197	100.0	100.0	2	100.0	100.0	160	100.0	100.0	100.0
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
<b>Low</b>	0	0.0	12.1	0	0.0	2.0	2	20.0	14.5	1,900	8.3	12.5	13.2
<b>Moderate</b>	3	33.3	24.3	6,346	15.5	10.5	2	20.0	20.8	3,770	16.5	10.8	18.0
<b>Middle</b>	2	22.2	39.3	12,952	31.6	54.8	4	40.0	47.8	9,500	41.6	48.6	41.7
<b>Upper</b>	4	44.4	22.1	21,655	52.9	27.1	2	20.0	15.1	7,685	33.6	27.9	26.9
<b>Unknown</b>	0	0.0	2.1	0	0.0	5.6	0	0.0	1.9	0	0.0	0.2	0.3
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	9	100.0	100.0	40,953	100.0	100.0	10	100.0	100.0	22,855	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
<b>Low</b>	7	9.5	2.6	650	1.1	1.5	8	4.0	2.1	3,760	4.8	2.1	2.9
<b>Moderate</b>	7	9.5	12.4	7,258	12.4	9.1	19	9.5	10.4	6,125	7.9	7.6	12.7
<b>Middle</b>	26	35.1	51.8	17,655	30.1	51.9	89	44.7	52.5	31,699	40.9	51.3	52.4
<b>Upper</b>	34	45.9	33.2	33,149	56.5	36.5	83	41.7	34.9	36,000	46.4	39.0	32.0
<b>Unknown</b>	0	0.0	0.0	0	0.0	1.0	0	0.0	0.1	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	74	100.0	100.0	58,712	100.0	100.0	199	100.0	100.0	77,584	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 10580 (Albany-Schenectady-Troy, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	3	5.2	3.8	357	2.0	2.3	1	2.4	5.3	120	1.0	3.1	3.4
Moderate	9	15.5	15.7	1,917	10.6	11.0	6	14.6	13.1	1,542	12.4	9.7	9.9
Middle	33	56.9	51.8	9,304	51.3	51.9	21	51.2	48.8	5,782	46.5	47.8	50.7
Upper	13	22.4	28.6	6,569	36.2	34.8	13	31.7	32.3	5,002	40.2	39.1	35.8
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.4	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	
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>18,147</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>12,446</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	5	6.8	1.6	682	3.9	1.1	0	0.0	3.8	0	0.0	2.4	3.4
Moderate	14	18.9	9.6	2,287	13.0	6.7	2	7.7	10.8	431	4.7	8.8	9.9
Middle	35	47.3	52.6	8,261	47.1	51.3	13	50.0	48.9	4,769	52.4	47.1	50.7
Upper	20	27.0	36.2	6,307	36.0	40.9	11	42.3	36.0	3,898	42.8	41.3	35.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.4	0	0.0	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>17,537</b>	<b>100.0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>9,098</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.0	0	0.0	1.6	0	0.0	2.7	0	0.0	2.0	3.4
Moderate	0	0.0	10.0	0	0.0	8.1	0	0.0	7.1	0	0.0	5.9	9.9
Middle	1	100.0	51.1	66	100.0	51.8	0	0.0	48.8	0	0.0	45.7	50.7
Upper	0	0.0	36.9	0	0.0	38.4	0	0.0	41.4	0	0.0	46.2	35.8
Unknown	0	0.0	0.0	0	0.0	0.0	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	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	17.6	0	0.0	13.0	1	5.6	13.0	520	0.4	2.4	10.9
Moderate	4	40.0	27.8	6,350	11.7	15.6	4	22.2	19.9	10,541	7.6	13.4	17.1
Middle	3	30.0	41.5	28,942	53.3	47.5	6	33.3	45.9	44,788	32.3	52.4	46.0
Upper	3	30.0	11.9	19,020	35.0	23.8	5	27.8	13.9	60,489	43.7	26.6	22.4
Unknown	0	0.0	1.1	0	0.0	0.1	2	11.1	7.4	22,215	16.0	5.1	3.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>54,312</b>	<b>100.0</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>138,553</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	8	5.6	2.7	1,039	1.2	2.8	2	2.4	4.4	640	0.4	2.7	3.4
Moderate	27	18.9	12.5	10,554	11.7	9.6	12	14.1	11.4	12,514	7.8	9.9	9.9
Middle	72	50.3	52.0	46,573	51.7	51.2	40	47.1	48.9	55,339	34.6	48.4	50.7
Upper	36	25.2	32.7	31,896	35.4	36.3	29	34.1	34.9	69,389	43.3	37.9	35.8

Unknown	0	0.0	0.1	0	0.0	0.0	2	2.4	0.4	22,215	13.9	1.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	143	100.0	100.0	90,062	100.0	100.0	85	100.0	100.0	160,097	100.0	100.0	100.0

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.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	31	19.5	8.4	8,608	19.8	10.2	45	8.9	9.0	8,250	9.9	9.2	9.5
Moderate	6	3.8	9.9	2,665	6.1	10.0	28	5.6	11.1	6,141	7.4	11.5	11.6
Middle	52	32.7	47.3	14,833	34.2	45.5	180	35.7	46.2	28,555	34.3	45.4	47.3
Upper	70	44.0	32.6	17,300	39.9	33.2	249	49.4	33.1	39,925	48.0	33.4	31.1
Unknown	0	0.0	0.2	0	0.0	0.5	2	0.4	0.5	329	0.4	0.4	0.5
Tract-Unk	0	0.0	1.5	0	0.0	0.5	0	0.0	0.2	0	0.0	0.1	
<b>Total</b>	159	100.0	100.0	43,406	100.0	100.0	504	100.0	100.0	83,200	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 10580 (Albany-Schenectady-Troy, 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	30	8.0	10.7	7,462	10.6	9.8	7	4.4	5.5	2,562	5.2	6.0	5.4
Moderate	24	6.4	10.9	6,866	9.7	11.9	18	11.3	9.0	5,858	12.0	7.8	9.5
Middle	158	42.1	45.5	23,058	32.7	44.8	83	51.9	46.9	24,001	49.0	51.0	48.7
Upper	162	43.2	32.2	32,751	46.5	33.0	49	30.6	30.4	15,250	31.1	29.4	29.5
Unknown	1	0.3	0.4	316	0.4	0.4	3	1.9	7.8	1,330	2.7	5.7	7.0
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.5	0	0.0	0.2	
<b>Total</b>	375	100.0	100.0	70,453	100.0	100.0	160	100.0	100.0	49,001	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.

Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 15380 (Buffalo-Cheektowaga, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	5.6	0	0.0	3.5	0	0.0	5.1	0	0.0	3.2	5.8
Moderate	0	0.0	10.6	0	0.0	7.7	0	0.0	12.5	0	0.0	9.5	12.1
Middle	0	0.0	44.8	0	0.0	40.2	3	50.0	46.8	981	55.5	42.0	46.4
Upper	1	100.0	38.8	150	100.0	48.6	3	50.0	35.1	788	44.5	44.9	35.2
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.5	0	0.0	0.4	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,769</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	12.5	2.8	94	6.9	1.8	0	0.0	3.7	0	0.0	2.6	5.8
Moderate	0	0.0	7.2	0	0.0	4.8	0	0.0	10.4	0	0.0	7.6	12.1
Middle	1	12.5	40.4	113	8.3	33.3	4	66.7	46.6	1,409	63.5	40.9	46.4
Upper	6	75.0	49.6	1,149	84.7	59.4	2	33.3	39.0	810	36.5	48.7	35.2
Unknown	0	0.0	0.0	0	0.0	0.7	0	0.0	0.3	0	0.0	0.2	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,356</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>2,219</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.3	0	0.0	3.6	0	0.0	4.5	0	0.0	3.3	5.8
Moderate	0	0.0	9.8	0	0.0	7.2	0	0.0	8.3	0	0.0	6.4	12.1
Middle	0	0.0	38.7	0	0.0	33.8	0	0.0	44.0	0	0.0	38.5	46.4
Upper	0	0.0	46.3	0	0.0	55.4	0	0.0	42.8	0	0.0	51.6	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.2	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	14.1	0	0.0	4.6	1	33.3	20.3	6,150	51.3	7.2	13.2
Moderate	1	50.0	19.7	355	33.6	7.5	0	0.0	20.3	0	0.0	29.6	19.0
Middle	0	0.0	37.4	0	0.0	37.9	0	0.0	34.0	0	0.0	31.1	37.0
Upper	1	50.0	26.8	700	66.4	43.5	2	66.7	24.8	5,850	48.8	31.5	29.1
Unknown	0	0.0	2.0	0	0.0	6.5	0	0.0	0.7	0	0.0	0.6	1.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,055</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>12,000</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	1	9.1	4.3	94	3.7	2.9	1	6.7	4.6	6,150	38.5	3.5	5.8
Moderate	1	9.1	9.0	355	13.9	6.5	0	0.0	11.2	0	0.0	11.6	12.1
Middle	1	9.1	42.2	113	4.4	36.9	7	46.7	46.2	2,390	14.9	40.0	46.4
Upper	8	72.7	44.4	1,999	78.1	52.7	7	46.7	37.6	7,448	46.6	44.5	35.2

Unknown	0	0.0	0.1	0	0.0	1.0	0	0.0	0.4	0	0.0	0.4	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>2,561</b>	<b>100.0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>15,988</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 15380 (Buffalo-Cheektowaga, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	10.4	0	0.0	10.1	1	25.0	8.6	537	21.1	7.4	7.7
Moderate	0	0.0	10.7	0	0.0	11.8	0	0.0	12.7	0	0.0	13.5	12.7
Middle	5	41.7	33.4	2,005	34.3	34.6	1	25.0	40.1	10	0.4	40.1	42.2
Upper	7	58.3	42.2	3,840	65.7	37.4	2	50.0	36.2	2,000	78.5	36.3	35.1
Unknown	0	0.0	3.1	0	0.0	6.1	0	0.0	2.1	0	0.0	2.6	2.3
Tract-Unk	0	0.0	0.2	0	0.0	0.0	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>5,845</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>2,547</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 13780 (Binghamton, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	2.1	0	0.0	1.2	0	0.0	2.2	0	0.0	1.3	2.7
Moderate	0	0.0	9.9	0	0.0	6.6	2	10.5	10.5	150	7.3	7.4	9.3
Middle	10	71.4	56.7	1,053	70.5	54.3	12	63.2	54.1	1,132	55.4	52.4	60.1
Upper	4	28.6	31.4	441	29.5	37.9	5	26.3	33.2	761	37.2	39.0	27.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>1,494</b>	<b>100.0</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>2,043</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	4.5	1.5	53	1.8	0.8	1	1.8	1.0	1,475	15.9	1.1	2.7
Moderate	2	9.1	6.6	116	4.0	4.4	1	1.8	5.2	50	0.5	3.1	9.3
Middle	16	72.7	59.5	2,326	79.3	56.3	32	58.2	56.8	4,665	50.3	54.3	60.1
Upper	3	13.6	32.3	440	15.0	38.5	21	38.2	37.1	3,076	33.2	41.5	27.9

Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,935</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>9,266</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.3	0	0.0	0.7	0	0.0	1.3	0	0.0	1.6	2.7
Moderate	0	0.0	7.6	0	0.0	6.9	0	0.0	8.0	0	0.0	5.6	9.3
Middle	1	100.0	59.3	50	100.0	57.9	0	0.0	56.6	0	0.0	54.2	60.1
Upper	0	0.0	31.8	0	0.0	34.4	0	0.0	34.1	0	0.0	38.6	27.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	17.9	0	0.0	3.9	1	33.3	18.2	614	20.1	9.9	19.3
Moderate	0	0.0	17.9	0	0.0	13.3	0	0.0	18.2	0	0.0	9.4	22.6
Middle	1	100.0	59.0	187	100.0	77.0	2	66.7	48.5	2,437	79.9	74.2	45.1
Upper	0	0.0	5.1	0	0.0	5.8	0	0.0	15.2	0	0.0	6.5	13.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>187</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>3,051</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	1	2.6	2.0	53	1.1	1.3	2	2.6	1.9	2,089	14.5	2.0	2.7
Moderate	2	5.3	9.2	116	2.5	6.8	3	3.9	8.9	200	1.4	6.3	9.3
Middle	28	73.7	57.7	3,616	77.5	56.6	46	59.7	55.5	8,234	57.3	55.0	60.1
Upper	7	18.4	31.2	881	18.9	35.3	26	33.8	33.7	3,837	26.7	36.6	27.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>4,666</b>	<b>100.0</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>	<b>100.0</b>	<b>14,360</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
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.													

