



PUBLIC DISCLOSURE

August 14, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Trustco Bank
Charter Number 707635

1 Sarnowski Drive
Glenville, NY 12302

Office of the Comptroller of the Currency

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Suite A-30
Edison, NJ 08837

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, and should not 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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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of Trustco Bank (Trustco or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Trustco Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
Needs to Improve			
Substantial Noncompliance			

** The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.*

The major factors that support this rating include:

- The Lending Test rating is primarily based on the performance in the State of New York. This area has the most branches, the highest level of deposits, and the most significant volume of lending. A substantial volume of the bank’s loans are located within its assessment areas. The bank has an adequate distribution of loans in low- and moderate-income geographies and to low- to moderate-income (LMI) individuals.
- The Investment Test rating is primarily based on the performance in the State of New York. This area has the most branches, the highest level of deposits, and the most significant volume of lending. The bank made an adequate level of qualified community development (CD) investments and grants across the rating areas.
- The Service Test rating is primarily based on the performance in the State of New York. This area has the most branches, the highest level of deposits, and the most significant volume of lending. The bank provided a relatively high level of CD services across the rating areas, especially considering the limitations imposed by the COVID-19 pandemic. Service delivery systems are accessible to geographies and individuals of different income levels in the bank’s footprint.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment areas (AA).

The bank originated and purchased 96.7 percent of its total number of loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Value of Loans (\$000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgages	15,149	96.6	537	3.4	15,686	3,132,028	96.1	126,458	3.9	3,258,484
Small Business	1,268	98.1	25	1.9	1,293	157,734	96.7	5,315	3.3	163,049
Total	16,417	96.7	562	3.3	16,979	3,289,762	96.1	131,773	3.9	3,421,533

Source: Bank Data. Due to rounding, totals may not equal 100.0%.

Home mortgage and small business loans are considered primary loan products of the bank. These products have a greater direct impact and are the most responsive to credit needs in the bank's rating areas. Small business loans are considered only in those AAs where the bank generated 20 or more small business loans; however, less weight is given to small business loans, as they constitute a small percentage of overall lending.

Product Innovation and Flexibility

The bank offered several flexible affordable mortgage products during the evaluation period. These innovative and/or flexible lending practices were considered in the evaluation of performance under the lending test in each rating area.

Home Town First Time Home Buyer Program

This is a flexible program available for consumers purchasing their first home and meet income requirements based on HUD guidelines. This is a flexible home purchase program targeted to LMI individuals. This program allows up to 95 percent financing, reduced application and closing costs, no appraisal fees, no points, and a potential rate discount for borrowers who schedule automatic payments from a bank checking account. The bank originated 142 loans during the evaluation period totaling approximately \$21.1 million under the program.

Home Town Hero Mortgage Loan Program

This program consists of a conventional residential mortgage, with discounted fees and applies to any active or veteran members of the military, active police officers, or active firefighters applying for a purchase, new construction, or building loan. The bank originated 12 loans during the evaluation period totaling approximately \$4.6 million under the program.

95 Percent or 97 Percent Loan-to-Value Mortgage Program

The program features down payments as low as three or five percent and no borrower paid private mortgage insurance. This program features no appraisal fee, waives the tax escrow requirement, and offers a potential rate discount for borrowers who schedule automatic payments from a bank checking

account. The bank originated 363 loans under the 95 percent LTV mortgage program during the evaluation period totaling approximately \$99.8 million. The bank originated 138 loans under the 97 percent LTV mortgage program during the evaluation period totaling approximately \$33.9 million.

Small Business Administration (SBA) Loan Programs

The bank participates in the SBA 7(a) and SBA Express Loan programs. These programs allow flexible underwriting for borrowers that generally would not qualify under traditional underwriting criteria. The bank originated three loans totaling approximately \$602,500 under the SBA program during the evaluation period.

SBA Paycheck Protection Program

The bank made use of responsive flexible lending during the pandemic in 2020 and 2021 by originating loans to stabilize small businesses and communities through the SBA's Paycheck Protection Program (PPP), which is an SBA-backed loan that helped businesses keep their workforce employed during the pandemic. During the evaluation period the bank generated 1,006 PPP loans totaling \$68.4 million. This activity received positive consideration, as it provided stabilization of small businesses and communities.

Description of Institution

Trustco Bank is a multistate bank and is headquartered in Glenville, New York. Trustco Bank is fully owned by Trustco Bank Corp NY, a publicly traded company. The bank operates in central Florida, the eastern part of the state of New York, and has a limited presence in Massachusetts, New Jersey, and Vermont. Trustco maintained five rating areas and 10 AAs across five states. The bank maintains a network of 143 branch locations and 159 deposit-taking ATMs.

Trustco is a full-service financial bank offering a wide variety of loan and deposit products to both retail and commercial customers. Trustco retains a large number of retail customers with a focus on one-to-four family lending. Loan products include traditional mortgages such as conventional residential mortgages, junior-lien mortgages, and revolving home equity credit lines. Commercial and industrial loan products consist of short-term and revolving credit loans. Credit card offerings are available for retail customers and small businesses.

As of December 31, 2022, Trustco had total assets of \$6.1 billion, total loans of \$4.7 billion, and tier one capital of \$610 million. One-to-four family mortgages represent approximately 88 percent of total loans and leases, the bank's largest concentration of loans.

Trustco's alternative delivery banking services include a mobile online banking application and online banking system to allow easier access to their products and services. The bank is a member of the Allpoint ATM Network and the Publix Supermarket ATM network, which offers customers surcharge-free ATM access at participating locations.

On March 20, 2020, the World Health Organization declared COVID-19 a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place order, a significant number of businesses deemed non-essential were shut down or limited in operations. During COVID-19, Trustco branches remained open, including those

in LMI geographies. The evaluation of the bank’s performance takes into consideration the impact of the pandemic.

Trustco participated in and initiated numerous programs to address economic hardships associated with the pandemic. Trustco established a COVID-19 Relief Fund, which provided \$30,000 in donations to support 16 different organizations with their relief efforts. Trustco also created a loan deferral program for business and retail customers. The program resulted in 94 business loans totaling \$49.8 million and 917 residential loans totaling \$183.3 million that were in some form of deferment. The bank also participated in the PPP program. Between 2020-2021, Trustco originated 1,006 PPP loans with proceeds of \$68.4 million.

There was no merger or acquisition activity during the evaluation period. There were no legal or financial factors impeding the bank’s ability to help meet credit needs in its AAs during the evaluation period. Trustco’s CRA performance was rated “Satisfactory” as of the last public evaluation dated June 8, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending, Investment, and Service Tests was January 1, 2020, through December 31, 2022. The OCC analyzed home mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses the bank reported under the CRA. The OCC compared home mortgage loans originated or purchased during the evaluation period of January 1, 2020 through December 31, 2021 to the 2015 American Community Service (ACS) survey data. The OCC compared home mortgage loans originated or purchased during the evaluation period of January 1, 2022 through December 31, 2022 to the 2020 US Census data. The OCC compared small loans made to businesses originated or purchased during the evaluation period to 2021 and 2022 Dunn & Bradstreet (D&B) data.

To perform a meaningful analysis for lending performance, each loan product needed a minimum of 20 loans per AA during the evaluation period. Refer to the “Scope of Evaluation” section under each MMSA and State Rating area section for details on loan products that did not have a sufficient volume to perform a quantitative analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the MMSA rating and state ratings. Weighting was determined considering the bank's deposit volume, branch presence, and loan volume in the New York CSA MMSA and each state relative to the entire bank. The rating for the state of New York received the greatest emphasis in our analysis. The state of New York represented 72.3 percent of deposits, 71.9 percent of loans originated and purchased, and 45.5 percent of Trustco's branch network. The state of Florida carried the next greatest emphasis in our conclusions as this state represented 19.1 percent of deposits, 11.1 percent of loans originated and purchased, and 37.1 percent of the branch network.

For the loan products considered under the Lending Test, home mortgage loans received greater weight than small loans to businesses in developing conclusions due to a higher volume of home mortgage loans, reflective of the bank's primary loan product and lending strategy over the evaluation period.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Rating

New York CSA

CRA rating for the New York CSA¹: 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 that support this rating include:

- Lending levels reflect excellent responsiveness to community credit needs.
- A poor geographic distribution of home mortgage loans in the AA.
- An adequate distribution of loans among individuals of different income levels considering the product lines offered by the bank and performance context.
- CD loans represent adequate responsiveness to AA needs. The bank made few, if any CD loans.
- A good level of qualified investments and grants. Qualified investments exhibited good responsiveness to AA needs.
- Service delivery systems are reasonably accessible to portions of the AA. There are no branches located in low-income geographies.
- An adequate level of community development services.

Description of Institution's Operations in New York CSA

The bank's operations in the New York CSA included seven full counties in two states. The bank included Bergen, Putnam, Rockland, and Westchester Counties in the New York-Newark-Jersey City, NY-NJ MSA; Ulster County which comprises all the Kingston, NY MSA; and Dutchess and Orange Counties which comprise all of the Poughkeepsie-Newburgh-Middletown, NY MSA. These counties are part of the New York-Newark, NY-NJ-CT-PA CSA (New York CSA).

The bank operated 23 branches in the AA or 16.1 percent of its total branches as of December 31, 2022. Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share data as of June 30, 2022, the bank had \$424.0 million in deposits in the AA representing 7.9 percent of its total deposits. There is a high level of competition for financial services in the New York CSA. The FDIC report data shows there are 77 financial banks operating 939 offices in the AA. Of those banks, Trustco ranked 41st with 1.2 percent deposit market share. The top three banks accounted for 66.7 percent of deposit market share in the AA.

¹ *[This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.]*

According to 2022 Moody's Analytics data, education and health services represent 25.4 percent of total employment; followed by government at 17.5 percent; and retail trade at 11.8 percent. Medical centers remain the AA's top employers.

According to the Bureau of Labor Statistics (BLS), the non-seasonally adjusted unemployment rate for New York CSA has declined significantly since the pandemic. The unemployment rate declined from 16.0 percent in April of 2020, to 2.7 percent in December of 2022. The unemployment rate is stabilizing as it remained below 3.0 percent during September, October, November, and December of 2022.

The OCC completed six community contacts during the evaluation period to gain an understanding of economic conditions, credit needs, and involvement of local financial banks in the AA. Contacts included various non-profits centered in affordable housing, economic development, and aid to small businesses, as well as various business development centers. A majority of contacts indicated a need for affordable housing, small business financing, and education related to financial literacy. One contact noted a strong need for multi-family affordable housing due to population increases and investors purchasing many of the single-family properties in the area. Another contact indicated a need for small business funding and access to working capital less than \$250,000. The same contact indicated a need for a simpler and more timely process for small businesses to apply for working capital loans, as well as a first-time homebuyer program.