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: MSA 13780 (Binghamton, NY)</b>													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	%	\$(000)	%	#	%	\$(000)	%	\$(000)	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	2.8	0	0.0	1.6	0	0.0	1.2	0	0.0	0.8	1.1
Moderate	2	8.7	11.9	389	11.6	8.8	4	19.0	17.4	277	11.5	12.3	14.7
Middle	16	69.6	55.7	2,184	65.0	54.5	14	66.7	45.6	1,725	71.9	42.5	49.3
Upper	5	21.7	29.6	787	23.4	35.1	3	14.3	35.6	398	16.6	44.2	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.3	0.1

Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>3,360</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>2,400</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	1.5	0	0.0	0.9	0	0.0	1.0	0	0.0	0.7	1.1
Moderate	2	5.6	7.0	221	4.8	4.8	0	0.0	15.3	0	0.0	11.8	14.7
Middle	26	72.2	55.1	3,416	73.7	52.8	7	77.8	45.8	551	60.3	43.3	49.3
Upper	8	22.2	36.5	997	21.5	41.5	2	22.2	37.8	363	39.7	44.1	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>4,634</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>914</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.2	0	0.0	0.6	0	0.0	0.6	0	0.0	0.5	1.1
Moderate	0	0.0	7.7	0	0.0	7.2	0	0.0	9.8	0	0.0	6.8	14.7
Middle	2	66.7	52.5	35	58.3	50.1	1	100.0	46.0	77	100.0	43.2	49.3
Upper	1	33.3	38.6	25	41.7	42.1	0	0.0	43.4	0	0.0	49.3	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	32.6	0	0.0	11.8	0	0.0	4.2	0	0.0	4.8	16.2
Moderate	0	0.0	14.0	0	0.0	26.5	2	50.0	47.9	247	11.4	15.5	26.9
Middle	0	0.0	51.2	0	0.0	61.3	0	0.0	33.3	0	0.0	29.8	31.4
Upper	0	0.0	2.3	0	0.0	0.4	0	0.0	8.3	0	0.0	46.2	21.8
Unknown	0	0.0	0.0	0	0.0	0.0	2	50.0	6.3	1,912	88.6	3.6	3.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>2,159</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	2.4	0	0.0	2.3	0	0.0	1.1	0	0.0	1.1	1.1
Moderate	4	6.5	9.7	610	7.6	8.9	6	17.1	16.1	524	9.4	12.2	14.7
Middle	44	71.0	55.5	5,635	70.0	54.6	22	62.9	45.9	2,353	42.4	41.6	49.3
Upper	14	22.6	32.4	1,809	22.5	34.2	5	14.3	36.7	761	13.7	44.6	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	2	5.7	0.3	1,912	34.5	0.5	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>8,054</b>	<b>100.0</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>100.0</b>	<b>5,550</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<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>													

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 13780 (Binghamton, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	9.6	0	0.0	12.0	4	4.4	9.8	144	2.0	15.2	9.4
Moderate	1	3.6	12.0	180	3.4	14.3	5	5.6	12.5	271	3.7	12.7	11.8
Middle	20	71.4	56.6	3,907	74.7	59.3	64	71.1	58.1	6,208	85.2	58.1	58.6
Upper	7	25.0	20.5	1,142	21.8	13.9	17	18.9	19.3	661	9.1	14.0	20.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	0.6	0	0.0	0.3	0	0.0	0.1	
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>5,229</b>	<b>100.0</b>	<b>100.0</b>	<b>90</b>	<b>100.0</b>	<b>100.0</b>	<b>7,284</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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 13780 (Binghamton, 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	3	3.8	7.8	179	2.6	10.3	0	0.0	7.9	0	0.0	6.7	9.5
Moderate	5	6.4	13.1	179	2.6	14.1	6	28.6	15.8	470	10.4	15.1	16.4
Middle	51	65.4	57.8	4,642	66.9	58.0	6	28.6	43.9	1,760	38.8	41.1	44.0
Upper	19	24.4	20.9	1,937	27.9	17.5	9	42.9	31.1	2,311	50.9	36.5	29.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.9	0	0.0	0.5	0.9
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	
<b>Total</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>6,937</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>4,541</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 27060 (Ithaca, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													



Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.6	0	0.0	8.3	2	15.4	9.8	370	12.2	8.5	12.2
Middle	5	83.3	68.1	777	78.2	63.4	10	76.9	67.2	2,302	75.8	61.2	70.6
Upper	1	16.7	20.6	216	21.8	26.7	1	7.7	22.7	366	12.0	30.0	17.0
Unknown	0	0.0	0.7	0	0.0	1.7	0	0.0	0.2	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	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>993</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>3,038</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	10.5	13.3	206	5.3	11.2	5	15.2	13.2	826	14.7	9.5	12.2
Middle	14	73.7	70.0	3,083	79.2	64.5	21	63.6	63.0	3,250	58.0	58.4	70.6
Upper	3	15.8	15.1	606	15.6	20.9	7	21.2	22.8	1,529	27.3	27.5	17.0
Unknown	0	0.0	1.6	0	0.0	3.4	0	0.0	1.0	0	0.0	4.6	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>3,895</b>	<b>100.0</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>5,605</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	12.9	0	0.0	10.8	1	33.3	12.3	35	49.3	15.0	12.2
Middle	2	100.0	70.6	195	100.0	61.7	2	66.7	78.9	36	50.7	69.9	70.6
Upper	0	0.0	16.5	0	0.0	27.5	0	0.0	8.8	0	0.0	15.1	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>195</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.1	0	0.0	0.1	0	0.0	12.0	0	0.0	5.2	11.8
Middle	0	0.0	35.7	0	0.0	6.9	1	50.0	32.0	416	16.5	6.7	34.8
Upper	0	0.0	39.3	0	0.0	69.9	0	0.0	16.0	0	0.0	20.6	37.4
Unknown	2	100.0	17.9	4,360	100.0	23.1	1	50.0	40.0	2,101	83.5	67.6	16.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>4,360</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>2,517</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	6.9	11.5	206	2.2	4.6	8	15.7	11.3	1,231	11.0	8.4	12.2
Middle	21	72.4	68.1	4,055	42.9	35.1	34	66.7	65.5	6,004	53.5	52.7	70.6
Upper	4	13.8	19.2	822	8.7	47.6	8	15.7	22.1	1,895	16.9	27.4	17.0
Unknown	2	6.9	1.2	4,360	46.2	12.6	1	2.0	1.1	2,101	18.7	11.6	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>9,443</b>	<b>100.0</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>11,231</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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 27060 (Ithaca, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	9.1	11.6	269	9.6	10.4	0	0.0	12.3	0	0.0	11.0	12.3
Middle	9	81.8	68.2	2,063	73.7	62.2	1	50.0	63.6	246	34.8	57.0	69.6
Upper	1	9.1	19.4	466	16.7	26.4	1	50.0	23.2	460	65.2	30.4	17.7
Unknown	0	0.0	0.7	0	0.0	1.1	0	0.0	0.8	0	0.0	1.5	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>2,798</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>706</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	7.7	9.2	216	3.6	8.5	0	0.0	11.8	0	0.0	7.8	12.3
Middle	19	73.1	70.6	3,500	58.5	66.1	3	50.0	67.4	430	54.4	52.6	69.6
Upper	4	15.4	19.2	1,695	28.3	23.1	2	33.3	19.5	210	26.6	23.8	17.7
Unknown	1	3.8	0.9	575	9.6	2.3	1	16.7	1.3	150	19.0	15.8	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>5,986</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>790</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.0	0	0.0	5.7	1	100.0	9.2	65	100.0	6.5	12.3
Middle	2	100.0	71.0	40	100.0	72.4	0	0.0	73.3	0	0.0	71.4	69.6
Upper	0	0.0	19.0	0	0.0	21.9	0	0.0	17.6	0	0.0	22.1	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.1	0	0.0	3.7	0	0.0	13.3	0	0.0	2.6	6.9
Middle	0	0.0	25.8	0	0.0	18.8	0	0.0	33.3	0	0.0	6.1	32.0
Upper	0	0.0	29.0	0	0.0	53.7	0	0.0	40.0	0	0.0	58.6	35.9
Unknown	1	100.0	29.0	4,530	100.0	23.7	0	0.0	13.3	0	0.0	32.6	25.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,530</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	7.5	10.9	485	3.6	8.0	1	11.1	11.6	65	4.2	8.9	12.3
Middle	30	75.0	68.6	5,603	42.0	50.4	4	44.4	65.8	676	43.3	50.3	69.6
Upper	5	12.5	19.4	2,161	16.2	33.5	3	33.3	21.6	670	42.9	32.1	17.7

Unknown	2	5.0	1.1	5,105	38.2	8.1	1	11.1	1.0	150	9.6	8.7	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>13,354</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,561</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 27060 (Ithaca, NY)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	33.3	16.7	170	32.0	17.2	14	15.1	16.4	1,378	24.6	22.4	16.1
Middle	4	26.7	50.1	148	27.8	45.0	48	51.6	47.9	1,427	25.5	35.9	50.0
Upper	6	40.0	29.0	214	40.2	30.1	28	30.1	32.7	2,704	48.4	36.6	31.6
Unknown	0	0.0	3.1	0	0.0	7.4	3	3.2	2.8	83	1.5	5.0	2.3
Tract-Unk	0	0.0	1.1	0	0.0	0.3	0	0.0	0.2	0	0.0	0.1	
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>532</b>	<b>100.0</b>	<b>100.0</b>	<b>93</b>	<b>100.0</b>	<b>100.0</b>	<b>5,592</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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 27060 (Ithaca, 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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	20.3	16.0	947	12.8	18.0	5	62.5	15.9	198	48.5	16.1	17.2
Middle	44	55.7	49.5	3,837	52.0	41.0	1	12.5	51.9	150	36.8	39.7	48.1
Upper	18	22.8	31.2	2,566	34.8	37.1	1	12.5	20.3	50	12.3	22.9	17.8
Unknown	1	1.3	3.1	22	0.3	3.9	1	12.5	11.7	10	2.5	21.2	17.0
Tract-Unk	0	0.0	0.1	0	0.0	0.0	0	0.0	0.2	0	0.0	0.1	
<b>Total</b>	<b>79</b>	<b>100.0</b>	<b>100.0</b>	<b>7,372</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>408</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Non-MSA Pennsylvania													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	7	100.0	88.3	947	100.0	87.4	10	90.9	88.6	1,473	92.5	87.3	87.9
Upper	0	0.0	11.7	0	0.0	12.6	1	9.1	11.4	120	7.5	12.7	12.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>947</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,593</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	18	78.3	89.2	2,041	55.1	86.1	26	81.3	88.3	3,422	72.9	87.3	87.9
Upper	5	21.7	10.8	1,663	44.9	13.9	6	18.8	11.7	1,269	27.1	12.7	12.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>3,704</b>	<b>100.0</b>	<b>100.0</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>4,691</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	88.2	122	100.0	90.4	0	0.0	89.1	0	0.0	87.1	87.9
Upper	0	0.0	11.8	0	0.0	9.6	0	0.0	10.9	0	0.0	12.9	12.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>122</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	92.9	0	0.0	97.9	95.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	7.1	0	0.0	2.1	4.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	26	83.9	88.8	3,110	65.2	87.4	36	83.7	88.7	4,895	77.9	87.6	87.9
Upper	5	16.1	11.2	1,663	34.8	12.6	7	16.3	11.3	1,389	22.1	12.4	12.1

Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>4,773</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>6,284</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: Non-MSA Pennsylvania</b>													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	10.4	0	0.0	8.8	6.6
Middle	9	90.0	91.3	787	86.6	90.2	9	100.0	86.4	1,329	100.0	87.3	89.6
Upper	1	10.0	8.8	122	13.4	9.8	0	0.0	3.2	0	0.0	3.9	3.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>909</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,329</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	5.0	0	0.0	4.7	6.6
Middle	18	90.0	87.5	2,387	86.6	86.6	7	77.8	90.6	626	84.8	90.4	89.6
Upper	2	10.0	12.5	370	13.4	13.4	2	22.2	4.4	112	15.2	4.9	3.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>2,757</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>738</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	7.1	0	0.0	6.6	6.6
Middle	1	100.0	90.5	20	100.0	93.4	0	0.0	89.6	0	0.0	90.2	89.6
Upper	0	0.0	9.5	0	0.0	6.6	0	0.0	3.3	0	0.0	3.1	3.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	7.1	0	0.0	37.7	10.1
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	92.9	0	0.0	62.3	87.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

<b>Total</b>	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	8.0	0	0.0	8.1	6.6
<b>Middle</b>	28	90.3	89.6	3,194	86.7	88.8	16	88.9	88.9	1,955	94.6	88.1	89.6
<b>Upper</b>	3	9.7	10.4	492	13.3	11.2	2	11.1	3.1	112	5.4	3.8	3.8
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	31	100.0	100.0	3,686	100.0	100.0	18	100.0	100.0	2,067	100.0	100.0	100.0

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.

**Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography**  
**Assessment Area: Non-MSA Pennsylvania**

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Middle</b>	33	100.0	85.1	4,709	100.0	86.4	66	97.1	90.7	9,254	95.1	90.0	88.7
<b>Upper</b>	0	0.0	14.1	0	0.0	13.3	2	2.9	9.1	477	4.9	9.9	11.3
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.9	0	0.0	0.3	0	0.0	0.1	0	0.0	0.1	
<b>Total</b>	33	100.0	100.0	4,709	100.0	100.0	68	100.0	100.0	9,731	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: Non-MSA Pennsylvania													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	2	8.0	4.3	119	2.5	1.7	7.3
Middle	38	100.0	88.5	7,876	100.0	86.2	22	88.0	92.6	4,441	93.3	94.1	89.6
Upper	0	0.0	11.1	0	0.0	13.6	1	4.0	2.7	200	4.2	4.0	3.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.4	0	0.0	0.2	0	0.0	0.4	0	0.0	0.1	
<b>Total</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>7,876</b>	<b>100.0</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>4,760</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

### Lending by Borrower Income Level

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 21300 (Elmira, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	5	13.2	15.3	343	8.0	8.6	5	10.4	12.4	299	5.1	7.6	22.9
Moderate	11	28.9	27.2	1,095	25.7	22.1	12	25.0	25.9	1,109	18.9	21.6	16.0
Middle	8	21.1	22.7	839	19.7	22.7	13	27.1	24.9	1,312	22.4	25.1	21.0
Upper	8	21.1	24.4	1,383	32.4	36.5	11	22.9	22.6	2,347	40.1	33.5	40.0
Unknown	6	15.8	10.4	602	14.1	10.1	7	14.6	14.2	790	13.5	12.2	0.0
<b>Total</b>	<b>38</b>	<b>100.0</b>	<b>100.0</b>	<b>4,262</b>	<b>100.0</b>	<b>100.0</b>	<b>48</b>	<b>100.0</b>	<b>100.0</b>	<b>5,857</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	9.1	12.4	68	3.5	7.3	2	2.1	4.1	81	0.7	1.7	22.9
Moderate	6	27.3	20.2	322	16.6	13.7	11	11.5	12.7	929	7.7	7.8	16.0
Middle	8	36.4	21.0	762	39.2	17.8	22	22.9	23.7	1,987	16.4	19.4	21.0
Upper	4	18.2	29.4	711	36.6	36.9	48	50.0	43.1	7,600	62.9	53.0	40.0
Unknown	2	9.1	17.0	82	4.2	24.3	13	13.5	16.4	1,485	12.3	18.1	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>1,945</b>	<b>100.0</b>	<b>100.0</b>	<b>96</b>	<b>100.0</b>	<b>100.0</b>	<b>12,082</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	7.6	0	0.0	5.9	0	0.0	2.9	0	0.0	4.2	22.9
Moderate	0	0.0	24.5	0	0.0	24.9	0	0.0	17.9	0	0.0	15.4	16.0
Middle	1	50.0	24.5	15	37.5	19.4	0	0.0	34.3	0	0.0	34.3	21.0
Upper	0	0.0	39.1	0	0.0	45.5	1	100.0	41.4	40	100.0	39.7	40.0

Unknown	1	50.0	4.3	25	62.5	4.3	0	0.0	3.6	0	0.0	6.3	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	7	11.3	13.2	411	6.6	8.1	7	4.8	7.9	380	2.1	4.6	22.9
Moderate	17	27.4	24.0	1,417	22.7	19.6	23	15.9	18.3	2,038	11.3	14.3	16.0
Middle	17	27.4	22.4	1,616	25.9	21.0	35	24.1	24.3	3,299	18.3	22.1	21.0
Upper	12	19.4	27.6	2,094	33.5	36.7	60	41.4	32.4	9,987	55.5	42.1	40.0
Unknown	9	14.5	12.8	709	11.3	14.6	20	13.8	17.0	2,275	12.7	16.9	0.0
<b>Total</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>6,247</b>	<b>100.0</b>	<b>100.0</b>	<b>145</b>	<b>100.0</b>	<b>100.0</b>	<b>17,979</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: MSA 21300 (Elmira, NY)</b>													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	4	7.4	8.0	364	5.1	4.5	9	20.0	11.8	617	12.0	6.9	23.3
Moderate	16	29.6	21.5	1,662	23.2	15.9	12	26.7	25.3	1,323	25.7	20.3	15.7
Middle	13	24.1	23.5	1,575	22.0	23.4	8	17.8	21.8	908	17.7	22.5	21.8
Upper	17	31.5	28.8	3,104	43.3	39.9	10	22.2	25.8	1,625	31.6	36.9	39.1
Unknown	4	7.4	18.2	470	6.6	16.4	6	13.3	15.3	667	13.0	13.4	0.0
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>7,175</b>	<b>100.0</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>5,140</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	4.7	6.6	84	1.6	3.0	3	11.5	9.0	88	3.1	5.6	23.3
Moderate	6	14.0	14.6	467	9.0	9.7	6	23.1	23.4	508	17.7	18.5	15.7
Middle	8	18.6	24.6	817	15.7	19.5	8	30.8	26.4	703	24.5	24.5	21.8
Upper	23	53.5	42.8	3,468	66.8	52.5	8	30.8	32.4	1,162	40.5	42.3	39.1
Unknown	4	9.3	11.4	354	6.8	15.3	1	3.8	8.7	408	14.2	9.0	0.0
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>5,190</b>	<b>100.0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>2,869</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	7.3	0	0.0	5.6	0	0.0	12.1	0	0.0	8.6	23.3
Moderate	1	50.0	22.6	100	62.5	18.5	0	0.0	20.4	0	0.0	17.4	15.7
Middle	1	50.0	29.3	60	37.5	23.3	1	100.0	26.7	35	100.0	26.0	21.8
Upper	0	0.0	37.8	0	0.0	49.9	0	0.0	38.3	0	0.0	46.3	39.1
Unknown	0	0.0	3.0	0	0.0	2.7	0	0.0	2.4	0	0.0	1.6	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	6	6.1	7.4	448	3.6	4.0	12	16.7	10.8	705	8.8	6.6	23.3
Moderate	23	23.2	18.5	2,229	17.8	13.5	18	25.0	23.7	1,831	22.8	19.6	15.7



Middle	22	22.2	24.1	2,452	19.6	21.8	17	23.6	23.4	1,646	20.5	23.1	21.8
Upper	40	40.4	34.8	6,572	52.5	44.6	18	25.0	29.7	2,787	34.6	38.5	39.1
Unknown	8	8.1	15.2	824	6.6	16.2	7	9.7	12.4	1,075	13.4	12.3	0.0
Total	99	100.0	100.0	12,525	100.0	100.0	72	100.0	100.0	8,044	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.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 21300 (Elmira, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	26	33.3	37.2	2,973	16.8	29.1	74	25.4	33.7	3,947	9.4	16.8	88.3
Over \$1 Million	49	62.8		14,259	80.7		91	31.3		29,708	70.5		10.2
Revenue Unknown	3	3.8		435	2.5		126	43.3		8,505	20.2		1.5
Total	78	100.0		17,667	100.0		291	100.0		42,160	100.0		100.0
<b>By Loan Size</b>													
\$100,000 or Less	31	39.7	90.5	1,731	9.8	30.5	186	63.9	82.2	5,972	14.2	22.0	
\$100,001 - \$250,000	21	26.9	5.1	3,606	20.4	19.8	49	16.8	9.5	8,253	19.6	21.1	
\$250,001 - \$1 Million	26	33.3	4.4	12,330	69.8	49.7	56	19.2	8.3	27,935	66.3	56.9	
Total	78	100.0	100.0	17,667	100.0	100.0	291	100.0	100.0	42,160	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	17	65.4		783	26.3		66	89.2		1,691	42.8		
\$100,001 - \$250,000	6	23.1		958	32.2		6	8.1		1,059	26.8		
\$250,001 - \$1 Million	3	11.5		1,232	41.4		2	2.7		1,197	30.3		
Total	26	100.0		2,973	100.0		74	100.0		3,947	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 21300 (Elmira, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	85	38.6	42.9	5,030	17.8	18.8	25	35.7	52.8	3,697	19.0	26.6	88.7
Over \$1 Million	70	31.8		19,908	70.5		44	62.9		15,495	79.7		9.7
Revenue Unknown	65	29.5		3,299	11.7		1	1.4		250	1.3		1.6
<b>Total</b>	<b>220</b>	<b>100.0</b>		<b>28,237</b>	<b>100.0</b>		<b>70</b>	<b>100.0</b>		<b>19,442</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	150	68.2	88.4	4,788	17.0	30.1	25	35.7	90.7	1,587	8.2	29.2	
\$100,001 - \$250,000	32	14.5	6.4	5,515	19.5	21.8	18	25.7	5.7	3,450	17.7	25.6	
\$250,001 - \$1 Million	38	17.3	5.2	17,934	63.5	48.0	26	37.1	3.6	12,935	66.5	45.1	
<b>Total</b>	<b>220</b>	<b>100.0</b>	<b>100.0</b>	<b>28,237</b>	<b>100.0</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>19,442</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	75	88.2		2,077	41.3		13	52.0		668	18.1		
\$100,001 - \$250,000	6	7.1		1,035	20.6		8	32.0		1,534	41.5		
\$250,001 - \$1 Million	4	4.7		1,918	38.1		4	16.0		1,495	40.4		
<b>Total</b>	<b>85</b>	<b>100.0</b>		<b>5,030</b>	<b>100.0</b>		<b>25</b>	<b>100.0</b>		<b>3,697</b>	<b>100.0</b>		

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA New York													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	1	2.4	6.1	98	1.7	3.5	2	4.7	5.4	117	1.6	2.9	18.3
Moderate	12	29.3	22.3	1,021	17.5	16.4	5	11.6	21.2	423	5.6	15.2	16.6
Middle	9	22.0	25.4	953	16.3	23.2	7	16.3	23.2	841	11.2	20.8	21.8
Upper	18	43.9	35.1	3,716	63.6	46.6	29	67.4	36.9	6,115	81.6	48.5	43.3
Unknown	1	2.4	11.1	56	1.0	10.4	0	0.0	13.4	0	0.0	12.6	0.0
<b>Total</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>5,844</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>7,496</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	5	11.6	7.8	244	5.4	4.6	6	5.9	3.9	338	2.1	2.1	18.3
Moderate	7	16.3	17.7	388	8.5	12.4	10	9.8	13.0	1,087	6.7	8.2	16.6
Middle	14	32.6	27.8	1,519	33.4	23.0	19	18.6	22.7	1,700	10.5	16.8	21.8

Upper	17	39.5	39.2	2,401	52.7	50.2	61	59.8	50.2	11,986	73.9	61.4	43.3
Unknown	0	0.0	7.4	0	0.0	9.7	6	5.9	10.2	1,118	6.9	11.5	0.0
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>4,552</b>	<b>100.0</b>	<b>100.0</b>	<b>102</b>	<b>100.0</b>	<b>100.0</b>	<b>16,229</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	1	14.3	7.0	25	12.6	5.2	0	0.0	7.5	0	0.0	3.8	18.3
Moderate	2	28.6	16.1	27	13.6	11.6	0	0.0	14.8	0	0.0	9.1	16.6
Middle	2	28.6	26.6	85	42.9	23.3	0	0.0	24.5	0	0.0	19.8	21.8
Upper	2	28.6	48.2	61	30.8	58.1	1	100.0	51.1	30	100.0	63.7	43.3
Unknown	0	0.0	2.0	0	0.0	1.8	0	0.0	2.2	0	0.0	3.6	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	7	7.7	6.8	367	3.5	3.9	8	5.5	4.8	455	1.9	2.5	18.3
Moderate	21	23.1	19.5	1,436	13.6	14.7	15	10.3	16.5	1,510	6.4	11.6	16.6
Middle	25	27.5	25.8	2,557	24.1	22.8	26	17.8	22.1	2,541	10.7	18.6	21.8
Upper	37	40.7	37.2	6,178	58.3	47.5	91	62.3	42.1	18,131	76.3	53.6	43.3
Unknown	1	1.1	10.7	56	0.5	11.0	6	4.1	14.4	1,118	4.7	13.7	0.0
<b>Total</b>	<b>91</b>	<b>100.0</b>	<b>100.0</b>	<b>10,594</b>	<b>100.0</b>	<b>100.0</b>	<b>146</b>	<b>100.0</b>	<b>100.0</b>	<b>23,755</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Non-MSA New York</b>													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	5	9.8	6.8	548	7.6	3.7	4	10.8	6.5	348	6.1	3.5	18.6
Moderate	10	19.6	22.0	1,122	15.5	15.6	5	13.5	23.8	540	9.5	17.1	17.5
Middle	12	23.5	22.9	1,470	20.4	19.9	6	16.2	21.4	701	12.4	18.6	20.9
Upper	23	45.1	34.0	3,942	54.6	47.0	20	54.1	34.0	3,885	68.5	47.4	43.1
Unknown	1	2.0	14.3	139	1.9	13.7	2	5.4	14.4	200	3.5	13.4	0.0
<b>Total</b>	<b>51</b>	<b>100.0</b>	<b>100.0</b>	<b>7,221</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>5,674</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	5.5	5.8	159	1.9	3.1	5	11.6	8.4	329	6.7	4.5	18.6
Moderate	5	9.1	16.2	382	4.6	10.7	10	23.3	20.6	1,013	20.5	14.7	17.5
Middle	15	27.3	25.4	1,601	19.3	20.3	10	23.3	27.2	1,083	21.9	23.6	20.9
Upper	32	58.2	42.6	6,153	74.2	53.0	18	41.9	36.8	2,520	51.0	49.2	43.1
Unknown	0	0.0	10.0	0	0.0	12.8	0	0.0	7.0	0	0.0	8.0	0.0
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>8,295</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>4,945</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.8	0	0.0	3.5	0	0.0	5.5	0	0.0	3.8	18.6

Moderate	0	0.0	17.5	0	0.0	10.9	0	0.0	16.5	0	0.0	11.2	17.5
Middle	0	0.0	26.5	0	0.0	24.9	0	0.0	26.9	0	0.0	21.0	20.9
Upper	3	100.0	47.8	135	100.0	57.8	1	100.0	48.9	60	100.0	62.3	43.1
Unknown	0	0.0	2.4	0	0.0	2.9	0	0.0	2.1	0	0.0	1.7	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	8	7.3	6.3	707	4.5	3.5	9	11.1	7.0	677	6.3	3.8	18.6
Moderate	15	13.8	19.1	1,504	9.6	13.4	15	18.5	21.5	1,553	14.5	16.0	17.5
Middle	27	24.8	24.1	3,071	19.6	20.2	16	19.8	23.6	1,784	16.7	19.9	20.9
Upper	58	53.2	38.1	10,230	65.4	49.5	39	48.1	36.9	6,465	60.5	49.0	43.1
Unknown	1	0.9	12.4	139	0.9	13.4	2	2.5	10.9	200	1.9	11.4	0.0
<b>Total</b>	<b>109</b>	<b>100.0</b>	<b>100.0</b>	<b>15,651</b>	<b>100.0</b>	<b>100.0</b>	<b>81</b>	<b>100.0</b>	<b>100.0</b>	<b>10,679</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
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.													