New York CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY CSA 20-21						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	691	3.8	10.7	28.5	56.0	1.0
Population by Geography	3,167,433	3.5	9.9	27.9	58.4	0.3
Housing Units by Geography	1,208,573	2.9	10.2	29.8	57.1	0.0
Owner-Occupied Units by Geography	731,571	0.9	5.3	25.4	68.5	0.0
Occupied Rental Units by Geography	380,256	6.1	18.1	37.3	38.5	0.0
Vacant Units by Geography	96,746	5.2	15.6	34.2	45.0	0.0
Businesses by Geography	410,782	3.2	8.7	24.9	63.2	0.0
Farms by Geography	8,610	0.8	7.7	29.2	62.3	0.0
Family Distribution by Income Level	784,277	16.7	12.9	16.1	54.4	0.0
Household Distribution by Income Level	1,111,827	20.4	12.5	14.9	52.2	0.0
Median Family Income MSA - 28740 Kingston, NY MSA		\$74,546	Median Housing Value			\$406,684
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$67,560	Median Gross Rent			\$1,331
Median Family Income MSA - 39100 Poughkeepsie-Newburgh-Middletown, NY MSA		\$85,780	Families Below Poverty Level			7.0%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York CSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	772	4.7	11.1	31.3	51.3	1.6
Population by Geography	3,275,258	4.5	10.7	29.8	54.2	0.8
Housing Units by Geography	1,231,482	3.6	10.8	31.9	53.2	0.6
Owner-Occupied Units by Geography	747,683	1.1	6.1	28.4	64.0	0.4
Occupied Rental Units by Geography	394,554	8.2	19.0	36.8	35.1	0.9
Vacant Units by Geography	89,245	4.3	13.7	39.2	42.3	0.5
Businesses by Geography	437,330	4.4	9.1	26.2	59.8	0.5
Farms by Geography	8,918	1.5	8.3	33.7	56.1	0.4
Family Distribution by Income Level	797,292	16.6	12.8	16.4	54.2	0.0
Household Distribution by Income Level	1,142,237	20.8	12.4	14.7	52.1	0.0
Median Family Income MSA - 28740 Kingston, NY MSA		\$87,034	Median Housing Value			\$436,929
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$85,483	Median Gross Rent			\$1,527
Median Family Income MSA - 39100 Poughkeepsie-Newburgh-Middletown, NY MSA		\$100,123	Families Below Poverty Level			6.0%
<i>Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in New York CSA

The New York CSA received a full-scope review as it is the only AA in the rating area. Refer to the table in appendix A for a list of all AAs under review. Mortgage loans received the greatest emphasis in ratings, as they represented the significant majority of loans originated.

The bank did not originate a sufficient volume of loans to small businesses within the New York CSA to conduct a meaningful analysis during each analysis period and were not evaluated.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK CSA

LENDING TEST

The bank's performance under the lending test in the New York CSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the New York CSA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Competition in the AA is significant among lenders. The bank's lending market share exceeded its deposit market share in its primary product of mortgage loans.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
NY CSA	1,749	7	3	1,759	100	100

Dollar of Loans \$(000's)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
NY CSA	\$ 461,960	\$1,465	\$1,123	\$ 464,548	100	100

According to the FDIC Deposit Market Share data as of June 30, 2022, the bank had \$424.0 million in deposits with a deposit market share of 0.1 percent. The bank ranked 41st in total deposits out of 77 banks in the AA, placing the bank in the top 53.2 percent of all depository banks in the AA.

According to 2021 peer mortgage data, the bank ranked 40th out of 624 banks originating home mortgage loans in the AA. The bank had a market share of 0.5 percent and is in the top 5.8 percent of all mortgage lenders in the AA. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the New York CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans is poor.

2020-2021

The bank's level of home mortgage loans in low-income geographies in 2020-2021 is below the demographic data and significantly below aggregate performance. The bank's level of home mortgage loans in moderate-income geographies in 2020-2021 is well below the demographic data and aggregate performance.

2022

The bank's level of home mortgage loans in low- and moderate-income geographies in 2022 is well below the demographic data and significantly below aggregate performance.

Lending Gap Analysis

The OCC reviewed activity reports and lending maps to analyze home mortgage lending activities to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels. The OCC considered the high median housing value compared to income that constrains affordability of homeownership for LMI residents, and the positive contribution of flexible and innovative loan products offered by the bank.

Home Mortgage Loans

Refer to Table P in the New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans is adequate.

2020-2021

The bank's level of home mortgage loans to low-income borrowers in 2020-2021 is significantly below the demographic data and well below the aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2020-2021 is well below the demographic data and below the aggregate performance.

The significant differences between bank and aggregate performance compared to demographics is attributed to the high median housing value that limited affordability and constrained lending to LMI borrowers in the AA.

Low-income families make \$37,273 or less (50 percent of 2021 FFIEC adjusted median family income in the AA), and moderate-income families make \$59,636 (80 percent of 2021 FFIEC adjusted median family income in the AA). One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$931 for low-income borrowers and \$1,490 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,183. Therefore, low-income, and moderate-income borrowers would be significantly challenged to qualify for a mortgage loan in this AA.

2022

The bank's level of home mortgage loans to low-income borrowers in 2022 is significantly below the demographic data and below aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2022 is well below the demographic data and aggregate performance.

The significant differences between bank and aggregate performance compared to demographics is attributed to the high median housing value that limited affordability and constrained lending to LMI borrowers in the AA.

Low-income families make \$43,517 or less (50 percent of 2022 FFIEC adjusted median family income in the AA), and moderate-income families make \$69,627 (80 percent of 2022 FFIEC adjusted median family income in the AA). One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$1,088 for low-income borrowers and \$1,740 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,346. Therefore, low-income, and moderate-income borrowers would be significantly challenged to qualify for a mortgage loan in this AA.

Community Development Lending

The institution has made few, if any, CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was adequate. The bank originated three CD loans during the evaluation period which represented 2.3 percent of allocated tier one capital. The bank loaned \$1.1 million to a not-for-profit organization developing housing, education, and other community opportunities for children and adults with autism and other behavioral disorders.

Product Innovation and Flexibility

Trustco offered several flexible affordable mortgage products during the evaluation period. The bank closed five loans under the Home Town First Time Homebuyer Program totaling \$1.3 million and generated one loan totaling \$480,000 under the Home Town Hero Home Buyer Program. The bank closed 24 loans under the 95 Percent LTV Mortgage Program totaling \$8.3 million and 11 loans under the 97 Percent LTV Mortgage Program totaling \$3.5 million. Trustco also closed 115 loans under the SBA Paycheck Protection Program totaling \$5.3 million. Refer to the Description of the Institution for further detail.

INVESTMENT TEST

The bank's performance under the Investment Test in the New York CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the New York CSA is good.

The bank has a good level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank makes occasional uses of complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments					
Assessment Area	Prior Period*	Current Period	Total		Unfunded Commitments**
	\$(000's)	\$(000's)	\$(000's)	% of Total \$	\$(000's)
New York CSA	585.4	2,346.6	2,932.0	100	0

* *Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.*

** *Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.*

Qualified investments and donations that benefit the New York CSA total \$2.9 million for the evaluation period and represent 6.0 percent of allocated capital. Current period investments and grants total \$2.3 million for the evaluation period and represent 4.8 percent of allocated capital. During the evaluation period, Trustco purchased \$2.0 million in mortgage-backed securities (MBS) that supported affordable housing in the New York CSA. Additionally, Trustco made 12 donations totaling \$36,000 that benefitted the New York CSA.

There were five prior period investments outstanding during the current evaluation period and benefited the New York CSA. The prior period MBS investment had an outstanding balance of \$585,000 at the end of the evaluation period. The MBS supported affordable housing for LMI families in the AA.

Examples of CD investments in the AA include:

- The bank made an investment totaling \$2.0 million to provide affordable housing to LMI individuals.
- The bank made an investment totaling \$9,500 to support the expansion of housing opportunities for LMI individuals.
- The bank made an investment totaling \$9,000 to support an organization that builds affordable houses for low-income families.

SERVICE TEST

The bank's performance under the Service Test in New York CSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the New York CSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York CSA	100	23	100	0	4.3	34.8	60.9	4.5	10.7	29.8	54.2

Source: 2020 US Census data and bank data.

The bank has 23 branches in the AA with no branches in low-income geographies and one branch in a moderate-income geography. The percentage of the bank's branches in moderate-income geographies is below the proportion of the population living in those geographies. However, seven branches in middle- or upper-income geographies were within sufficient proximity to reasonably serve LMI areas. The bank had four branches in proximity to serve a low-income geography and six branches in proximity to serve moderate-income geographies. This contributed positively to conclusions.

The bank complements traditional service delivery methods with certain alternative retail delivery systems, such as online account opening, Zelle – a person to person payment program, deposit-taking ATMs, direct deposit, telephone banking, and mobile banking. These services had a positive impact on conclusions.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
New York CSA	0	1	-	-	-	-1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in Rockland County, which was located in an upper-income geography. The branch was closed following

poor performance. All branch customers have been redomiciled to a Trustco branch located approximately 5.5 miles away.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Lobby and drive-up hours are similar between all branches in the AA and comparable to branches in other AAs. Each of the 23 branches offer similar lobby and drive-up service hours each weekday and service hours on Saturday morning. Trustco offers free checking accounts at all branches, which benefit individuals including LMI customers.

Community Development Services

The bank provides an adequate level of CD services.

Seven bank employees provided 133 hours of service to eight different CD organizations during the evaluation period. The organizations provide community services to LMI individuals or promote economic development. Included in these services, one employee served as a board member for two organizations.

The following are examples of some of the CD services provided to the New York CSA during the evaluation period:

- One employee spent 32 hours on the board of an organization coordinating fundraisers to raise money to provide for families in need.
- One employee spent 37 hours as a team member of an organization serving food to individuals in need in Soup Kitchens and helping to clean-up the community.
- One employee spent 25 hours helping an organization put together packages of meals and clothing to provide to those in need and the elderly during the winter.

State Rating

State of Florida

CRA rating for the State of Florida: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to community credit needs.
- An adequate geographic distribution of home mortgage loans in the AA.
- An adequate distribution of loans among individuals of different income levels considering the product lines offered by the bank and performance context.
- CD loans represent poor responsiveness to AA needs. The bank made few if any CD loans.
- An adequate level of qualified investments and grants. Qualified investments exhibited adequate responsiveness to AA needs.
- Service delivery systems are reasonably accessible to portions of the AA.
- A low level of community development services.

Description of Institution's Operations in Florida

The bank's operations in the state of Florida included full counties in five AAs. The bank included Martin, Palm Beach, and Indian River counties in the Miami CSA; Charlotte, Manatee, and Sarasota counties in the North Port CSA; Lake, Orange, Osceola, Polk, Seminole, and Volusia counties in the Orlando CSA; Brevard County in the Palm Bay MSA; and Hillsborough County in the Tampa MSA.

There is a high level of competition for financial services in the state of Florida. As of June 30, 2022, FDIC Deposit Market Share data shows Trustco has 53 branches with \$1.03 billion in deposits in the state of Florida. The highest ranked depository institutions by market share were Bank of America, N.A., Wells Fargo Bank N.A., and Truist Bank who hold a combined deposit market share of 49.8 percent in the AA.