<b>Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: Non-MSA New York</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	25	59.5	43.4	2,720	44.4	35.2	98	41.7	35.0	4,357	25.4	23.7	89.3
<b>Over \$1 Million</b>	16	38.1		3,399	55.5		41	17.4		7,934	46.2		8.1
<b>Revenue Unknown</b>	1	2.4		10	0.2		96	40.9		4,867	28.4		2.7
<b>Total</b>	<b>42</b>	<b>100.0</b>		<b>6,129</b>	<b>100.0</b>		<b>235</b>	<b>100.0</b>		<b>17,158</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	23	54.8	92.6	1,076	17.6	34.8	187	79.6	87.2	5,422	31.6	31.2	
<b>\$100,001 - \$250,000</b>	12	28.6	3.9	2,198	35.9	16.5	33	14.0	7.1	5,062	29.5	20.1	
<b>\$250,001 - \$1 Million</b>	7	16.7	3.4	2,855	46.6	48.7	15	6.4	5.7	6,674	38.9	48.7	
<b>Total</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>6,129</b>	<b>100.0</b>	<b>100.0</b>	<b>235</b>	<b>100.0</b>	<b>100.0</b>	<b>17,158</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	16	64.0		668	24.6		89	90.8		2,266	52.0		
<b>\$100,001 - \$250,000</b>	5	20.0		765	28.1		5	5.1		645	14.8		
<b>\$250,001 - \$1 Million</b>	4	16.0		1,287	47.3		4	4.1		1,446	33.2		
<b>Total</b>	<b>25</b>	<b>100.0</b>		<b>2,720</b>	<b>100.0</b>		<b>98</b>	<b>100.0</b>		<b>4,357</b>	<b>100.0</b>		
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: Non-MSA New York													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	104	46.6	46.4	4,299	28.2	33.8	15	36.6	55.5	1,412	18.2	46.9	89.3
Over \$1 Million	30	13.5		6,603	43.3		25	61.0		6,346	81.7		7.9
Revenue Unknown	89	39.9		4,330	28.4		1	2.4		10	0.1		2.9
<b>Total</b>	<b>223</b>	<b>100.0</b>		<b>15,232</b>	<b>100.0</b>		<b>41</b>	<b>100.0</b>		<b>7,768</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	181	81.2	90.8	4,883	32.1	34.8	22	53.7	93.2	1,030	13.3	33.6	
\$100,001 - \$250,000	29	13.0	5.6	5,196	34.1	21.7	10	24.4	3.3	1,804	23.2	14.1	
\$250,001 - \$1 Million	13	5.8	3.5	5,153	33.8	43.6	9	22.0	3.6	4,934	63.5	52.3	
<b>Total</b>	<b>223</b>	<b>100.0</b>	<b>100.0</b>	<b>15,232</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>7,768</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	93	89.4		1,985	46.2		11	73.3		383	27.1		
\$100,001 - \$250,000	9	8.7		1,584	36.8		2	13.3		254	18.0		
\$250,001 - \$1 Million	2	1.9		730	17.0		2	13.3		775	54.9		
<b>Total</b>	<b>104</b>	<b>100.0</b>		<b>4,299</b>	<b>100.0</b>		<b>15</b>	<b>100.0</b>		<b>1,412</b>	<b>100.0</b>		

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	1	4.5	8.4	80	1.2	4.6	2	5.4	12.4	389	3.9	7.6	19.5
Moderate	4	18.2	24.8	767	11.3	19.4	7	18.9	27.9	1,195	11.9	23.1	17.5
Middle	8	36.4	23.8	1,469	21.7	23.5	12	32.4	23.0	2,667	26.7	23.8	22.0
Upper	6	27.3	29.8	2,558	37.8	39.9	13	35.1	25.6	5,071	50.7	35.7	41.1
Unknown	3	13.6	13.2	1,902	28.1	12.5	3	8.1	11.0	680	6.8	9.7	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>6,776</b>	<b>100.0</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>10,002</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	2.4	8.4	108	1.0	4.5	5	3.3	6.5	741	1.7	3.5	19.5
Moderate	3	7.3	19.0	341	3.2	14.0	18	12.0	20.0	2,819	6.3	15.0	17.5
Middle	15	36.6	26.4	2,175	20.2	24.0	31	20.7	26.7	6,555	14.7	24.8	22.0

Upper	20	48.8	36.8	7,776	72.1	46.7	88	58.7	38.5	30,608	68.7	47.5	41.1
Unknown	2	4.9	9.4	386	3.6	10.8	8	5.3	8.4	3,844	8.6	9.1	0.0
<b>Total</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>10,786</b>	<b>100.0</b>	<b>100.0</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>44,567</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	7.7	0	0.0	5.5	0	0.0	7.8	0	0.0	5.9	19.5
Moderate	0	0.0	18.8	0	0.0	15.0	1	50.0	22.6	118	73.8	16.6	17.5
Middle	0	0.0	27.1	0	0.0	23.2	1	50.0	27.4	42	26.3	24.8	22.0
Upper	2	100.0	44.1	197	100.0	53.1	0	0.0	40.3	0	0.0	49.6	41.1
Unknown	0	0.0	2.3	0	0.0	3.2	0	0.0	1.9	0	0.0	3.1	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>197</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	2	3.1	8.1	188	1.1	4.6	7	3.7	8.8	1,130	2.1	5.4	19.5
Moderate	7	10.8	21.8	1,108	6.2	17.3	26	13.8	22.6	4,132	7.5	18.4	17.5
Middle	23	35.4	24.6	3,644	20.5	23.3	44	23.3	24.1	9,264	16.9	23.6	22.0
Upper	28	43.1	33.5	10,531	59.3	42.1	101	53.4	32.1	35,679	65.2	41.0	41.1
Unknown	5	7.7	12.0	2,288	12.9	12.6	11	5.8	12.4	4,524	8.3	11.6	0.0
<b>Total</b>	<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>17,759</b>	<b>100.0</b>	<b>100.0</b>	<b>189</b>	<b>100.0</b>	<b>100.0</b>	<b>54,729</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)</b>													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	4	6.9	10.5	689	3.8	6.3	1	2.4	10.6	120	1.0	6.1	20.8
Moderate	8	13.8	26.3	1,675	9.2	21.3	6	14.6	24.9	1,193	9.6	19.3	16.8
Middle	10	17.2	22.9	2,353	13.0	23.0	13	31.7	24.2	3,377	27.1	24.5	21.4
Upper	28	48.3	28.4	11,121	61.3	38.8	19	46.3	29.4	7,371	59.2	40.5	41.0
Unknown	8	13.8	11.8	2,309	12.7	10.6	2	4.9	11.0	385	3.1	9.6	0.0
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>100.0</b>	<b>18,147</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>12,446</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	1.4	7.1	130	0.7	4.1	0	0.0	11.5	0	0.0	7.4	20.8
Moderate	10	13.5	20.0	2,011	11.5	15.1	2	7.7	24.1	324	3.6	19.4	16.8
Middle	20	27.0	26.4	4,080	23.3	24.6	5	19.2	26.8	875	9.6	26.3	21.4
Upper	42	56.8	37.1	10,991	62.7	46.0	15	57.7	29.8	6,396	70.3	38.0	41.0
Unknown	1	1.4	9.4	325	1.9	10.2	4	15.4	7.8	1,503	16.5	8.9	0.0
<b>Total</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>17,537</b>	<b>100.0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>9,098</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	6.6	0	0.0	4.7	0	0.0	9.1	0	0.0	6.1	20.8

Moderate	0	0.0	19.3	0	0.0	17.3	0	0.0	21.3	0	0.0	17.1	16.8
Middle	1	100.0	27.2	66	100.0	23.6	0	0.0	29.2	0	0.0	26.2	21.4
Upper	0	0.0	45.2	0	0.0	51.8	0	0.0	38.3	0	0.0	46.4	41.0
Unknown	0	0.0	1.7	0	0.0	2.4	0	0.0	2.0	0	0.0	4.2	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	5	3.8	8.5	819	2.3	5.3	1	1.5	10.5	120	0.6	6.4	20.8
Moderate	18	13.5	22.4	3,686	10.3	18.2	8	11.9	23.6	1,517	7.0	19.0	16.8
Middle	31	23.3	24.7	6,499	18.2	23.5	18	26.9	25.7	4,252	19.7	24.9	21.4
Upper	70	52.6	33.7	22,112	61.9	42.3	34	50.7	31.3	13,767	63.9	40.4	41.0
Unknown	9	6.8	10.7	2,634	7.4	10.8	6	9.0	8.9	1,888	8.8	9.3	0.0
<b>Total</b>	<b>133</b>	<b>100.0</b>	<b>100.0</b>	<b>35,750</b>	<b>100.0</b>	<b>100.0</b>	<b>67</b>	<b>100.0</b>	<b>100.0</b>	<b>21,544</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
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.													

<b>Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY)</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	50	31.4	41.4	7,488	17.3	28.7	162	32.1	34.3	13,301	16.0	20.0	89.8
<b>Over \$1 Million</b>	104	65.4		35,664	82.2		199	39.5		55,879	67.2		8.9
<b>Revenue Unknown</b>	5	3.1		254	0.6		143	28.4		14,020	16.9		1.3
<b>Total</b>	159	100.0		43,406	100.0		504	100.0		83,200	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	66	41.5	94.2	3,366	7.8	37.0	287	56.9	86.3	10,803	13.0	29.0	
<b>\$100,001 - \$250,000</b>	37	23.3	2.7	6,928	16.0	13.5	109	21.6	7.7	18,402	22.1	20.9	
<b>\$250,001 - \$1 Million</b>	56	35.2	3.1	33,112	76.3	49.5	108	21.4	6.0	53,995	64.9	50.1	
<b>Total</b>	159	100.0	100.0	43,406	100.0	100.0	504	100.0	100.0	83,200	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	29	58.0		1,298	17.3		126	77.8		3,671	27.6		
<b>\$100,001 - \$250,000</b>	13	26.0		2,434	32.5		22	13.6		3,903	29.3		
<b>\$250,001 - \$1 Million</b>	8	16.0		3,756	50.2		14	8.6		5,727	43.1		
<b>Total</b>	50	100.0		7,488	100.0		162	100.0		13,301	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 10580 (Albany-Schenectady-Troy, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
\$1 Million or Less	168	44.8	42.1	19,521	27.7	24.0	55	34.4	49.0	13,879	28.3	33.4	90.1
Over \$1 Million	136	36.3		44,394	63.0		99	61.9		33,036	67.4		8.4
Revenue Unknown	71	18.9		6,538	9.3		6	3.8		2,086	4.3		1.4
<b>Total</b>	<b>375</b>	<b>100.0</b>		<b>70,453</b>	<b>100.0</b>		<b>160</b>	<b>100.0</b>		<b>49,001</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	199	53.1	91.1	6,954	9.9	33.8	51	31.9	94.4	2,936	6.0	39.1	
\$100,001 - \$250,000	76	20.3	5.0	12,941	18.4	19.0	47	29.4	2.8	8,503	17.4	14.1	
\$250,001 - \$1 Million	100	26.7	3.9	50,558	71.8	47.1	62	38.8	2.8	37,562	76.7	46.8	
<b>Total</b>	<b>375</b>	<b>100.0</b>	<b>100.0</b>	<b>70,453</b>	<b>100.0</b>	<b>100.0</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>49,001</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	123	73.2		3,875	19.9		26	47.3		1,278	9.2		
\$100,001 - \$250,000	18	10.7		3,127	16.0		12	21.8		2,147	15.5		
\$250,001 - \$1 Million	27	16.1		12,519	64.1		17	30.9		10,454	75.3		
<b>Total</b>	<b>168</b>	<b>100.0</b>		<b>19,521</b>	<b>100.0</b>		<b>55</b>	<b>100.0</b>		<b>13,879</b>	<b>100.0</b>		

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.

Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 15380 (Buffalo-Cheektowaga, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	8.3	0	0.0	4.9	0	0.0	8.3	0	0.0	4.7	22.3
Moderate	0	0.0	23.7	0	0.0	18.1	1	16.7	23.3	315	17.8	17.6	16.3
Middle	0	0.0	21.8	0	0.0	20.5	1	16.7	22.3	306	17.3	21.0	20.6
Upper	1	100.0	30.1	150	100.0	40.6	4	66.7	30.0	1,148	64.9	40.8	40.9
Unknown	0	0.0	16.1	0	0.0	15.9	0	0.0	16.2	0	0.0	16.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,769</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	12.5	6.7	145	10.7	3.6	0	0.0	10.3	0	0.0	6.0	22.3
Moderate	1	12.5	17.9	113	8.3	12.5	1	16.7	23.8	297	13.4	18.3	16.3
Middle	0	0.0	25.3	0	0.0	22.1	1	16.7	26.1	225	10.1	24.9	20.6



<b>Upper</b>	3	37.5	39.8	514	37.9	49.8	4	66.7	32.1	1,697	76.5	42.5	40.9
<b>Unknown</b>	3	37.5	10.4	584	43.1	12.1	0	0.0	7.7	0	0.0	8.2	0.0
<b>Total</b>	8	100.0	100.0	1,356	100.0	100.0	6	100.0	100.0	2,219	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	0	0.0	8.9	0	0.0	6.3	0	0.0	9.3	0	0.0	6.2	22.3
<b>Moderate</b>	0	0.0	19.4	0	0.0	15.2	0	0.0	19.5	0	0.0	15.5	16.3
<b>Middle</b>	0	0.0	23.0	0	0.0	21.6	0	0.0	25.1	0	0.0	21.7	20.6
<b>Upper</b>	0	0.0	43.4	0	0.0	51.0	0	0.0	41.7	0	0.0	52.6	40.9
<b>Unknown</b>	0	0.0	5.3	0	0.0	5.9	0	0.0	4.4	0	0.0	4.1	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	1	11.1	7.5	145	9.6	4.3	0	0.0	9.0	0	0.0	5.1	22.3
<b>Moderate</b>	1	11.1	20.3	113	7.5	15.3	2	16.7	22.5	612	15.3	17.5	16.3
<b>Middle</b>	0	0.0	23.2	0	0.0	21.1	2	16.7	23.7	531	13.3	21.9	20.6
<b>Upper</b>	4	44.4	35.6	664	44.1	45.0	8	66.7	32.6	2,845	71.3	42.3	40.9
<b>Unknown</b>	3	33.3	13.3	584	38.8	14.1	0	0.0	12.2	0	0.0	13.2	0.0
<b>Total</b>	9	100.0	100.0	1,506	100.0	100.0	12	100.0	100.0	3,988	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.

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 15380 (Buffalo-Cheektowaga, 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	7	58.3	43.6	2,225	38.1	25.0	2	50.0	49.1	547	21.5	34.1	89.0
Over \$1 Million	4	33.3		3,175	54.3		2	50.0		2,000	78.5		10.0
Revenue Unknown	1	8.3		445	7.6		0	0.0		0	0.0		1.0
<b>Total</b>	<b>12</b>	<b>100.0</b>		<b>5,845</b>	<b>100.0</b>		<b>4</b>	<b>100.0</b>		<b>2,547</b>	<b>100.0</b>		<b>100.0</b>
By Loan Size													
\$100,000 or Less	3	25.0	89.3	225	3.8	31.5	1	25.0	94.5	10	0.4	40.3	
\$100,001 - \$250,000	2	16.7	6.0	260	4.4	19.8	0	0.0	2.8	0	0.0	14.4	
\$250,001 - \$1 Million	7	58.3	4.7	5,360	91.7	48.7	3	75.0	2.8	2,537	99.6	45.2	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>5,845</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>2,547</b>	<b>100.0</b>	<b>100.0</b>	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	3	42.9		225	10.1		1	50.0		10	1.8		
\$100,001 - \$250,000	2	28.6		260	11.7		0	0.0		0	0.0		
\$250,001 - \$1 Million	2	28.6		1,740	78.2		1	50.0		537	98.2		
<b>Total</b>	<b>7</b>	<b>100.0</b>		<b>2,225</b>	<b>100.0</b>		<b>2</b>	<b>100.0</b>		<b>547</b>	<b>100.0</b>		

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 13780 (Binghamton, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	1	7.1	9.0	77	5.2	5.3	8	42.1	12.5	599	29.3	7.9	21.6
Moderate	2	14.3	24.9	139	9.3	19.8	4	21.1	24.7	317	15.5	20.5	16.9
Middle	5	35.7	23.6	360	24.1	22.7	3	15.8	22.1	371	18.2	22.7	21.6
Upper	5	35.7	29.4	719	48.1	40.7	4	21.1	26.2	756	37.0	36.2	39.9
Unknown	1	7.1	13.1	199	13.3	11.6	0	0.0	14.5	0	0.0	12.7	0.0
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>1,494</b>	<b>100.0</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>2,043</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance Loans													
Low	0	0.0	10.8	0	0.0	6.0	1	1.8	7.8	78	0.8	4.0	21.6
Moderate	4	18.2	19.7	320	10.9	14.5	10	18.2	16.8	616	6.6	11.1	16.9
Middle	6	27.3	23.0	534	18.2	20.9	12	21.8	22.1	1,521	16.4	18.8	21.6

Upper	11	50.0	36.2	1,106	37.7	44.9	31	56.4	40.4	5,576	60.2	50.9	39.9
Unknown	1	4.5	10.3	975	33.2	13.7	1	1.8	12.9	1,475	15.9	15.1	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>2,935</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>9,266</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	12.5	0	0.0	10.9	0	0.0	12.2	0	0.0	8.6	21.6
Moderate	1	100.0	18.8	50	100.0	15.9	0	0.0	20.6	0	0.0	18.9	16.9
Middle	0	0.0	27.2	0	0.0	25.4	0	0.0	26.0	0	0.0	23.5	21.6
Upper	0	0.0	39.2	0	0.0	45.7	0	0.0	38.6	0	0.0	45.9	39.9
Unknown	0	0.0	2.3	0	0.0	2.2	0	0.0	2.6	0	0.0	3.1	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	1	2.7	9.9	77	1.7	5.8	9	12.2	10.0	677	6.0	6.1	21.6
Moderate	7	18.9	21.9	509	11.4	17.8	14	18.9	20.0	933	8.3	16.1	16.9
Middle	11	29.7	23.3	894	20.0	22.0	15	20.3	20.9	1,892	16.7	20.2	21.6
Upper	16	43.2	31.3	1,825	40.7	41.0	35	47.3	30.3	6,332	56.0	40.3	39.9
Unknown	2	5.4	13.6	1,174	26.2	13.5	1	1.4	18.8	1,475	13.0	17.3	0.0
<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>100.0</b>	<b>4,479</b>	<b>100.0</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>11,309</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: MSA 13780 (Binghamton, NY)</b>													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	2	8.7	7.8	157	4.7	4.9	7	33.3	9.1	574	23.9	5.8	21.4
Moderate	4	17.4	22.8	375	11.2	18.1	3	14.3	23.9	329	13.7	18.7	17.7
Middle	3	13.0	23.5	475	14.1	22.3	6	28.6	21.8	756	31.5	20.9	20.4
Upper	14	60.9	30.9	2,353	70.0	41.0	5	23.8	31.5	741	30.9	42.1	40.6
Unknown	0	0.0	15.0	0	0.0	13.8	0	0.0	13.8	0	0.0	12.5	0.0
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>3,360</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>2,400</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	5.6	5.7	128	2.8	3.2	1	11.1	11.3	96	10.5	6.9	21.4
Moderate	6	16.7	16.8	460	9.9	12.4	2	22.2	21.3	251	27.5	16.5	17.7
Middle	9	25.0	23.1	882	19.0	20.1	3	33.3	26.2	221	24.2	25.0	20.4
Upper	18	50.0	42.9	3,011	65.0	51.9	3	33.3	33.5	346	37.9	42.9	40.6
Unknown	1	2.8	11.5	153	3.3	12.4	0	0.0	7.7	0	0.0	8.7	0.0
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>4,634</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>914</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	9.8	0	0.0	7.1	0	0.0	7.6	0	0.0	4.9	21.4

Moderate	0	0.0	14.9	0	0.0	11.9	0	0.0	20.1	0	0.0	15.8	17.7
Middle	2	66.7	26.1	42	70.0	27.4	1	100.0	23.4	77	100.0	22.9	20.4
Upper	1	33.3	47.0	18	30.0	50.6	0	0.0	46.1	0	0.0	53.1	40.6
Unknown	0	0.0	2.2	0	0.0	3.0	0	0.0	2.8	0	0.0	3.3	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	4	6.5	7.0	285	3.5	4.3	8	25.8	9.4	670	19.8	6.0	21.4
Moderate	10	16.1	19.6	835	10.4	15.6	5	16.1	22.8	580	17.1	18.1	17.7
Middle	14	22.6	23.1	1,399	17.4	21.4	10	32.3	22.8	1,054	31.1	21.7	20.4
Upper	33	53.2	35.8	5,382	66.8	44.6	8	25.8	33.6	1,087	32.1	42.9	40.6
Unknown	1	1.6	14.6	153	1.9	14.1	0	0.0	11.4	0	0.0	11.4	0.0
<b>Total</b>	<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>8,054</b>	<b>100.0</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>3,391</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

<b>Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: MSA 13780 (Binghamton, NY)</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	14	50.0	41.0	1,151	22.0	27.6	31	34.4	34.7	912	12.5	22.5	90.0
<b>Over \$1 Million</b>	13	46.4		4,073	77.9		27	30.0		4,748	65.2		8.7
<b>Revenue Unknown</b>	1	3.6		5	0.1		32	35.6		1,624	22.3		1.3
<b>Total</b>	28	100.0		5,229	100.0		90	100.0		7,284	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	15	53.6	94.5	699	13.4	41.8	66	73.3	86.0	1,998	27.4	30.4	
<b>\$100,001 - \$250,000</b>	6	21.4	3.4	1,030	19.7	19.5	19	21.1	8.4	2,849	39.1	22.3	
<b>\$250,001 - \$1 Million</b>	7	25.0	2.1	3,500	66.9	38.7	5	5.6	5.7	2,437	33.5	47.2	
<b>Total</b>	28	100.0	100.0	5,229	100.0	100.0	90	100.0	100.0	7,284	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	11	78.6		501	43.5		30	96.8		722	79.2		
<b>\$100,001 - \$250,000</b>	2	14.3		350	30.4		1	3.2		190	20.8		
<b>\$250,001 - \$1 Million</b>	1	7.1		300	26.1		0	0.0		0	0.0		
<b>Total</b>	14	100.0		1,151	100.0		31	100.0		912	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 13780 (Binghamton, 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	38	48.7	43.1	1,715	24.7	22.8	13	61.9	49.5	1,531	33.7	30.2	89.9
Over \$1 Million	18	23.1		4,099	59.1		8	38.1		3,010	66.3		8.8
Revenue Unknown	22	28.2		1,123	16.2		0	0.0		0	0.0		1.4
<b>Total</b>	<b>78</b>	<b>100.0</b>		<b>6,937</b>	<b>100.0</b>		<b>21</b>	<b>100.0</b>		<b>4,541</b>	<b>100.0</b>		<b>100.0</b>
By Loan Size													
\$100,000 or Less	61	78.2	91.0	2,106	30.4	37.4	12	57.1	95.6	565	12.4	47.0	
\$100,001 - \$250,000	12	15.4	5.7	2,081	30.0	23.4	4	19.0	2.5	776	17.1	15.8	
\$250,001 - \$1 Million	5	6.4	3.2	2,750	39.6	39.1	5	23.8	1.9	3,200	70.5	37.2	
<b>Total</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>6,937</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>4,541</b>	<b>100.0</b>	<b>100.0</b>	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	34	89.5		939	54.8		10	76.9		405	26.5		
\$100,001 - \$250,000	3	7.9		476	27.8		2	15.4		326	21.3		
\$250,001 - \$1 Million	1	2.6		300	17.5		1	7.7		800	52.3		
<b>Total</b>	<b>38</b>	<b>100.0</b>		<b>1,715</b>	<b>100.0</b>		<b>13</b>	<b>100.0</b>		<b>1,531</b>	<b>100.0</b>		

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 27060 (Ithaca, NY)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	1	16.7	4.8	130	13.1	2.5	1	7.7	4.4	170	5.6	2.2	21.0
Moderate	2	33.3	22.0	341	34.3	14.6	2	15.4	19.8	337	11.1	13.7	16.7
Middle	0	0.0	24.6	0	0.0	22.2	5	38.5	24.5	1,210	39.8	22.1	21.2
Upper	3	50.0	41.8	522	52.6	53.1	5	38.5	44.6	1,321	43.5	57.2	41.0
Unknown	0	0.0	6.8	0	0.0	7.5	0	0.0	6.6	0	0.0	4.8	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>993</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>3,038</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance Loans													
Low	2	10.5	8.9	165	4.2	5.1	1	3.0	5.6	120	2.1	2.5	21.0
Moderate	3	15.8	18.9	440	11.3	14.2	4	12.1	18.2	848	15.1	12.0	16.7
Middle	5	26.3	25.3	902	23.2	21.5	10	30.3	21.0	1,310	23.4	16.6	21.2

Upper	8	42.1	39.1	2,328	59.8	48.3	16	48.5	47.2	3,157	56.3	56.9	41.0
Unknown	1	5.3	7.8	60	1.5	10.9	2	6.1	8.0	170	3.0	12.0	0.0
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>3,895</b>	<b>100.0</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>5,605</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.7	0	0.0	4.2	0	0.0	1.8	0	0.0	2.5	21.0
Moderate	1	50.0	17.6	110	56.4	12.9	1	33.3	15.8	35	49.3	9.3	16.7
Middle	0	0.0	25.9	0	0.0	19.4	1	33.3	24.6	16	22.5	14.5	21.2
Upper	1	50.0	49.4	85	43.6	55.6	1	33.3	54.4	20	28.2	65.6	41.0
Unknown	0	0.0	2.4	0	0.0	7.9	0	0.0	3.5	0	0.0	8.0	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>195</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	3	11.1	6.4	295	5.8	3.4	2	4.1	4.9	290	3.3	2.3	21.0
Moderate	6	22.2	20.2	891	17.5	14.4	7	14.3	18.2	1,220	14.0	12.7	16.7
Middle	5	18.5	25.5	902	17.7	22.4	16	32.7	22.1	2,536	29.1	19.2	21.2
Upper	12	44.4	40.8	2,935	57.7	51.2	22	44.9	45.3	4,498	51.6	56.8	41.0
Unknown	1	3.7	7.1	60	1.2	8.6	2	4.1	9.5	170	2.0	9.0	0.0
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>5,083</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>8,714</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: MSA 27060 (Ithaca, NY)</b>													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	8.5	0	0.0	4.2	0	0.0	6.7	0	0.0	3.4	19.8
Moderate	3	27.3	20.0	593	21.2	14.0	1	50.0	20.1	246	34.8	13.8	19.6
Middle	2	18.2	20.9	399	14.3	19.4	0	0.0	22.7	0	0.0	20.5	20.8
Upper	6	54.5	43.5	1,806	64.5	55.2	1	50.0	42.0	460	65.2	53.3	39.8
Unknown	0	0.0	7.0	0	0.0	7.2	0	0.0	8.6	0	0.0	9.1	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>2,798</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>706</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	3.8	6.6	77	1.3	3.6	1	16.7	12.3	90	11.4	5.9	19.8
Moderate	5	19.2	18.1	793	13.2	13.0	1	16.7	26.7	230	29.1	16.7	19.6
Middle	7	26.9	27.1	1,033	17.3	23.3	3	50.0	21.4	350	44.3	17.1	20.8
Upper	11	42.3	42.5	2,403	40.1	51.9	1	16.7	34.5	120	15.2	54.9	39.8
Unknown	2	7.7	5.6	1,680	28.1	8.1	0	0.0	5.1	0	0.0	5.4	0.0
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>5,986</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>790</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.0	0	0.0	3.7	0	0.0	5.3	0	0.0	2.2	19.8