Orlando CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Orlando CSA 20-21						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	658	3.8	26.4	42.6	26.6	0.6
Population by Geography	3,408,211	2.5	25.8	43.4	28.4	0.0
Housing Units by Geography	1,501,938	2.5	25.3	45.2	27.0	0.0
Owner-Occupied Units by Geography	779,735	1.0	19.1	46.7	33.2	0.0
Occupied Rental Units by Geography	439,994	5.0	35.7	40.2	19.1	0.0
Vacant Units by Geography	282,209	2.6	26.2	48.7	22.5	0.0
Businesses by Geography	659,146	2.1	24.6	39.7	33.6	0.0
Farms by Geography	16,475	1.5	22.4	47.6	28.4	0.1
Family Distribution by Income Level	808,585	21.1	18.3	19.8	40.8	0.0
Household Distribution by Income Level	1,219,729	22.9	17.0	18.6	41.5	0.0
Median Family Income MSA - 19660 Deltona-Daytona Beach-Ormond Beach, FL MSA		\$52,220	Median Housing Value			\$148,180
Median Family Income MSA - 29460 Lakeland-Winter Haven, FL MSA		\$50,986	Median Gross Rent			\$1,013
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Families Below Poverty Level			12.5%
<i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Orlando CSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	818	3.4	25.6	42.1	27.4	1.6
Population by Geography	4,067,343	3.1	24.2	41.8	30.0	1.0
Housing Units by Geography	1,670,059	2.9	24.7	42.9	28.7	0.8
Owner-Occupied Units by Geography	911,278	1.4	19.9	44.0	34.3	0.4
Occupied Rental Units by Geography	487,284	5.3	33.2	39.8	20.3	1.5
Vacant Units by Geography	271,497	3.5	25.4	44.8	25.4	1.0
Businesses by Geography	795,980	2.3	24.5	38.1	34.1	1.0
Farms by Geography	19,145	1.9	22.8	45.5	29.2	0.6
Family Distribution by Income Level	938,177	20.6	18.4	19.8	41.1	0.0
Household Distribution by Income Level	1,398,562	22.5	17.3	18.7	41.5	0.0
Median Family Income MSA - 19660 Deltona-Daytona Beach-Ormond Beach, FL MSA		\$65,794	Median Housing Value			\$219,943
Median Family Income MSA - 29460 Lakeland-Winter Haven, FL MSA		\$59,623	Median Gross Rent			\$1,232
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$70,774	Families Below Poverty Level			9.6%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Orlando CSA represents 70.1 percent of deposits, 77.4 percent of branches, and 60.5 percent of lending in the rating area during the evaluation period. The Orlando CSA has 39 full-service branches. There is a high level of competition for financial services in the Orlando CSA. The bank ranked 19th of 50 depository institutions in the AA with 0.7 percent deposit market share.

According to 2022 Moody's Analytics data, professional and business services represent 18.6 percent of total employment; followed by leisure and hospitality services at 17.5 percent; and education and health services at 12.8 percent. Theme parks remain the AA's top employers.

According to the BLS, the non-seasonally adjusted unemployment rate for Orlando CSA has declined significantly since the pandemic. The unemployment rate declined from a high of 20.5 percent in May of 2020, to 2.4 percent in December of 2022. The unemployment rate is stabilizing as it remained below 3.0 percent during September, October, November, and December of 2022.

The OCC completed two community contacts during the evaluation period to gain an understanding of economic conditions, credit needs, and involvement of local financial institutions in the AA. Contacts included a non-profit centered in economic development, and a local government agency. Both contacts indicated a strong need for affordable housing and funding for small businesses in the area. One contact noted a strong need for financial literacy and training in the area.

North Port CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Northport CSA 20-21						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	213	1.9	23.0	47.9	25.8	1.4
Population by Geography	901,550	2.3	22.0	51.6	24.1	0.0
Housing Units by Geography	508,391	1.4	20.6	51.3	26.6	0.0
Owner-Occupied Units by Geography	278,012	0.8	16.8	54.7	27.6	0.0
Occupied Rental Units by Geography	103,754	3.8	32.2	47.1	16.9	0.0
Vacant Units by Geography	126,625	0.9	19.4	47.3	32.4	0.0
Businesses by Geography	177,360	1.2	19.0	47.1	32.7	0.0
Farms by Geography	5,135	1.9	21.1	47.5	29.4	0.0
Family Distribution by Income Level	241,750	19.0	19.4	21.1	40.5	0.0
Household Distribution by Income Level	381,766	22.8	17.2	18.3	41.6	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$62,814	Median Housing Value			\$200,760
Median Family Income MSA - 39460 Punta Gorda, FL MSA		\$54,478	Median Gross Rent			\$1,002
			Families Below Poverty Level			8.4%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: North Port CSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	264	1.9	21.2	48.5	26.9	1.5
Population by Geography	1,020,563	1.8	21.3	47.9	28.9	0.1
Housing Units by Geography	545,727	1.4	20.2	49.1	29.1	0.1
Owner-Occupied Units by Geography	320,234	1.0	17.4	50.9	30.6	0.1
Occupied Rental Units by Geography	99,128	3.3	31.4	45.3	19.9	0.1
Vacant Units by Geography	126,365	1.1	18.5	47.8	32.5	0.0
Businesses by Geography	203,092	1.1	16.1	49.1	33.5	0.2
Farms by Geography	5,773	1.6	20.6	48.4	29.0	0.3
Family Distribution by Income Level	267,705	18.4	19.8	20.9	41.0	0.0
Household Distribution by Income Level	419,362	21.9	17.7	18.9	41.5	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$77,172	Median Housing Value			\$283,266
Median Family Income MSA - 39460 Punta Gorda, FL MSA		\$63,887	Median Gross Rent			\$1,264
			Families Below Poverty Level			6.4%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The North Port CSA represents 17.3 percent of deposits, 11.3 percent of branches, and 21.4 percent of lending in the rating area. The North Port CSA has six full-service branches. There is a high level of competition for financial services in the North Port CSA. The bank ranked 27th out of 40 depository institutions in the AA with 0.5 percent of the deposit market share.

According to 2022 Moody's Analytics data, the economic drivers of the AA remain tourism and retirees. Education and health services represent 17.7 percent of total employment; followed by professional and business services at 15.3 percent; and retail trade at 14.0 percent. Grocery stores and healthcare remain the AA's top employers.

According to the BLS, the non-seasonally adjusted unemployment rate for North Port CSA has declined significantly since the pandemic. The unemployment rate declined from a high of 13.1 percent in April of 2020, to 2.5 percent in December of 2022. The unemployment rate is stabilizing as it remained at or below 3.0 percent during September, October, November, and December of 2022.

The OCC completed two community contacts during the evaluation period to gain an understanding of economic conditions, credit needs, and involvement of local financial institutions in the AA. Contacts included a non-profit centered in housing needs of the community, and a local government office. One contact noted a need for financial literacy, primarily one on one sessions to aid individuals with unique circumstances. The same contact also noted a strong need for affordable housing in the area. The other

contact indicated a strong need for small business loans and consumer loans, which would increase economic development in the area.

Scope of Evaluation in Florida

The Orlando CSA and North Port CSA received full-scope reviews; all remaining AAs received limited-scope reviews. The Orlando CSA was chosen for a full-scope review as the AA represents 70.1 percent of deposits, 77.4 percent of branches, and 60.1 percent of lending in the rating area. The North Port CSA was chosen for a full-scope review as the second largest AA with 17.3 percent of deposits, 11.3 percent of branches, and 21.4 percent of lending in the rating area. Bank-delineated areas in a CSA are combined, analyzed, and presented as one AA for the purposes of the evaluation. The Orlando CSA received greater weight based on the volume of deposits, branches, and loans.

The bank did not originate a sufficient volume of loans to small businesses within the Miami CSA, North Port CSA, Orlando CSA, Palm Bay CSA, and Tampa MSA to conduct a meaningful analysis during each analysis period and were not evaluated.

Refer to the Table in appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test Florida is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full scope reviews, the bank's performance in the Orlando CSA and North Port CSA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Competition in both AAs is significant, particularly among lenders. The bank's lending market share in the Orlando CSA was greater than its deposit market share in its primary product of mortgage loans. The bank's lending

market share in the North Port CSA exceeded its deposit market share in its primary product of mortgage loans.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Miami CSA	403	8	0	411	7.0	5.1
North Port CSA	1,253	17	0	1,270	21.6	17.3
Orlando CSA	3,539	0	1	3,540	60.2	70.1
Palm Bay MSA	216	0	0	216	3.7	1.8
Tampa MSA	441	0	0	441	7.5	5.6

**The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.*

Dollar of Loans \$(000's)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Miami CSA	92,374	450	0	92,824	7.5	5.1
North Port CSA	284,159	515	0	284,674	22.9	17.3
Orlando CSA	721,487	0	19	721,506	58.1	70.1
Palm Bay MSA	49,055	0	0	49,055	4.0	1.8
Tampa MSA	93,680	0	0	93,680	7.5	5.6

**The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.*

Orlando CSA

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data as of June 30, 2022, the bank had \$723.1 million in deposits with a deposit market share of 0.7 percent. The institution ranked 19th in total deposits out of 50 institutions in the AA, placing the bank in the top 38 percent of all depository institutions in the AA.

According to the 2021 peer mortgage data, the bank ranked 44th out of 1,302 institutions originating home mortgage loans in the AA. The bank had a market share of 0.6 percent and is in the top 3 percent of all mortgage lenders in the AA. Positive consideration is given to the bank's performance given there is a significant number of home mortgage lenders in the AA.

North Port CSA

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data as of June 30, 2022, the bank had \$178.8 million in deposits with a deposit market share of 0.5 percent. The bank ranked 27th in total deposits out of 40 institutions in the AA, placing the bank in the top 68 percent of all depository institutions in the AA.

According to the 2021 peer mortgage data, the bank ranked 40th out of 1,158 institutions originating home mortgage loans in the AA. The bank's market share of 0.7 percent is stronger than the bank's deposit market share and puts it in the top three percent of all mortgage lenders in the AA. Positive consideration is given to the bank's performance given there is a significant number of home mortgage lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Orlando CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans is adequate.

2020-2021

The bank's level of home mortgage loans in low-income geographies in 2020 to 2021 is well below the demographic data and equal to the aggregate performance. The bank's level of home mortgage loans in moderate income geographies in 2020-2021 is well below the demographic and aggregate performance.

2022

The bank's level of home mortgage loans in low-income geographies in 2022 is significantly below the demographic data and aggregate performance. The bank's level of home mortgage loans in moderate-income geographies in 2022 is well below the demographic data and aggregate performance.

North Port CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans is adequate.

2020-2021

The bank's level of home mortgage loans in low-income geographies in 2020-2021 is significantly below the demographic data and well below the aggregate performance. The bank's level of home mortgage loans in moderate-income geographies in 2020-2021 is significantly below the demographic data and significantly below the aggregate performance.