Moderate	0	0.0	18.0	0	0.0	14.2	0	0.0	24.4	0	0.0	17.8	19.6
Middle	1	50.0	25.0	25	62.5	15.7	1	100.0	27.5	65	100.0	25.1	20.8
Upper	1	50.0	50.0	15	37.5	57.7	0	0.0	40.5	0	0.0	51.1	39.8
Unknown	0	0.0	2.0	0	0.0	8.7	0	0.0	2.3	0	0.0	3.8	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	1	2.6	7.4	77	0.9	3.9	1	11.1	8.1	90	5.8	4.0	19.8
Moderate	8	20.5	19.0	1,386	15.7	13.5	2	22.2	22.8	476	30.5	14.9	19.6
Middle	10	25.6	24.0	1,457	16.5	21.0	4	44.4	22.8	415	26.6	19.5	20.8
Upper	18	46.2	43.2	4,224	47.9	53.9	2	22.2	39.5	580	37.2	53.8	39.8
Unknown	2	5.1	6.4	1,680	19.0	7.6	0	0.0	6.9	0	0.0	7.8	0.0
<b>Total</b>	<b>39</b>	<b>100.0</b>	<b>100.0</b>	<b>8,824</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,561</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
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.													

<b>Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: MSA 27060 (Ithaca, NY)</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	14	93.3	45.6	482	90.6	38.3	40	43.0	33.7	1,329	23.8	27.0	91.0
<b>Over \$1 Million</b>	1	6.7		50	9.4		10	10.8		2,747	49.1		7.8
<b>Revenue Unknown</b>	0	0.0		0	0.0		43	46.2		1,516	27.1		1.2
<b>Total</b>	15	100.0		532	100.0		93	100.0		5,592	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	14	93.3	91.6	430	80.8	30.8	82	88.2	86.6	2,470	44.2	32.1	
<b>\$100,001 - \$250,000</b>	1	6.7	3.9	102	19.2	15.3	6	6.5	7.8	1,033	18.5	21.9	
<b>\$250,001 - \$1 Million</b>	0	0.0	4.6	0	0.0	53.9	5	5.4	5.6	2,089	37.4	46.0	
<b>Total</b>	15	100.0	100.0	532	100.0	100.0	93	100.0	100.0	5,592	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	13	92.9		380	78.8		38	95.0		974	73.3		
<b>\$100,001 - \$250,000</b>	1	7.1		102	21.2		2	5.0		355	26.7		
<b>\$250,001 - \$1 Million</b>	0	0.0		0	0.0		0	0.0		0	0.0		
<b>Total</b>	14	100.0		482	100.0		40	100.0		1,329	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 27060 (Ithaca, NY)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
\$1 Million or Less	38	48.1	53.8	2,768	37.5	55.0	6	75.0	48.3	258	63.2	40.3	91.4
Over \$1 Million	7	8.9		1,899	25.8		2	25.0		150	36.8		7.4
Revenue Unknown	34	43.0		2,705	36.7		0	0.0		0	0.0		1.2
<b>Total</b>	<b>79</b>	<b>100.0</b>		<b>7,372</b>	<b>100.0</b>		<b>8</b>	<b>100.0</b>		<b>408</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	65	82.3	89.3	1,839	24.9	30.8	7	87.5	95.0	258	63.2	41.0	
\$100,001 - \$250,000	3	3.8	6.3	572	7.8	22.6	1	12.5	2.7	150	36.8	15.4	
\$250,001 - \$1 Million	11	13.9	4.4	4,961	67.3	46.5	0	0.0	2.4	0	0.0	43.6	
<b>Total</b>	<b>79</b>	<b>100.0</b>	<b>100.0</b>	<b>7,372</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>408</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	35	92.1		774	28.0		5	83.3		108	41.9		
\$100,001 - \$250,000	0	0.0		0	0.0		1	16.7		150	58.1		
\$250,001 - \$1 Million	3	7.9		1,994	72.0		0	0.0		0	0.0		
<b>Total</b>	<b>38</b>	<b>100.0</b>		<b>2,768</b>	<b>100.0</b>		<b>6</b>	<b>100.0</b>		<b>258</b>	<b>100.0</b>		

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.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Non-MSA Pennsylvania													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	5.5	0	0.0	2.8	0	0.0	5.9	0	0.0	3.5	17.9
Moderate	2	28.6	18.7	213	22.5	14.2	2	18.2	20.1	254	15.9	15.1	18.4
Middle	2	28.6	27.4	282	29.8	26.4	2	18.2	23.9	379	23.8	22.3	21.0
Upper	3	42.9	35.0	452	47.7	42.7	5	45.5	34.8	734	46.1	43.8	42.7
Unknown	0	0.0	13.4	0	0.0	13.9	2	18.2	15.3	226	14.2	15.3	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>947</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,593</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	4	17.4	9.1	229	6.2	4.7	1	3.1	4.1	36	0.8	2.1	17.9
Moderate	3	13.0	17.8	184	5.0	13.0	2	6.3	12.6	273	5.8	9.0	18.4
Middle	4	17.4	22.4	288	7.8	20.4	7	21.9	22.7	988	21.1	19.2	21.0



Upper	10	43.5	38.5	2,802	75.6	44.4	18	56.3	44.0	2,877	61.3	51.4	42.7
Unknown	2	8.7	12.2	201	5.4	17.5	4	12.5	16.6	517	11.0	18.4	0.0
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>3,704</b>	<b>100.0</b>	<b>100.0</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>4,691</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	9.0	0	0.0	8.4	0	0.0	4.1	0	0.0	3.3	17.9
Moderate	0	0.0	20.8	0	0.0	15.0	0	0.0	17.0	0	0.0	15.7	18.4
Middle	0	0.0	18.1	0	0.0	11.5	0	0.0	22.4	0	0.0	18.0	21.0
Upper	1	100.0	49.3	122	100.0	63.4	0	0.0	54.4	0	0.0	60.9	42.7
Unknown	0	0.0	2.8	0	0.0	1.7	0	0.0	2.0	0	0.0	2.1	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>122</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	4	12.9	7.1	229	4.8	3.6	1	2.3	5.0	36	0.6	2.8	17.9
Moderate	5	16.1	18.1	397	8.3	13.7	4	9.3	16.0	527	8.4	11.8	18.4
Middle	6	19.4	24.3	570	11.9	23.6	9	20.9	23.1	1,367	21.8	20.4	21.0
Upper	14	45.2	37.9	3,376	70.7	43.9	23	53.5	39.8	3,611	57.5	47.6	42.7
Unknown	2	6.5	12.7	201	4.2	15.2	6	14.0	16.0	743	11.8	17.4	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>4,773</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>6,284</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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.

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Non-MSA Pennsylvania</b>													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	30.0	6.5	201	22.1	3.6	1	11.1	5.5	86	6.5	3.1	19.1
Moderate	2	20.0	19.1	154	16.9	13.5	4	44.4	24.0	516	38.8	18.0	19.3
Middle	3	30.0	22.7	339	37.3	21.5	2	22.2	24.5	281	21.1	23.8	23.0
Upper	2	20.0	34.0	215	23.7	44.2	2	22.2	34.2	446	33.6	43.5	38.7
Unknown	0	0.0	17.7	0	0.0	17.2	0	0.0	11.8	0	0.0	11.7	0.0
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>909</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,329</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	15.0	4.5	165	6.0	2.3	4	44.4	10.5	271	36.7	6.4	19.1
Moderate	2	10.0	15.3	180	6.5	10.1	2	22.2	19.0	157	21.3	14.2	19.3
Middle	4	20.0	20.3	472	17.1	17.0	2	22.2	27.6	240	32.5	28.3	23.0
Upper	11	55.0	41.7	1,940	70.4	50.6	1	11.1	37.2	70	9.5	43.8	38.7
Unknown	0	0.0	18.2	0	0.0	19.9	0	0.0	5.6	0	0.0	7.3	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>2,757</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>738</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	7.1	0	0.0	5.7	0	0.0	7.1	0	0.0	5.9	19.1

Moderate	0	0.0	14.3	0	0.0	11.1	0	0.0	19.2	0	0.0	15.2	19.3
Middle	1	100.0	22.2	20	100.0	14.8	0	0.0	30.2	0	0.0	30.5	23.0
Upper	0	0.0	53.2	0	0.0	65.4	0	0.0	40.1	0	0.0	46.2	38.7
Unknown	0	0.0	3.2	0	0.0	3.0	0	0.0	3.3	0	0.0	2.3	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	6	19.4	5.5	366	9.9	3.0	5	27.8	6.8	357	17.3	4.0	19.1
Moderate	4	12.9	16.7	334	9.1	11.8	6	33.3	21.3	673	32.6	16.8	19.3
Middle	8	25.8	21.5	831	22.5	19.2	4	22.2	26.2	521	25.2	25.2	23.0
Upper	13	41.9	39.1	2,155	58.5	47.6	3	16.7	37.1	516	25.0	44.2	38.7
Unknown	0	0.0	17.1	0	0.0	18.4	0	0.0	8.6	0	0.0	9.8	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>3,686</b>	<b>100.0</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>2,067</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2022 FFIEC Census Data</i>													
<i>2016-2020 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													
<i>Multifamily loans are not included in the borrower distribution analysis.</i>													

<b>Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: Non-MSA Pennsylvania</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	19	57.6	43.5	1,388	29.5	32.1	32	47.1	35.0	3,556	36.5	19.0	89.2
<b>Over \$1 Million</b>	14	42.4		3,321	70.5		23	33.8		5,905	60.7		7.3
<b>Revenue Unknown</b>	0	0.0		0	0.0		13	19.1		270	2.8		3.6
<b>Total</b>	33	100.0		4,709	100.0		68	100.0		9,731	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	21	63.6	90.9	818	17.4	35.6	48	70.6	84.3	1,404	14.4	27.4	
<b>\$100,001 - \$250,000</b>	7	21.2	5.8	1,195	25.4	24.1	8	11.8	8.7	1,296	13.3	20.3	
<b>\$250,001 - \$1 Million</b>	5	15.2	3.3	2,696	57.3	40.3	12	17.6	7.0	7,031	72.3	52.3	
<b>Total</b>	33	100.0	100.0	4,709	100.0	100.0	68	100.0	100.0	9,731	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	15	78.9		442	31.8		27	84.4		589	16.6		
<b>\$100,001 - \$250,000</b>	3	15.8		550	39.6		1	3.1		200	5.6		
<b>\$250,001 - \$1 Million</b>	1	5.3		396	28.5		4	12.5		2,767	77.8		
<b>Total</b>	19	100.0		1,388	100.0		32	100.0		3,556	100.0		
<i>Source: 2020 FFIEC Census Data</i>													
<i>2020 Dun &amp; Bradstreet Data</i>													
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

<b>Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: Non-MSA Pennsylvania</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2021</b>						<b>2022</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	17	44.7	52.6	2,108	26.8	31.9	16	64.0	57.9	2,325	48.8	42.0	88.9
<b>Over \$1 Million</b>	17	44.7		5,651	71.7		9	36.0		2,435	51.2		7.0
<b>Revenue Unknown</b>	4	10.5		117	1.5		0	0.0		0	0.0		4.1
<b>Total</b>	38	100.0		7,876	100.0		25	100.0		4,760	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	21	55.3	88.7	820	10.4	33.5	14	56.0	91.9	550	11.6	37.3	
<b>\$100,001 - \$250,000</b>	9	23.7	7.3	1,797	22.8	23.6	5	20.0	4.7	910	19.1	19.6	
<b>\$250,001 - \$1 Million</b>	8	21.1	4.0	5,259	66.8	42.9	6	24.0	3.4	3,300	69.3	43.0	
<b>Total</b>	38	100.0	100.0	7,876	100.0	100.0	25	100.0	100.0	4,760	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	13	76.5		358	17.0		13	81.3		525	22.6		
<b>\$100,001 - \$250,000</b>	2	11.8		450	21.3		0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	2	11.8		1,300	61.7		3	18.8		1,800	77.4		
<b>Total</b>	17	100.0		2,108	100.0		16	100.0		2,325	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.													

**APPENDIX B – SCOPE OF EXAMINATION**

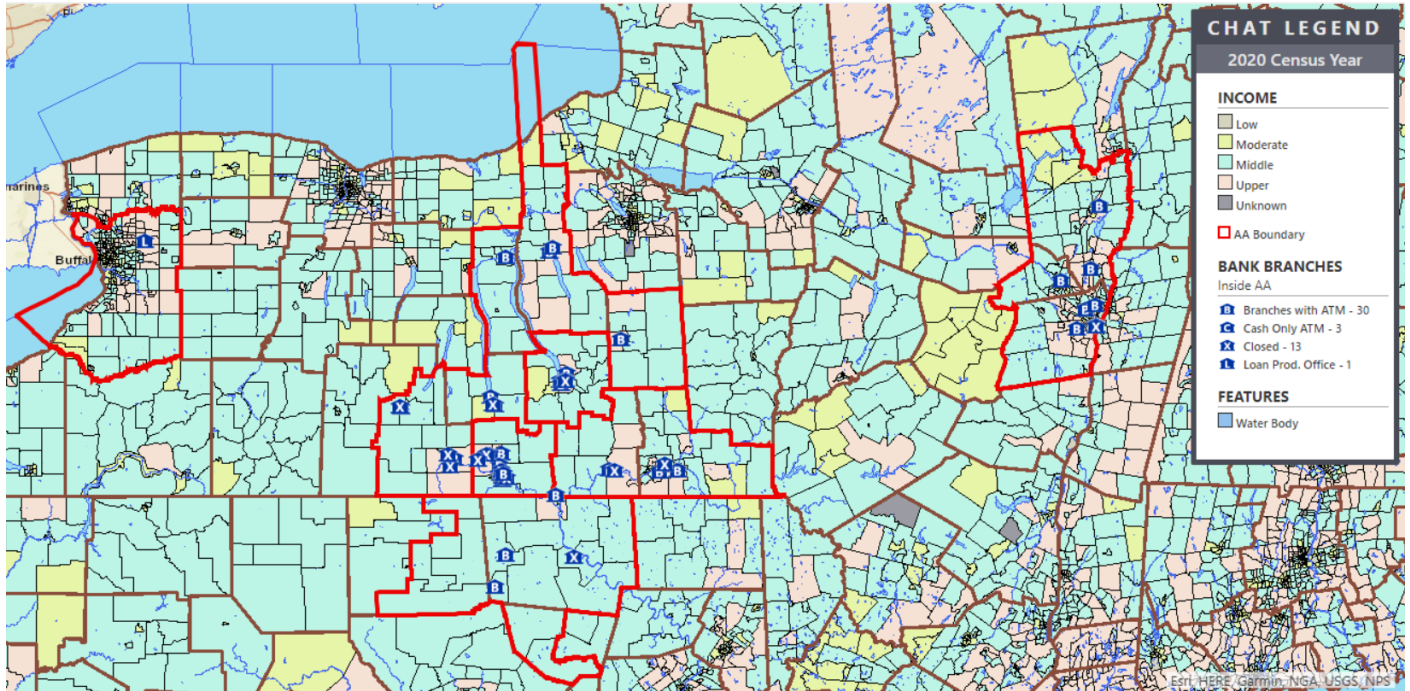
SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED:</b>		Lending: January 1, 2019 – December 31, 2022 Community Development Activity: April 1, 2019 – June 30, 2023	
<b>FINANCIAL INSTITUTION</b>  Chemung Canal Trust Company One Chemung Canal Plaza Elmira, NY 14901			<b>PRODUCTS REVIEWED</b>  Home Purchase Refinancing Small Business
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		
None			
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<b>New York State:</b>			
MSA 21300 (Elmira, NY)	Full Scope Review	None	None
Non-Metropolitan New York	Full Scope Review	None	None
MSA 10580 (Albany-Schenectady-Troy, NY)	Full Scope Review	None	None
MSA 15380 (Buffalo-Cheektowaga, NY)	Limited Scope Review	None	None
MSA 27060 (Ithaca, NY)	Limited Scope Review	None	None
MSA 13780 (Binghamton, NY)	Limited Scope Review	None	None
<b>Commonwealth of Pennsylvania:</b>			
Non-Metropolitan Pennsylvania	Full Scope Review	None	None

**APPENDIX C – SUMMARY OF STATE AND MULTISTATE METROPOLITAN  
AREA RATINGS**

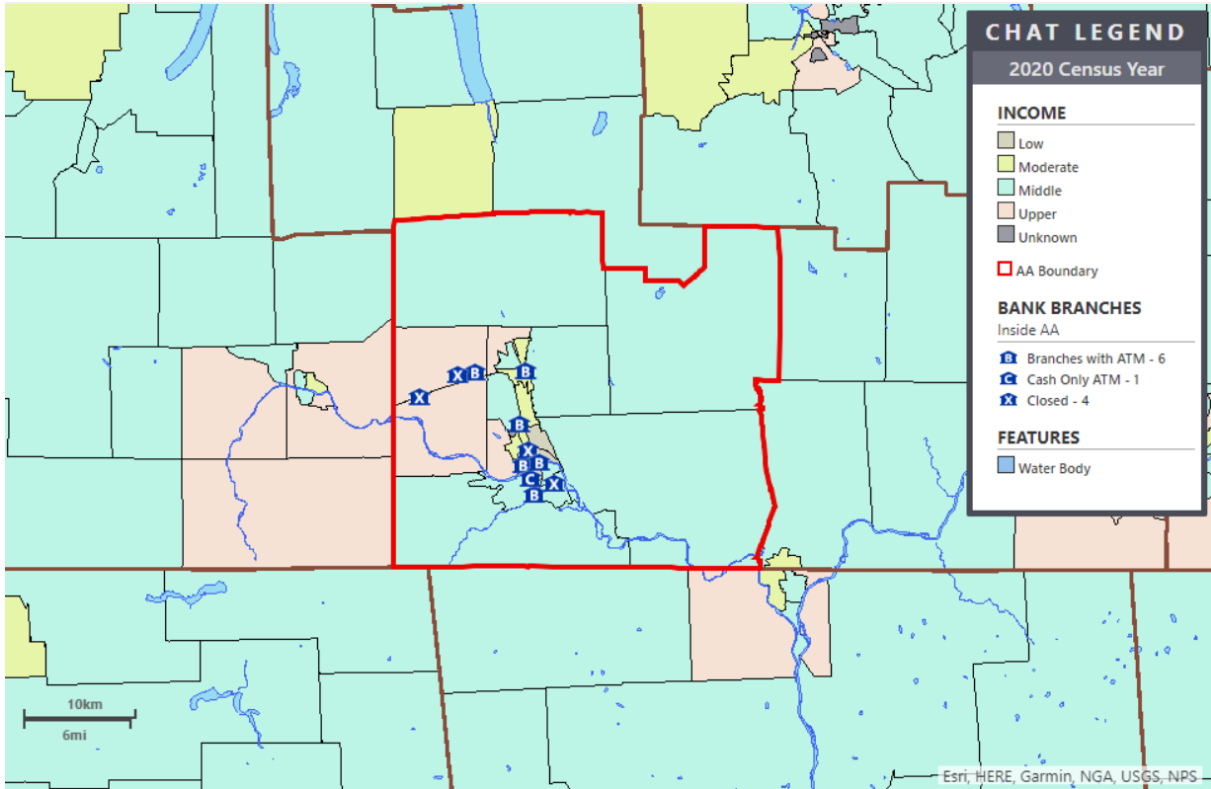
<b>STATE/MULTISTATE MSA</b>	<b>LENDING TEST RATING</b>	<b>INVESTMENT TEST RATING</b>	<b>SERVICE TEST RATING</b>	<b>OVERALL RATING</b>
<b>New York State</b>	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
<b>Pennsylvania</b>	<b>Low Satisfactory</b>	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>

## APPENDIX D – ASSESSMENT AREA MAPS

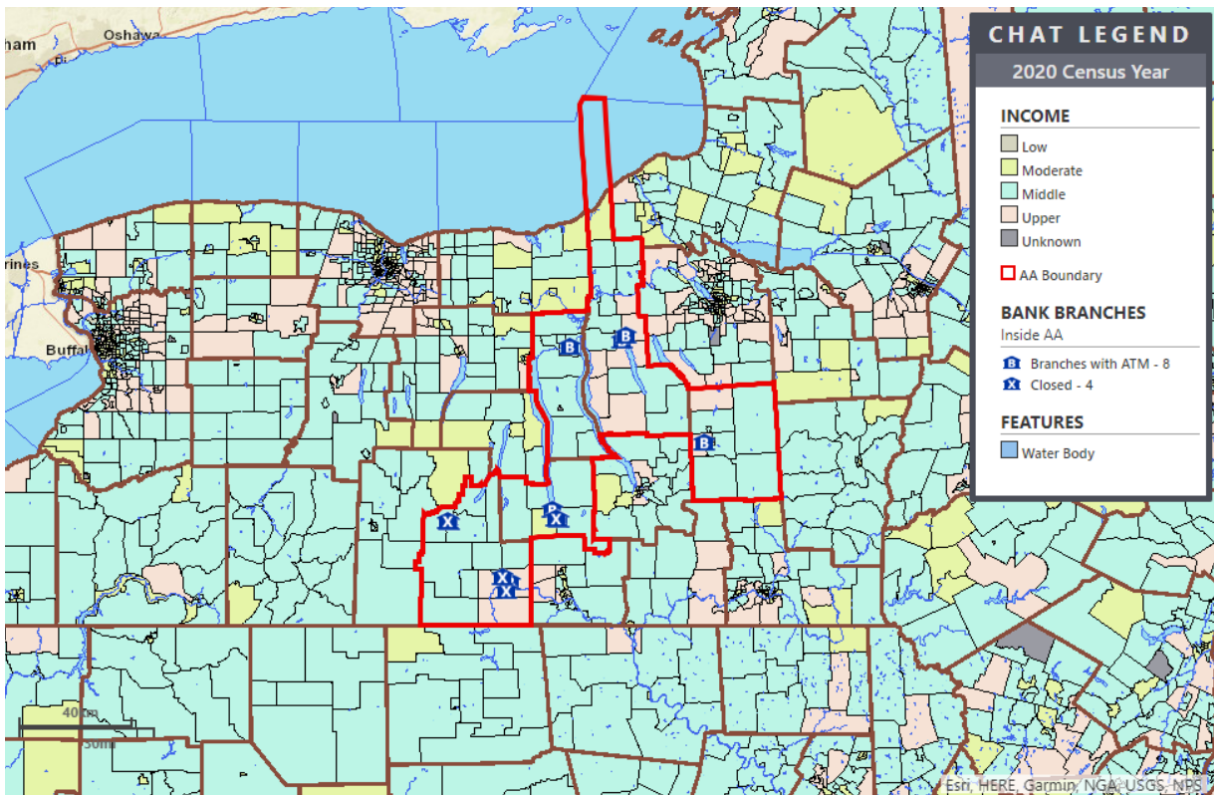
### CHEMUNG All Assessment Areas



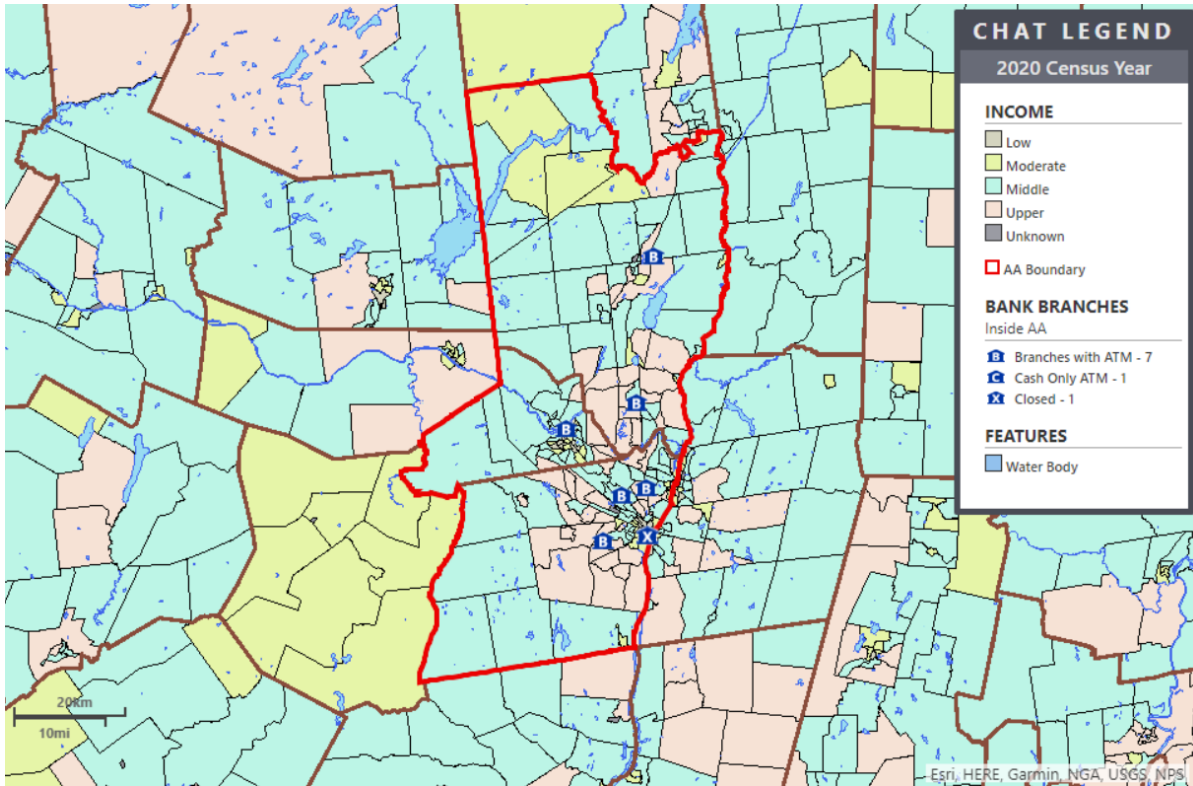
### MSA 21300 (Elmira, NY) Assessment Area