2022

The bank's level of home mortgage loans in low-income geographies in 2022 is well below the demographic data and exceeds aggregate performance. The bank's level of home mortgage loans in moderate-income geographies in 2022 is below the demographic data and near to aggregate performance.

Lending Gap Analysis

The OCC reviewed activity reports and lending maps to analyze home mortgage lending activities to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered. The OCC considered the high median housing value compared to income that constrains affordability of homeownership for LMI residents, and the positive contribution of flexible and innovative loan products offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Orlando CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans is adequate.

2020-2021

The bank's level of home mortgage loans to low-income borrowers in 2020-2021 is significantly below the demographic data and equal to aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2020-2021 is below demographic data and equal to aggregate performance.

2022

The bank's level of home mortgage loans to low-income borrowers in 2022 is significantly below the demographic data and well below aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2022 is well below the demographic data and near to aggregate performance.

The significant differences between the bank and aggregate performance compared to demographics is attributed to the high median housing value that limited affordability and constrained lending to LMI borrowers in the AA.

Low-income families make \$35,387 (50 percent of 2022 FFIEC adjusted median family income in the AA) or less. One method used to determine housing affordability assumes a maximum monthly

principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$885 for low-income borrowers and \$1,415 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,181. Therefore, low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in this AA.

North Port CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans is adequate.

2020-2021

The bank's level of home mortgage loans to low-income borrowers in 2020-2021 is significantly below the demographic data and equal to the aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2020-2021 is equal to demographic data and exceeds aggregate performance.

2022

The bank's level of home mortgage loans to low-income borrowers in 2022 is well below the demographic data and exceeds aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2022 is near the demographic data and exceeds aggregate performance.

The differences between the bank and aggregate performance compared to demographics is attributed to the high median housing value that limited affordability and constrained lending to LMI borrowers in the AA.

Low-income families make \$38,586 (50 percent of 2022 FFIEC adjusted median family income in the AA) or less. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$965 for low-income borrowers and \$1,543 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,521. Therefore, low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in this AA.

Community Development Lending

The bank has made few if any CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Orlando CSA

The level of CD lending was adequate. The bank originated one CD loan during the evaluation period, which represented a nominal percent of allocated tier one capital. The loan was responsive to the identified needs in the AA. The purpose of the loan was for the renewal of a working capital line of credit. The loan supported community services for LMI individuals and primarily serves LMI housing needs.

North Port CSA

The bank did not originate any CD loans in the AA during the evaluation period. This had a neutral impact.

Product Innovation and Flexibility

Trustco offered several flexible affordable mortgage products during the evaluation period. The bank closed four loans under the Home Town First Time Homebuyer Program totaling \$704,225 and generated three loans totaling \$1.9 million under the Home Town Hero Home Buyer Program. The bank closed 95 loans under the 95 Percent LTV Mortgage Program totaling \$30.7 million and 42 loans under the 97 Percent LTV Mortgage Program totaling \$11.7 million. Trustco also closed two loans under the SBA Loan Program totaling \$350,000 and 139 loans under the SBA Paycheck Protection Program totaling \$7.2 million. Refer to the Description of the Institution for further detail.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Miami CSA, Palm Bay MSA, and Tampa MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through P in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in state of Florida is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the North Port CSA is good. Based on a full-scope review, the bank's performance in the Orlando CSA is adequate.

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments					
Assessment Area	Prior Period*	Current Period	Total		Unfunded Commitments*
	\$(000's)	\$(000's)	\$(000's)	% of Total \$	\$(000's)
Miami CSA	189.4	10.5	199.9	5.7	0
North Port CSA	254.7	906.4	1,161.1	33.4	0
Orlando CSA	1,445.9	84.2	1,530.1	44.0	0
Palm Bay MSA	363.4	0.25	363.7	10.5	0
Tampa MSA	187.3	2.5	189.8	5.5	0
Statewide	0	33	33	0.9	0

* *Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.*

** *Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.*

Orlando CSA

Qualified investments and donations that benefit the Orlando CSA total \$1.5 million for the evaluation period and represent 2 percent of allocated capital. During the evaluation period, Trustco made ten donations totaling \$84,000 that benefitted the Orlando CSA.

There were five prior period investments outstanding during the current evaluation period that benefitted the Orlando CSA. The prior period MBS investment had an outstanding balance of \$3.3 million at the end of the evaluation period. The MBS supported affordable housing for LMI families in the AA.

Examples of CD investments in the AA include:

- The bank made an investment totaling \$53,000 to provide turkeys to food pantries for Thanksgiving dinners.
- The bank made an investment totaling \$8,500 to an organization that provides affordable housing for LMI families.
- The bank made an investment totaling \$7,000 to sponsor a fundraiser benefiting LMI children.

North Port CSA

Qualified investments and donations that benefit the North Port CSA total \$1.2 million for the evaluation period and represent 5.8 percent of allocated capital. During the evaluation period, Trustco purchased \$911,000 in MBS that supported affordable housing in the North Port CSA. Additionally, Trustco made two donations totaling \$2,000 that benefitted the North Port CSA.

There were three prior period investments outstanding during the current evaluation period and benefitted the North Port CSA. The prior period MBS investment had an outstanding balance of \$254,000 at the end of the evaluation period. The MBS supported affordable housing for LMI families in the AA. The MBS is considered a complex investment.

Examples of CD investments in the AA include:

- The bank made an investment of \$911,000 to provide affordable housing to LMI individuals.
- The bank made an investment of \$1,000 to a food bank to support resources for LMI individuals.

- The bank made an investment of \$1,000 to a hospital to support resources for LMI individuals during the pandemic.

Statewide

The bank also engaged in statewide affordable housing, economic development, and natural disaster assistance, totaling \$33,000, that benefited the greater statewide area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Miami CSA, Palm Bay CSA, and Tampa CSA is similar to the bank’s performance in the full-scope AAs under the Investment Test.

SERVICE TEST

The bank’s performance under the Service Test in the state of Florida is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank’s performance in the Orlando CSA and North Port CSA is adequate.

Retail Banking Services

Service delivery systems in the Orlando CSA and the North Port CSA are reasonably accessible to geographies and individuals of different income levels. The bank’s limited presence in North Port CSA was considered in the conclusions about performance.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Miami CSA	5.1	3	5.7	0	33.3	33.3	33.3	4.9	25.7	35	33.1
North Port CSA	17.3	6	11.3	0	0	83.3	16.7	1.8	21.3	47.9	28.9
Orlando CSA	70.1	41	77.4	2.4	14.6	36.7	46.3	3.1	24.2	41.8	30
Palm Bay MSA	1.8	1	1.9	0	0	100	0	2.6	21.4	45	30.5
Tampa MSA	5.6	2	3.8	0	50	50	0	5.9	24.1	33.3	35.6

Orlando CSA

The bank has 41 branches in the AA with one branch in low-income geographies and six branches in moderate-income geographies. The percentage of the bank’s branches in low- and moderate-income geographies is below the population living in those geographies. However, 22 branches in middle- or upper-income geographies were within sufficient proximity to reasonably serve LMI areas. The bank has five branches in proximity to serve low-income geographies and 17 branches in proximity to serve moderate-income geographies. This contributed positively to conclusions.

North Port CSA

The bank has six branches in the AA, with no branches in low- or moderate-income geographies. The bank operates too few branches in the AA to conclude on the percentage distribution relative to the population living in low- or moderate-income geographies. However, four branches in middle-income geographies were within sufficient proximity to reasonably serve moderate-income areas.

The bank complements traditional service delivery methods in its AAs with certain alternative retail delivery systems, such as online account opening, Zelle – a person to person payment program, deposit-taking ATMs, direct deposit, telephone banking, and mobile banking. These services had a neutral impact on conclusions.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Orlando CSA	1	1	-	-1	+1	-

To the extent changes have been made, the bank’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to LMI individuals. The bank opened one branch in a middle-income geography and closed one in a moderate-income geography in the Orlando CSA. The bank maintained three Trustco bank branch locations within five miles and several other competitors are located within one mile of this location and will continue to service the community. The bank did not open or close any branches in the North Port CSA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly moderate-income geographies and LMI individuals. All branches operate during similar banking hours.

Lobby and drive-up hours are similar between all branches in the AAs and comparable to branches in other AAs. Each of the branches offer similar lobby and drive-up service hours each weekday and service hours on Saturday morning. Trustco offers free checking accounts at all branches, which benefit individuals including LMI customers.

Community Development Services

The institution provides a few, if any, CD services.

Orlando CSA

The bank provides a few, if any, CD services that were responsive to needs in the AA. During the evaluation period, six employees provided their expertise to six CD organizations for a total of 38.5 hours. The organizations provide community services to LMI individuals or promote economic development.

The following are examples of some of the CD services provided to the Orlando MSA during the evaluation period:

- One employee spent fifteen hours assisting an organization provide mock interviews and resume feedback to the community.
- One employee spent five hours helping an organization in assisting veterans with housing, food, and clothing.

North Port CSA

The bank provides a few, if any, CD services that were responsive to needs in the AA. During the evaluation period, one employee provided their expertise to two CD organizations for a total of three service hours. The organizations provide community services to LMI individuals or promote economic development.

- The employee spent three hours speaking about financial wellness.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Miami CSA, Palm Bay MSA, and the Tampa MSA is stronger than the bank's performance under the Service Test in the full-scope areas based on the bank's branch distribution in these AAs. This contributed positively to overall conclusions.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts: 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 that support this rating include:

- Lending levels reflect excellent responsiveness to community credit needs.
- A very poor geographic distribution of home mortgage loans in the AA.
- An adequate distribution of loans among individuals of different income levels considering the product lines offered by the bank and performance context.
- CD loans represent poor responsiveness to AA needs. The bank made few if any CD loans.
- A good level of qualified investments and grants. Qualified investments exhibited adequate responsiveness to AA needs.
- Service delivery systems are unreasonably inaccessible to portions of the AA.
- A relatively high level of community development services.

Description of Institution's Operations in Massachusetts

The bank has one AA in the state of Massachusetts, the Pittsfield MSA AA (Pittsfield MSA) which consist of one county in the MSA, Berkshire County. As of June 30, 2022, FDIC branch data, the bank operates one branch in the state of Massachusetts with deposits totaling approximately \$29.0 million, which accounts for less than one percent of total bank deposits.

Pittsfield MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsfield MSA 20-21						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	7.7	10.3	51.3	30.8	0.0
Population by Geography	129,288	8.4	11.4	50.5	29.7	0.0
Housing Units by Geography	68,385	9.0	10.7	50.5	29.8	0.0
Owner-Occupied Units by Geography	37,899	3.1	10.2	55.5	31.2	0.0
Occupied Rental Units by Geography	17,341	23.9	15.9	40.3	19.9	0.0
Vacant Units by Geography	13,145	6.1	5.5	49.8	38.6	0.0
Businesses by Geography	11,818	14.2	6.5	41.8	37.4	0.0
Farms by Geography	432	2.1	4.2	48.4	45.4	0.0
Family Distribution by Income Level	33,021	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	55,240	25.2	15.3	17.3	42.2	0.0
Median Family Income MSA - 38340 Pittsfield, MA MSA		\$66,604	Median Housing Value			\$227,590
			Median Gross Rent			\$771
			Families Below Poverty Level			9.7%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsfield MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	2.5	20.0	55.0	22.5	0.0
Population by Geography	129,026	2.6	19.5	52.8	25.0	0.0
Housing Units by Geography	69,149	3.5	18.9	54.0	23.6	0.0
Owner-Occupied Units by Geography	38,359	0.3	15.4	56.5	27.8	0.0
Occupied Rental Units by Geography	16,427	11.6	30.6	45.5	12.3	0.0
Vacant Units by Geography	14,363	2.5	14.7	57.3	25.5	0.0
Businesses by Geography	14,148	17.5	13.0	46.0	23.4	0.0
Farms by Geography	479	4.0	5.4	62.4	28.2	0.0
Family Distribution by Income Level	31,780	19.7	17.8	22.1	40.4	0.0
Household Distribution by Income Level	54,786	25.4	15.1	17.6	41.9	0.0
Median Family Income MSA - 38340 Pittsfield, MA MSA		\$82,207	Median Housing Value			\$242,969
			Median Gross Rent			\$899
			Families Below Poverty Level			5.9%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

There is a moderate level of competition for financial services in the Pittsfield MSA. According to June 30, 2022, FDIC deposit market share data, the AA consists of ten financial institutions operating 51 offices. Trustco ranked 10th with 0.59 percent of the deposit market share. The top three institutions include Berkshire Bank, Adams Community Bank, and TD Bank, which account for 67.5 percent of the total deposit market share.

According to 2022 Moody's Analytics data, education and health services represent 25.7 percent of total employment; followed by government at 13.8 percent; and leisure and hospitality services at 12.8 percent. Medical centers remain the AA's top employers.

According to the BLS, the non-seasonally adjusted unemployment rate for Massachusetts has declined significantly since the pandemic. The unemployment rate declined from a high of 16.5 percent in April of 2020, to 3.3 percent in December of 2022. The unemployment rate is stabilizing as it remained below 3.5 percent during September, October, November, and December of 2022.

The OCC completed two community contacts during the evaluation period to gain an understanding of economic conditions, credit needs, and involvement of local financial institutions in the AA. Contacts included a non-profit housing development organization and a regional government office. Both contacts indicated the area suffers from a lack of affordable housing. One contact discussed financial literacy courses and down payment assistance programs as needs of the community.

Scope of Evaluation in Massachusetts

The Pittsfield MSA received a full-scope review, as it is the only AA in the rating area. Refer to the table in Appendix A for a list of all AAs under review. Mortgage loans received the greatest emphasis in ratings, as they represented the majority of loans originated.

The bank did not originate a sufficient volume of loans to small businesses within the Pittsfield MSA to conduct a meaningful analysis during each analysis period and were not evaluated.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

The bank's performance under the Lending Test in Massachusetts is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsfield MSA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Competition in the AA is moderate. The bank's lending market share was significantly greater than its deposit market share in its primary product of mortgage loans.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Pittsfield MSA	121	0	0	121	100	100

Dollar of Loans \$(000's)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Pittsfield MSA	\$ 23,171	0	0	\$ 23,171	100	100

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data as of June 30, 2022, the bank had \$39.8 million in deposits with a deposit market share of 0.6 percent. The bank ranked 10th in total deposits out of ten institutions in the AA, placing the bank at the bottom of all depository institutions in the AA.

According to the 2021 peer mortgage data, the bank ranked 19th out of 241 institutions originating home mortgage loans in the AA. The bank had a market share of 0.9 percent and is in the top 7.9 percent of all mortgage lenders in the AA. Positive consideration is given to the bank's performance given there is a high number of home mortgage lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a very poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans is very poor.

2020-2021

The bank's level of home mortgage loans to low-income geographies in 2020-2021 is significantly below the demographic data and aggregate performance as the bank did not originate any loans in low-income geographies. The bank's level of home mortgage loans to moderate-income geographies is significantly below the demographic data and well below aggregate performance.

2022

The bank did not have a sufficient volume of loans in 2022 to complete an analysis.

Lending Gap Analysis

The OCC reviewed activity reports and lending maps to analyze home mortgage lending activities to identify any gaps in the geographic distribution of loans in the AA. The OCC did not identify any unexplained conspicuous gaps in any of the areas reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels, given the product lines offered by the institution. The OCC considered the high median housing value compared to income that constrains affordability of homeownership for LMI residents, and the positive contribution of flexible and innovative loan products offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans is adequate.

2020-2021

The bank's level of home mortgage loans to low-income borrowers in 2020-2021 is well below the demographic data and equal to aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2020-2021 is near to the demographic data and below aggregate performance.

2022

The bank did not have a sufficient volume of loans in 2022 to complete an analysis.

The significant differences between the bank's and aggregate performance compared to demographics is attributed to the high median housing value that limited affordability and constrained lending to LMI borrowers in the AA.

Low-income families make \$41,103 (50 percent of 2022 FFIEC adjusted median family income in the AA) or less. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$1,027 for low-income borrowers and \$1,644 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,304. Therefore, low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in this AA.

Community Development Lending

The bank has made few if any CD loans. The bank did not originate any CD loans during the evaluation period.

Refer to Tables O through P in the state of Massachusetts section of appendix D for the facts and data that support these conclusions.

Product Innovation and Flexibility

Trustco offered several flexible affordable mortgage products during the evaluation period. The bank closed three loans under the Home Town First Time Homebuyer Program totaling \$397,725 and generated six loans totaling \$1.4 million under the 95 Percent LTV Mortgage Program. Trustco also closed seven loans under the SBA Paycheck Protection Program totaling \$322,500. Refer to the Description of the Institution for further detail.

INVESTMENT TEST

The bank’s performance under the Investment Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Pittsfield MSA is good.

The bank has an excellent level of qualified CD investments and grants, although not through those that are not routinely provided by private investors, nor in a leadership position.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments					
Assessment Area	Prior Period*	Current Period	Total		Unfunded Commitments**
	\$(000's)	\$(000's)	\$(000's)	% of Total \$	\$(000's)
Pittsfield MSA	208.4	173.3	381.7	100	0

* *Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.*

** *Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.*

Qualified investments and donations that benefit the Pittsfield MSA total \$381,700 for the evaluation period and represent 11.8 percent of allocated capital. During the evaluation period, Trustco purchased \$164,000 in MBS that supported affordable housing in the Pittsfield MSA. Additionally, Trustco made three donations totaling \$9,000 that benefitted the Pittsfield MSA. The donations supported nonprofit organizations with an affordable housing purpose.

There was one prior period investment outstanding during the current evaluation period and benefited the Pittsfield MSA. The prior period MBS investment had an outstanding balance of \$208,400 at the end of the evaluation period. The MBS supported affordable housing for LMI families in the AA.

Examples of CD investments in the AA include:

- The bank made an investment totaling \$164,000 to provide affordable housing to LMI individuals.
- The bank made an investment totaling \$9,000 to support the expansion of housing opportunities for LMI individuals.

SERVICE TEST

The bank’s performance under the Service Test in Massachusetts is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Pittsfield MSA is adequate.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Pittsfield MSA	100	1	100	0	0	100	0	2.6	19.5	52.8	25

The bank has one branch in the AA in a middle-income geography. The bank operates no branches in LMI geographies. However, there were only seven low- and moderate-income geographies in the AA. The branch was within sufficient proximity to reasonably serve an LMI area.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as online account opening, Zelle – a person to person payment program, deposit-taking ATMs, direct deposit, telephone banking, and mobile banking. These services had a neutral impact on conclusions.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Pittsfield MSA	0	3	-	-	-1	-2

To the extent changes have been made, the institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed three branches in Berkshire County, which were located in upper- and middle-income geographies. The branches were closed following poor performance based on a profitability study. All branch customers have been redomiciled to a Trustco branch located six to twenty-one miles away. Several competitors located within one mile of these locations will continue to service the community.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals.

Lobby and drive-up hours are comparable to branches in other AAs. The branch offers similar lobby and drive-up service hours each weekday and service hours on Saturday morning. Trustco offers free checking accounts at the branch, which benefit individuals including LMI customers.

Community Development Services

The bank provides a relatively high level of CD services. During the evaluation period, two employees provided their expertise to two CD organizations for a total of 22 hours. The organizations provide community services to LMI individuals or promote economic development.

One employee spent 20 hours serving on the board of directors for an organization that provides affordable housing and revitalizes the community.

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to community credit needs.
- An adequate geographic distribution of home mortgage loans in the AA.
- A good distribution of loans among individuals of different income levels considering the product lines offered by the bank and performance context.
- CD loans represent poor responsiveness to AA needs. The bank made few if any CD loans.
- An adequate level of qualified investments and grants. Qualified investments exhibited adequate responsiveness to AA needs.
- Service delivery systems are readily accessible to portions of the AA.
- A good level of community development services.

Description of Institution's Operations in State of New York

The bank's operations in the state of New York included ten full counties in two AAs. The bank included Albany, Rensselaer, Saratoga, Schenectady, and Schoharie counties that comprise all the Albany-Schenectady-Troy, NY MSA; Warren, and Washington Counties that comprise all of the Glen Falls, NY MSA; Montgomery County which represents all of the Amsterdam, NY MD; Columbia County which comprises all of the Hudson, NY MD. These counties are part of the Albany-Schenectady, NY CSA (Albany CSA). The bank also maintains operations in Greene County in NY Non-MSA. The Albany CSA represents 97.3 percent of deposits and 97.0 percent of branches in the rating area.

The bank operated 65 branches or 44.8 percent of total bank branches as of December 31, 2022. Based on FDIC Deposit Market Share data as of June 30, 2022, the bank had \$3.8 billion in deposits in the AA representing 70.5 percent of its total bank deposits. The bank ranked 3rd of 24 institutions with 9.0 percent market share. Key Bank and Citizens Bank account for 40.5 percent of the deposit market share in the AA.