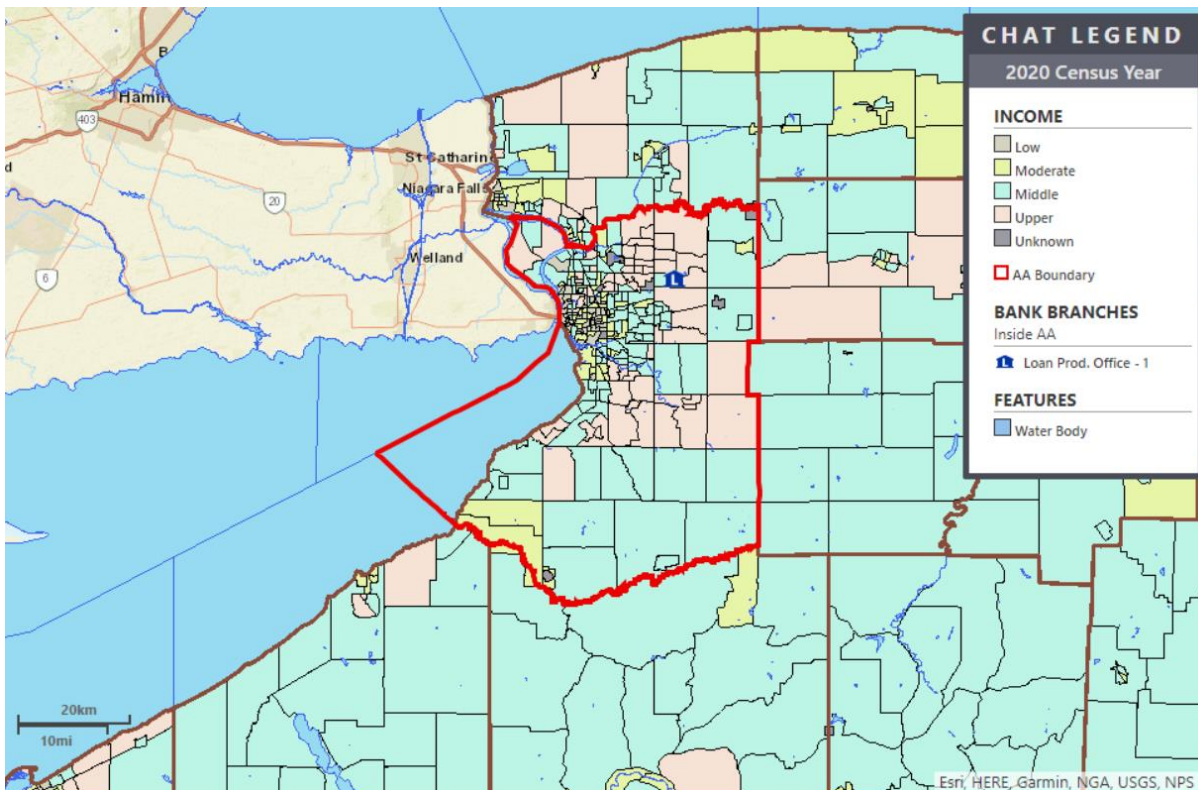
### Non-Metropolitan New York Assessment Area



### MSA 10580 (Albany-Schenectady-Troy, NY) Assessment Area

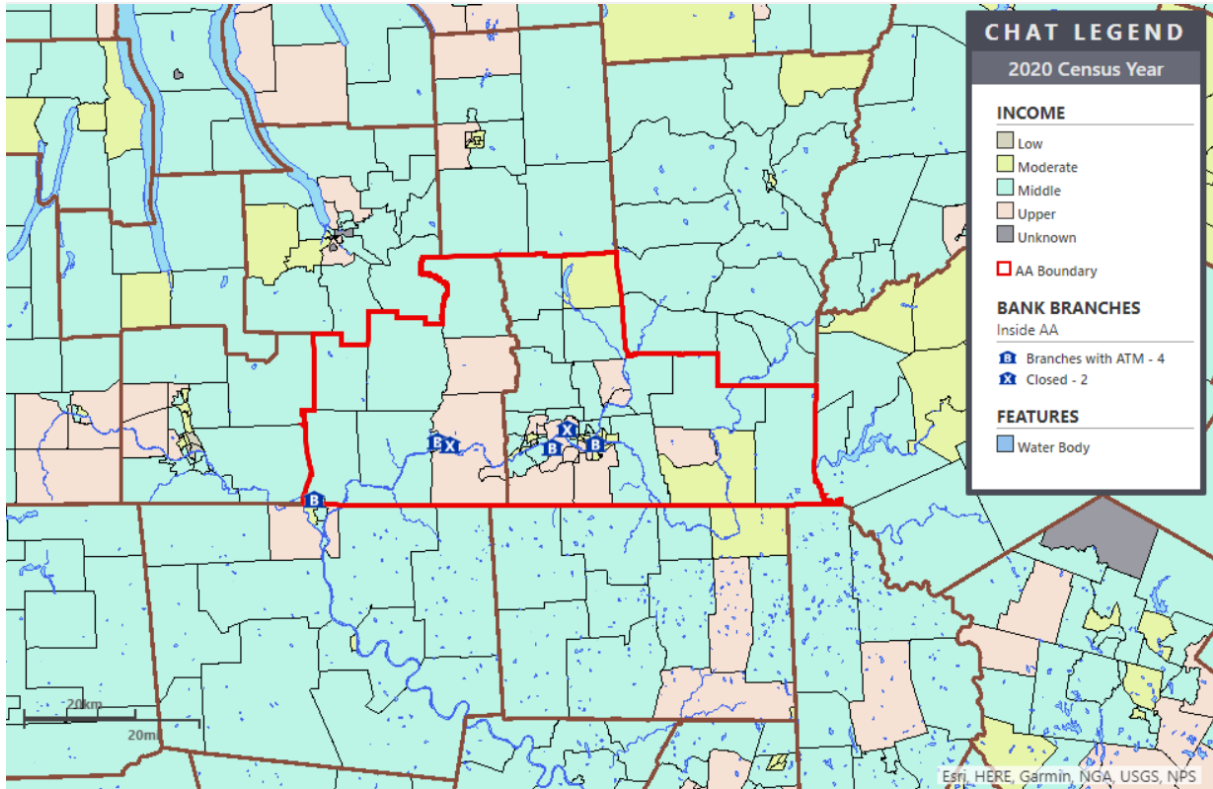


### MSA 15380 (Buffalo-Cheektowaga, NY) Assessment Area

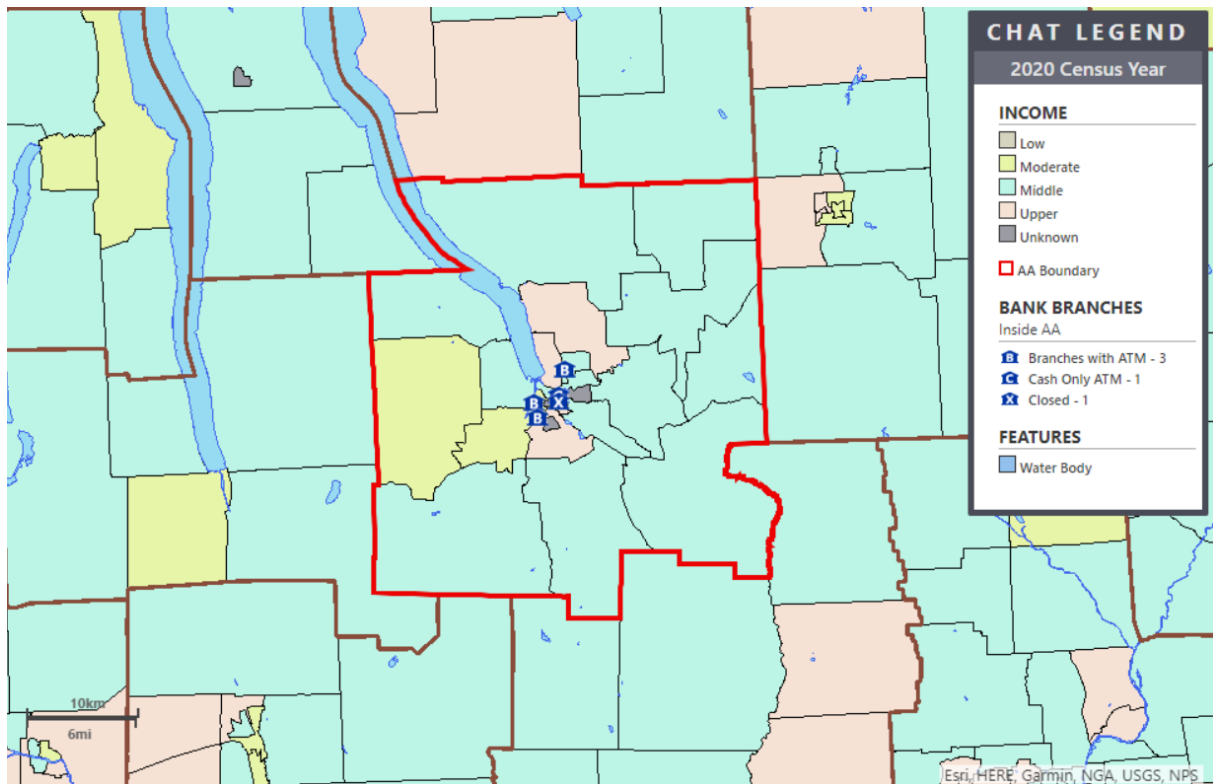




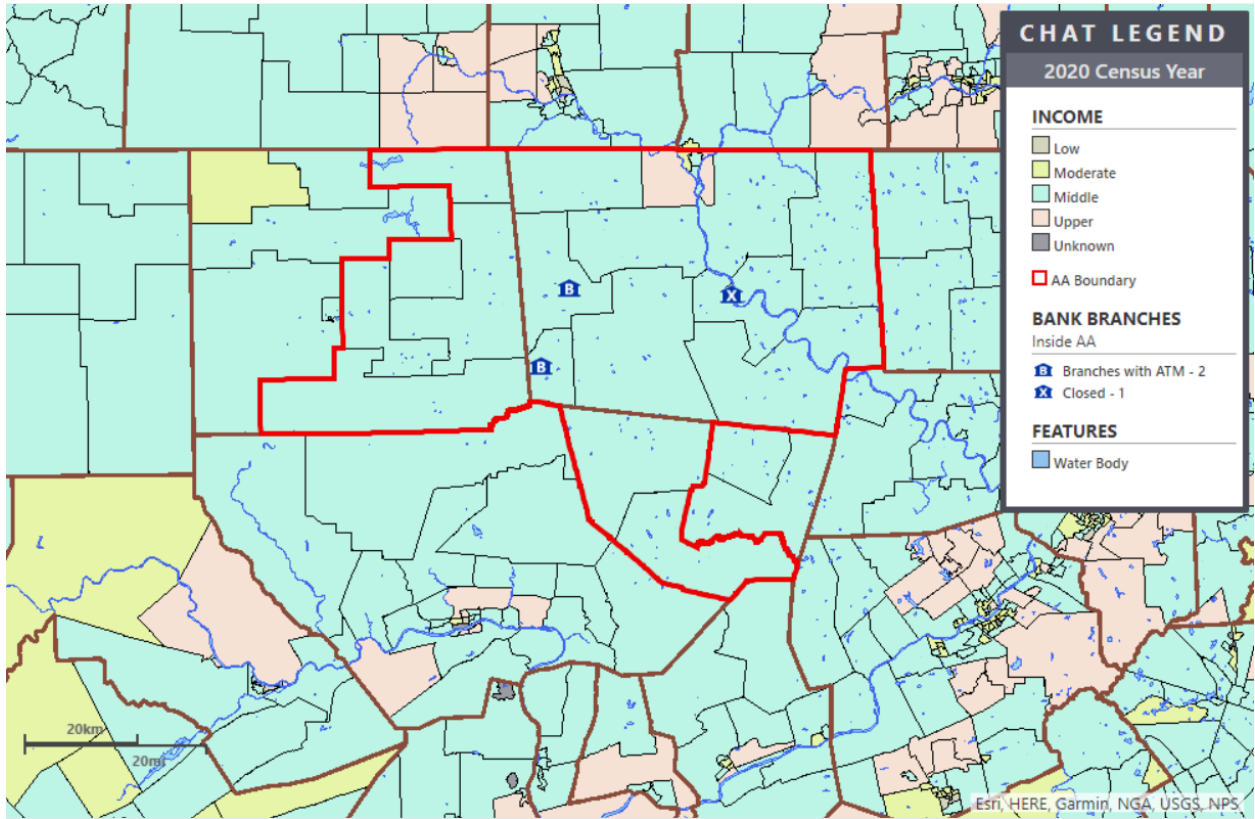
### MSA 13780 (Binghamton, NY) Assessment Area



### MSA 27060 (Ithaca, NY) Assessment Area



### Non-Metropolitan Pennsylvania Assessment Area



## APPENDIX E – 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 GARs of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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

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

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

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

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

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

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

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

**Market share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of a geography.

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

**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% of the area median income, or a median family income that is more than 120%, in the case of a geography.