Albany CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albany CSA 20-21						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	275	7.6	17.5	50.5	22.9	1.5
Population by Geography	1,067,921	6.1	16.2	53.1	23.7	0.9
Housing Units by Geography	496,872	6.8	17.3	53.8	22.0	0.1
Owner-Occupied Units by Geography	279,484	2.3	12.6	57.6	27.5	0.0
Occupied Rental Units by Geography	142,764	13.3	24.6	46.4	15.5	0.2
Vacant Units by Geography	74,624	11.2	20.9	54.0	13.6	0.4
Businesses by Geography	98,188	11.0	12.8	49.1	26.8	0.3
Farms by Geography	3,502	1.5	9.3	62.7	26.5	0.1
Family Distribution by Income Level	258,572	20.0	17.5	22.2	40.3	0.0
Household Distribution by Income Level	422,248	23.8	15.6	18.7	41.9	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$81,103	Median Housing Value			\$195,346
Median Family Income MSA - 24020 Glens Falls, NY MSA		\$64,495	Median Gross Rent			\$904
Median Family Income Non-MSAs - NY		\$59,570	Families Below Poverty Level			7.6%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albany CSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	332	7.2	17.8	47.9	24.4	2.7
Population by Geography	1,137,403	6.9	16.2	48.3	27.0	1.6
Housing Units by Geography	536,939	7.3	18.0	48.0	25.6	1.1
Owner-Occupied Units by Geography	298,343	2.8	13.2	51.6	32.2	0.3
Occupied Rental Units by Geography	159,423	14.3	23.6	42.9	16.7	2.5
Vacant Units by Geography	79,173	9.9	25.0	44.9	18.9	1.3
Businesses by Geography	105,558	6.0	12.5	46.6	27.5	7.4
Farms by Geography	3,863	1.1	12.1	57.7	28.2	1.0
Family Distribution by Income Level	275,456	20.9	17.4	21.3	40.3	0.0
Household Distribution by Income Level	457,766	23.8	16.2	17.8	42.2	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$95,438	Median Housing Value			\$208,294
Median Family Income MSA - 24020 Glens Falls, NY MSA		\$77,435	Median Gross Rent			\$1,013
Median Family Income Non-MSAs - NY		\$69,021	Families Below Poverty Level			6.4%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to 2022 Moody's Analytics data, government represent 21.7 percent of total employment; followed by education and health services at 20.1 percent; and professional and business services at 12.8 percent. Medical centers remain the AA's top employers.

According to the BLS, the non-seasonally adjusted unemployment rate for the Albany CSA has declined significantly since the pandemic. The unemployment rate declined from a high of 14.6 percent in April of 2020, to 2.9 percent in December of 2022. The unemployment rate is stabilizing as it remained below 3.0 percent during September, October, November, and December of 2022.

The OCC completed three community contacts during the evaluation period to gain an understanding of economic conditions, credit needs, and involvement of local financial institutions in the AA. Contacts included non-profits focused on economic development, social service organizations, and a community meeting session. A majority of contacts indicated a need for affordable housing and more affordable credit products for homeowners and small businesses. One contact noted a strong need for credit building products and down payment assistance programs to make homes more accessible. Another contact indicated a need for more favorable loan terms for small businesses and better credit products to allow businesses to own property, versus renting.

Scope of Evaluation in New York State

The Albany CSA received a full-scope review and the NY Non-MSA received a limited-scope review. Refer to the table in appendix A for a list of all AAs under review. The Albany CSA was chosen for full-scope review as the AA represents 97.6 percent of deposits and 98.5 percent of branches in the rating area. Bank-delineated areas in a CSA are combined, analyzed, and presented as one AA for the purposes of the evaluation. The Albany CSA received greater weight based on the volume of deposits, branches, and loans. Mortgage loans received greater weight as they represented the majority of loans originated.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

The bank's performance under the Lending Test in New York is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Albany CSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Competition in the AA is significant, particularly among lenders. The bank's lending market share rank in Albany CSA was greater than its deposit market share rank in its primary product of mortgage loans.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State Loans	%State Deposits
Albany CSA	7,252	962	7	8,221	98	97
NY Non- MSA	152	0	0	152	2	3

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar of Loans * \$(000's)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State* Loans	%State Deposits
Albany CSA	1,378,301	31,475	422,200	1,831,976	99	97
NY Non- MSA	25,630	0	0	25,630	1	3

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data as of June 30, 2022, the bank had \$3.0 billion in deposits with a deposit market share of 9.1 percent. The bank ranked 3rd in total deposits out of 24 institutions in the AA, placing the bank in the top 12.5 percent of all depository institutions in the AA.

According to the 2021 peer mortgage data, the bank ranked 4th out of 348 institutions originating home mortgage loans in the AA. The bank had a market share of 6.7 percent and is in the top 1.1 percent of all mortgage lenders in the AA. Positive consideration is given to the bank's performance given there is a significant number of home mortgage lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans is adequate.

2020-2021

The bank's level of home mortgage loans in low-income geographies in 2020-2021 is below the demographic data and well below aggregate performance. The bank's level of home mortgage loans in moderate-income geographies in 2020-2021 is well below the demographic data and aggregate performance.

2022

The bank's level of home mortgage loans in low-income geographies in 2022 exceeds the demographic data and equal to aggregate performance. The bank's level of home mortgage loans in moderate-income geographies in 2022 is well below the demographic data and aggregate performance.

Small Loans to Businesses

Refer to Table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small business loans is adequate.

2020-2021

The bank's level of small loans to businesses in low-income geographies in 2020-2021 is well below the demographic data and below aggregate performance. The bank's level of small loans to businesses in moderate-income geographies in 2020-2021 is well below the demographic data and near to aggregate performance.

2022

The bank's level of small loans to businesses in low-income geographies in 2022 exceeds the demographic data. The bank's level of small loans to businesses in moderate-income geographies in 2022 is equal to demographic data.

Lending Gap Analysis

The OCC reviewed activity reports and lending maps to analyze home mortgage lending activities to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The OCC considered the high median housing value compared to income that constrains affordability of homeownership for LMI residents, and the positive contribution of flexible and innovative loan products offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans is good.

2020-2021

The bank's level of home mortgage loans to low-income borrowers in 2020-2021 is well below the demographic data and equal to aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2020-2021 exceeds demographic data and is near to aggregate performance.

2022

The bank's level of home mortgage loans to low-income borrowers in 2022 is below the demographic data and equal to aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2022 exceeds the demographic data and equal to aggregate performance.

The differences between the bank and aggregate performance compared to demographics is attributed to the high median housing value that limited affordability and constrained lending to LMI borrowers in the AA.

Low-income families make \$47,719 (50 percent of 2022 FFIEC adjusted median family income in the AA) or less. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$1,193 for low-income borrowers and \$1,909 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,118. Therefore, a majority of low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in this AA.

Small Loans to Businesses

Refer to Table R in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small business loans is poor.

2020-2021

The bank's level of small loans to small businesses in 2020-2021 is significantly below the demographic data and aggregate performance. Trustco's small business lending in this AA was primarily SBA Paycheck Protection Program loans.

2022

The bank's level of small loans to small businesses in 2022 is well below the demographic data.

Community Development Lending

The institution has made few if any CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank has made few if any CD loans within the AA. The bank originated or renewed seven loans within the AA which represented 0.1 percent of allocated tier one capital. The loans were responsive to the identified needs in the AA.

Examples of the loans include:

- The bank originated a loan to a social service partnership to provide working capital and business payroll for \$108,100. The business serves thousands of high-need individuals and address public health needs.
- The bank renewed a line of credit for a regional food bank which provides food to LMI individuals for \$100,000.

Product Innovation and Flexibility

Trustco offered several flexible affordable mortgage products during the evaluation period. The bank closed 127 loans under the Home Town First Time Homebuyer Program totaling \$18.5 million and generated eight loans totaling \$2.2 million under the Home Town Hero Home Buyer Program. The bank closed 221 loans under the 95 Percent LTV Mortgage Program totaling \$52.3 million and 76 loans under the 97 Percent LTV Mortgage Program totaling \$16.8 million. Trustco also closed one loan under the SBA Loan Program totaling \$252,500 and 733 loans under the SBA Paycheck Protection Program totaling \$54.4 million. Refer to the Description of the Institution for further detail.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the NY Non MSA is consistent with the bank's overall performance under the Lending Test in the full-scope AA.

Refer to Tables O through R in the state of New York section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in New York is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Albany CSA is adequate.

The institution has an adequate level of qualified CD investments and grants, although not in a leadership position, nor through those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally makes innovative and/or complex investments to support CD initiatives.

Qualified Investments					
Assessment Area	Prior Period*	Current Period	Total		Unfunded Commitments**
	\$(000's)	\$(000's)	\$(000's)	% of Total \$	\$(000's)
Albany CSA	3,252.0	12,558.4	15,810.4	96.1	0
NY Non-MSA	0	636.1	636.1	3.9	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments and donations that benefit the Albany CSA total \$15.8 million for the evaluation period and represent 3.7 percent of allocated capital. During the evaluation period, Trustco purchased \$11.6 million in MBS that supported affordable housing in the Albany CSA. Additionally, Trustco made 54 donations totaling \$1.0 million that benefitted the Albany CSA. The donations supported organizations with a community service purpose, affordable housing, and natural disaster assistance. Approximately \$536,000 of donations were to cover medical expenses for individuals without health insurance.

There were eight prior period investments outstanding during the current evaluation period and benefited the Albany CSA. The prior period mortgage-backed security (MBS) investment had an outstanding balance of \$3.3 million at the end of the evaluation period. The MBS supported affordable housing for LMI families in the AA.

Examples of CD investments in the AA include:

- The bank made an investment totaling \$11.6 million to provide affordable housing to LMI individuals.
- The bank made an investment totaling \$536,000 to an organization to aid in medical expenses of individuals without health insurance.
- The bank made an investment totaling \$21,600 to an organization that promotes financing to small business owners in LMI areas.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the New York Non-MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area due to poor investment in the AA. Performance in the limited-scope AA has a neutral impact on overall conclusions.

SERVICE TEST

The bank’s performance under the Service Test in New York is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Albany CSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Albany CSA	97.6	60	92.3	3.3	20	61.7	15	6.9	16.2	48.3	27
NY Non-MSA	2.5	5	7.7	20	20	0	60	3.7	5.3	63.1	23.4

The bank has 60 branches in the Albany CSA with two branches in low-income and twelve branches in moderate-income geographies. The percentage of the bank’s branches in low-income geographies is less than the proportion of the population living in those geographies. The percentage of the bank’s branches in moderate-income geographies exceeds the proportion of the population living in those geographies. Additionally, twenty-three branches in middle- or upper-income geographies were within sufficient proximity to reasonably serve LMI areas. The bank had eleven branches in proximity to serve a low-

income geography and twelve branches in proximity to serve moderate-income geographies. This contributed positively to conclusions.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as online account opening, Zelle – a person to person payment program, deposit-taking ATMs, direct deposit, telephone banking, and mobile banking. These services had a neutral impact on conclusions.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Albany CSA	1	1	-1	-	-	+1
NY Non-MSA	0	1	-	-1	-	-

To the extent that changes have been made, the bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

The bank closed one branch and opened one branch within the Albany CSA. The branch opened was within a high-income geography and the branch closed was within a low-income geography. Branch customers were redomiciled to a Trustco branch located one mile away. There are several Trustco bank branches within five miles and other competitors within one mile of this location that will continue to serve the community. This had a neutral effect on the conclusions.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate- income geographies and/or individuals. All branches operate during similar banking hours.

Lobby and drive-up hours are similar between all branches in the AA and comparable to branches in other AAs. Each of the 60 branches offer similar lobby and drive-up service hours each weekday and service hours on Saturday morning. Trustco offers free checking accounts at all branches, which benefit individuals including LMI customers.

Community Development Services

The institution is a leader in providing CD services.

Forty-five employees, including senior management, provided technical assistance to 41 CD organizations totaling 1,645 hours during the evaluation period. The organizations provide community services to LMI individuals or promote economic development.

The following are examples of some of the CD services provided to the Albany MSA during the evaluation period:

- One employee spent 475 serving as the president of an organization which aimed to provide community services to a LMI community.
- One employee spent 120 hours serving as a board member for an organization that serves people in the community with intellectual and developmental disabilities.
- One employee spent 80 hours volunteering with an organization to help prepare taxes for LMI individuals and families.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Service Test in the New York Non-MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Vermont

CRA rating for the State of Vermont: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include

- Lending levels reflect excellent responsiveness to community credit needs.
- A poor geographic distribution of home mortgage loans in the AA.
- An excellent distribution of loans among individuals of different income levels considering the product lines offered by the bank and performance context.
- CD loans represent poor responsiveness to AA needs. The bank made no CD loans.
- An adequate level of qualified investments and grants. Qualified investments exhibited adequate responsiveness to AA needs.
- Service delivery systems are accessible to portions of the AA.

Description of Institution's Operations in Vermont Non-MSA

The bank has one AA in the state of Vermont, the Vermont Non-MSA AA (VT Non-MSA), that consists of Bennington County. As of June 30, 2022, FDIC branch data, the bank operates one branch in the state of Vermont with deposits totaling approximately \$13 million or less than one percent of total deposits.

Vermont Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: VT Non-MSA 20-21						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	8.3	91.7	0.0	0.0
Population by Geography	36,589	0.0	13.4	86.6	0.0	0.0
Housing Units by Geography	20,919	0.0	11.0	89.0	0.0	0.0
Owner-Occupied Units by Geography	11,243	0.0	7.9	92.1	0.0	0.0
Occupied Rental Units by Geography	4,393	0.0	28.8	71.2	0.0	0.0
Vacant Units by Geography	5,283	0.0	2.7	97.3	0.0	0.0
Businesses by Geography	4,198	0.0	18.1	81.9	0.0	0.0
Farms by Geography	228	0.0	5.7	94.3	0.0	0.0
Family Distribution by Income Level	10,054	23.9	18.1	22.7	35.3	0.0
Household Distribution by Income Level	15,636	23.9	17.8	18.8	39.6	0.0
Median Family Income Non-MSAs - VT		\$64,849	Median Housing Value			\$236,007
			Median Gross Rent			\$871
			Families Below Poverty Level			9.6%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: VT Non-MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	8.3	66.7	25.0	0.0
Population by Geography	37,347	0.0	6.0	72.4	21.6	0.0
Housing Units by Geography	21,189	0.0	4.5	73.1	22.4	0.0
Owner-Occupied Units by Geography	10,699	0.0	4.2	71.9	23.9	0.0
Occupied Rental Units by Geography	3,886	0.0	10.7	70.7	18.6	0.0
Vacant Units by Geography	6,604	0.0	1.3	76.4	22.3	0.0
Businesses by Geography	4,907	0.0	3.9	66.3	29.8	0.0
Farms by Geography	261	0.0	1.9	69.7	28.4	0.0
Family Distribution by Income Level	8,987	18.8	18.4	21.9	40.9	0.0
Household Distribution by Income Level	14,585	25.2	16.0	17.3	41.5	0.0
Median Family Income Non-MSAs - VT		\$77,189	Median Housing Value			\$236,623
			Median Gross Rent			\$879
			Families Below Poverty Level			6.6%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

There is a moderate level of competition for financial services in the VT Non-MSA. According to the June 30, 2022, FDIC deposit market share data, there are eight financial institutions operating 17 offices within the VT Non-MSA. Trustco ranked 7th with a deposit market share of 1.1 percent. The Bank of Bennington, Berkshire Bank, Manufacturers and Traders Trust Company, and TD Bank account for 82.9 percent of the deposit market share within the Non-MSA.

According to 2022 Moody's Analytics data, education and health services represent 20.7 percent of total employment; followed by government at 17.8 percent; and retail trade at 11.8 percent. Universities remain the AA's top employers.

According to the BLS, the non-seasonally adjusted unemployment rate for Vermont has declined significantly since the pandemic. The unemployment rate declined from a high of 13.8 percent in April of 2020, to 2.7 percent in December of 2022. The unemployment rate is stabilizing as it remained below 3.0 percent during September, October, November, and December of 2022.

The OCC completed two community contacts during the evaluation period to gain an understanding of economic conditions, credit needs, and involvement of local financial institutions in the AA. Contacts included a local government office and a local financial institution. One contact discussed the need for affordable housing, as population growth has outpaced the number of available homes. The other contact discussed a need for flexible lending programs to small businesses and financial literacy education programs.

Scope of Evaluation in Vermont

The VT Non-MSA received a full-scope review as it is the only AA in the rating area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

The bank's performance under the Lending Test in Vermont is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the VT Non-MSA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Competition in the AA is moderate. The bank's lending market share significantly exceeded its deposit market share in mortgage loans.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Vermont Non-MSA	60	0	0	60	100	100

Dollar Volume of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Vermont Non-MSA	\$8,167	0	0	\$8,167	100	100

According to the FDIC Deposit Market Share data as of June 30, 2022, the bank had \$12.6 million in deposits with a deposit market share of 1.1 percent. The institution ranked 7th in total deposits out of eight institutions in the AA, placing the bank in the bottom 13 percent of all depository institutions in the AA.

According to the 2021 peer mortgage data, the bank ranked 9th out of 134 institutions originating home mortgage loans in the AA. The bank had a market share of 2.5 percent and is in the top 7 percent of all mortgage lenders in the AA. Positive consideration is given to the bank's performance given there is a significant number of home mortgage lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Vermont section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans is poor.

2020-2021

There were no low-income geographies in the AA. The bank's level of home mortgage loans in moderate-income geographies in 2020-2021 is well below the demographic data and below the aggregate performance.

2022

The bank did not have sufficient volume of loans in 2022 to perform an analysis.

Lending Gap Analysis

The OCC reviewed activity reports and lending maps to analyze home mortgage lending activities to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels. The OCC considered the high median housing value compared to income that constrains affordability of homeownership for LMI residents, and the positive contribution of flexible and innovative loan products offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans is excellent.

2020-2021

The bank's level of home mortgage loans to low-income borrowers in 2020-2021 is well below the demographic data and exceeds aggregate performance. The bank's level of home mortgage loans to moderate-income borrowers in 2020-2021 is near to the demographic data and exceeds aggregate performance.

2022

The bank did not have sufficient volume of loans in 2022 to complete an analysis.

Low-income families make \$38,595 (50 percent of 2022 FFIEC adjusted median family income in the AA) or less. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income. This calculates to a maximum monthly mortgage payment of \$965 for low-income borrowers and \$1,543 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,270. Therefore, low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in this AA.

Community Development Lending

The bank has made few if any CD loans. The bank did not originate any CD loans during the evaluation period.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

Trustco offered several flexible affordable mortgage products during the evaluation period. The bank closed one loan totaling \$195,700 under the 95 Percent LTV Mortgage Program. Refer to the Description of the Institution for further detail.

INVESTMENT TEST

The bank’s performance under the Investment Test in Vermont is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the VT Non-MSA is adequate.

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments					
Assessment Area	Prior Period*	Current Period	Total		Unfunded Commitments**
	\$(000’s)	\$(000’s)	\$(000’s)	% of Total \$	\$(000’s)
Vermont Non-MSA	36.8	8.5	45.3	100	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments and donations that benefit the Vermont Non-MSA total \$45,000 for the evaluation period and represent 3.2 percent of allocated capital. During the evaluation period, Trustco made one donation totaling \$8,500 that benefitted the AA. The donation supported a community loan fund that provides loans for affordable housing and economic development purposes.

There were two prior period investments outstanding during the current evaluation period and benefited the Vermont Non-MSA. The prior period MBS investment had an outstanding balance of \$36,800 at the end of the evaluation period. The MBS supported affordable housing for LMI families in the AA.

SERVICE TEST

The bank’s performance under the Service Test in Vermont is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Vermont Non-MSA is adequate.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits		Branches					Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Vermont Non-MSA	100	1	100	0	0	100	0	0	6	72.4	21.6

The bank has one branch in the AA, which is located in a middle-income geography in the AA. The bank does not have any branches in the low-income or moderate-income geographies. However, there are no low-income geographies and only one moderate-income geography AA.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as online account opening, Zelle – a person to person payment program, deposit-taking ATMs, direct deposit, telephone banking, and mobile banking. These services had a neutral impact on conclusions.

The bank did not open or close any branches in the AA during the evaluation period.

Services, including business hours, at the bank’s only branch in the AA do not vary in a way that inconveniences its AA, particularly moderate-income geographies and/or LMI individuals.

Lobby and drive-up hours are comparable to branches in other AAs. The branch offers similar lobby and drive-up service hours each weekday and service hours on Saturday morning. Trustco offers free checking accounts at the branch, which benefit individuals including LMI customers.

Community Development Services

The bank did not provide any CD services in the AA. This had a neutral impact on the conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/20 to 12/31/22	
Bank Products Reviewed:	Home mortgage, small business CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
New York CSA	Full scope	NJ: Bergen County NY: Dutchess, Orange, Putnam, Rockland, Ulster, and Westchester Counties
Florida		
Miami CSA	Limited scope	Indian River, Martin, and Palm Beach Counties
North Port CSA	Full scope	Charlotte, Manatee, and Sarasota Counties
Orlando CSA	Full scope	Flagler, Lake, Orange, Osceola, Polk, Seminole, and Volusia Counties
Palm Bay MSA	Limited scope	Brevard County
Tampa MSA	Limited scope	Hillsborough County
Massachusetts		
Pittsfield MSA	Full scope	Berkshire County
New York		
Albany CSA	Full scope	Albany, Rensselaer, Saratoga, Schenectady, Schoharie, Warren, and Washington Counties
New York Non-MSA	Limited scope	Columbia, Greene, and Montgomery Counties
Vermont		
Vermont Non-MSA	Full scope	Bennington County

Appendix B: Summary of MMSA and State Ratings

RATINGS (BANK NAME)				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
New York CSA	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Florida	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Massachusetts	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
New York	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Vermont	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

()The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.*

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to

determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) 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.

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.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

New York CSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
NY CSA	1,238	342,116	100.0	128,394	0.9	0.7	1.7	5.3	3.0	5.2	25.4	20.9	23.3	68.5	75.4	69.8	0.0	0.0	0.0	
Total	1,238	342,116	100.0	128,394	0.9	0.7	1.7	5.3	3.0	5.2	25.4	20.9	23.3	68.5	75.4	69.8	0.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
NY CSA	511	119,844	100.0	72,961	1.1	0.6	2.3	6.1	3.1	6.7	28.4	28.0	28.5	64.0	68.1	62.1	0.4	0.2	0.3	
Total	511	119,844	100.0	72,961	1.1	0.6	2.3	6.1	3.1	6.7	28.4	28.0	28.5	64.0	68.1	62.1	0.4	0.2	0.3	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
NY CSA	1,238	342,116	100.0	128,394	16.7	1.1	1.8	12.9	7.2	8.6	16.1	19.8	18.6	54.4	70.7	60.4	0.0	1.2	10.6	
Total	1,238	342,116	100.0	128,394	16.7	1.1	1.8	12.9	7.2	8.6	16.1	19.8	18.6	54.4	70.7	60.4	0.0	1.2	10.6	

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
NY CSA	511	119,844	100.0	72,961	16.6	1.6	3.2	12.8	7.0	11.5	16.4	17.2	19.9	54.2	73.4	54.7	0.0	0.8	10.7	
Total	511	119,844	100.0	72,961	16.6	1.6	3.2	12.8	7.0	11.5	16.4	17.2	19.9	54.2	73.4	54.7	0.0	0.8	10.7	

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Florida

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Miami CSA	271	66,200	7.5	98,602	2.7	1.1	1.9	20.7	9.6	17.4	35.1	37.6	36.5	41.3	51.7	44.0	0.2	0.0	0.2
North Port CSA	884	200,010	22.8	74,796	0.8	0.1	0.3	16.8	7.0	12.9	54.7	59.7	48.9	27.6	33.1	37.8	0.0	0.0	0.0
Orlando CSA	2,540	530,015	60.4	225,948	1.0	0.6	0.7	19.1	9.6	15.1	46.7	36.4	47.9	33.2	53.4	36.3	0.0	0.0	0.0
Palm Bay MSA	151	34,289	3.9	40,168	1.6	0.0	1.0	21.1	11.9	20.4	43.5	47.0	42.5	33.8	41.1	36.0	0.0	0.0	0.0
Tampa MSA	276	46,664	5.3	82,570	3.3	0.4	2.8	17.8	4.7	14.4	31.8	64.5	30.0	46.9	30.4	52.7	0.2	0.0	0.1
Total	4,122	877,179	100.0	522,084	1.8	0.5	1.3	19.1	8.8	15.5	42.7	43.8	42.6	36.3	46.9	40.6	0.1	0.0	0.1

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Miami CSA	95	20,217	5.7	60,354	2.8	0.0	2.5	20.2	7.4	20.6	34.9	27.4	35.0	41.3	61.1	41.3	0.8	4.2	0.6
North Port CSA	369	84,149	23.5	47,397	1.0	0.5	0.4	17.4	13.0	14.4	50.9	51.8	47.5	30.6	30.6	37.2	0.1	4.1	0.6
Orlando CSA	999	191,472	53.5	151,817	1.4	0.5	1.2	19.9	10.5	16.5	44.0	34.6	46.5	34.3	54.2	35.4	0.4	0.2	0.5
Palm Bay MSA	65	14,766	4.1	27,026	0.8	0.0	0.9	18.4	9.2	19.4	45.6	35.4	45.6	34.6	53.8	33.5	0.5	1.5	0.6
Tampa MSA	165	47,016	13.1	51,196	2.0	1.2	2.1	22.1	21.2	20.0	33.9	26.7	34.4	41.8	50.9	43.2	0.2	0.0	0.2
Total	1,693	357,620	100.0	337,790	1.7	0.5	1.4	19.8	11.9	17.7	41.7	37.2	42.7	36.4	49.1	37.7	0.4	1.3	0.5

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Miami CSA	271	66,200	7.5	98,602	21.8	2.6	4.1	17.4	13.3	13.8	17.9	18.5	18.6	42.9	64.9	47.7	0.0	0.7	15.7
North Port CSA	884	200,010	22.8	74,796	19.0	4.5	4.8	19.4	18.7	14.9	21.2	24.7	20.3	40.5	51.5	45.4	0.0	0.7	14.6
Orlando CSA	2,540	530,015	60.4	225,948	21.1	3.7	3.8	18.3	13.4	13.9	19.8	22.7	20.8	40.8	58.9	41.1	0.0	1.3	20.4
Palm Bay MSA	151	34,289	3.9	40,168	20.2	3.3	6.7	18.6	12.6	17.1	20.6	27.2	20.0	40.6	57.0	35.9	0.0	0.0	20.3
Tampa MSA	276	46,664	5.3	82,570	21.9	8.7	3.3	16.8	21.7	13.5	17.7	25.0	19.4	43.6	43.8	43.4	0.0	0.7	20.4
Total	4,122	877,178	100.0	522,084	21	4.1	4.2	18	15.1	14.2	19.3	23.2	20.1	41.7	56.6	42.9	0.0	1.0	18.7

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Miami CSA	95	20,217	5.6	60,354	21.3	2.1	4.8	17.3	7.4	13.6	18.8	25.3	18.7	42.7	65.3	48.3	0.0	0.0	14.6
North Port CSA	369	84,149	23.5	47,397	18.4	7.3	5.5	19.8	17.9	15.1	20.9	23.6	21.0	41.0	50.1	44.8	0.0	1.1	13.6
Orlando CSA	999	191,472	53.5	151,817	20.6	2.5	3.8	18.4	11.8	13.2	19.8	22.3	22.5	41.1	62.0	42.8	0.0	1.4	17.6
Palm Bay MSA	65	14,766	4.1	27,026	20.0	0.0	6.5	18.5	18.5	16.0	20.2	13.8	22.1	41.3	67.7	38.4	0.0	0.0	17.0
Tampa MSA	165	47,016	13.1	51,196	21.2	1.8	3.8	16.9	9.1	13.4	18.7	15.2	21.7	43.2	73.3	45.2	0.0	0.6	15.8
Total	1,693	357,620	100.0	337,790	20.5	3.4	4.5	18.1	12.9	13.8	19.6	21.7	21.4	41.8	60.9	44.1	0.0	1.1	16.2

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Massachusetts

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Pittsfield MSA	103	20,574	100.0	4,922	3.1	0.0	3.8	10.2	4.9	7.9	55.5	59.2	52.5	31.2	35.9	35.8	0.0	0.0	0.0	
Total	103	20,574	100.0	4,922	3.1	0.0	3.8	10.2	4.9	7.9	55.5	59.2	52.5	31.2	35.9	35.8	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Pittsfield MSA	18	2,597	100.0	3,820	0.3	0.0	1.0	15.4	16.7	17.5	56.5	66.7	55.4	27.8	16.7	26.1	0.0	0.0	0.0	
Total	18	2,597	100.0	3,820	0.3	0.0	1.0	15.4	16.7	17.5	56.5	66.7	55.4	27.8	16.7	26.1	0.0	0.0	0.0	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Pittsfield MSA	103	20,574	100.0	4,922	21.3	8.7	9.0	17.6	15.5	18.6	20.5	26.2	19.6	40.6	44.7	39.4	0.0	4.9	13.5	
Total	103	20,574	100.0	4,922	21.3	8.7	9.0	17.6	15.5	18.6	20.5	26.2	19.6	40.6	44.7	39.4	0.0	4.9	13.5	

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Pittsfield MSA	18	2,597	100.0	3,820	19.7	5.6	7.9	17.8	16.7	21.1	22.1	16.7	22.9	40.4	50.0	38.8	0.0	11.1	9.3	
Total	18	2,597	100.0	3,820	19.7	5.6	7.9	17.8	16.7	21.1	22.1	16.7	22.9	40.4	50.0	38.8	0.0	11.1	9.3	

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of New York

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Albany CSA	5,522	1,053,714	98.1	43,725	2.3	1.5	2.4	12.6	8.0	12.5	57.6	54.0	56.3	27.5	36.5	28.8	0.0	0.0	0.0	
NY Non-MSA	112	20,452	1.9	2,147	0.0	0.0	0.0	6.8	17.0	6.5	61.9	52.7	65.5	31.3	30.4	28.0	0.0	0.0	0.0	
Total	5,634	1,074,166	100.0	45,872	2.2	1.5	2.3	12.3	8.1	12.2	57.8	54.0	56.7	27.7	36.4	28.7	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Albany CSA	1,730	324,587	98.4	31,687	2.8	3.6	3.7	13.2	9.9	13.9	51.6	47.1	49.7	32.2	39.0	32.3	0.3	0.3	0.4
NY Non-MSA	40	5,178	1.6	1,666	3.5	15.0	3.8	4.7	2.5	3.4	66.8	55.0	69.5	25.1	27.5	23.3	0.0	0.0	0.0
Total	1,770	329,766	100.0	33,353	2.8	3.9	3.7	12.8	9.8	13.3	52.2	47.3	50.6	31.9	38.8	31.9	0.3	0.3	0.4

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Albany CSA	5,522	1,053,714	98.1	43,725	20.0	7.9	8.1	17.5	19.7	21.6	22.2	25.4	24.1	40.3	45.4	34.7	0.0	1.6	11.5
NY Non-MSA	112	20,452	1.9	2,147	19.2	1.8	2.0	16.0	8.0	11.4	20.6	30.4	19.0	44.2	57.1	56.7	0.0	2.7	11.0
Total	5,634	1,074,166	100.0	45,872	20.0	7.8	7.8	17.4	19.5	21.1	22.1	25.5	23.9	40.4	45.7	35.8	0.0	1.6	11.5

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Albany CSA	1,730	324,587	98.4	31,687	20.9	9.7	9.9	17.4	19.0	23.1	21.3	26.7	24.9	40.3	41.6	31.8	0.0	3.1	10.3
NY Non-MSA	40	5,178	1.6	1,666	21.2	5.0	3.3	13.4	12.5	10.4	20.0	37.5	21.5	45.4	45.0	55.7	0.0	0.0	9.0
Total	1,770	329,766	100.0	33,353	20.9	9.6	9.6	17.3	18.8	22.4	21.3	26.9	24.7	40.5	41.6	33.0	0.0	3.0	10.2

Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Albany CSA	861	96,909	100.0	24,954	11.0	6.5	8.6	12.8	10.8	12.1	49.1	54.9	50.5	26.8	26.2	28.5	0.3	1.5	0.2
Total	861	96,909	100.0	24,954	11.0	6.5	8.6	12.8	10.8	12.1	49.1	54.9	50.5	26.8	26.2	28.5	0.3	1.5	0.2

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Albany CSA	101	31,475	100.0	6.0	6.9	12.5	11.9	46.6	62.4	27.5	17.8	7.4	1.0	
Total	101	31,475	100.0	6.0	6.9	12.5	11.9	46.6	62.4	27.5	17.8	7.4	1.0	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Albany CSA	861	96,909	100.0	24,954	85.8	7.4	41.2	4.0	14.6	10.2	77.9		
Total	861	96,909	100.0	24,954	85.8	7.4	41.2	4.0	14.6	10.2	77.9		

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Albany CSA	101	31,475	100.0	--	86.1	35.6	--	3.8	64.4	10.1	0.0	
Total	101	31,475	100.0	--	86.1	35.6	--	3.8	64.4	10.1	0.0	
<i>Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

State of Vermont

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
VT Non-MSA	42	6,572	100.0	1,133	0.0	0.0	0.0	7.9	4.8	6.6	92.1	95.2	93.4	0.0	0.0	0.0	0.0	0.0	0.0	
Total	42	6,572	100.0	1,133	0.0	0.0	0.0	7.9	4.8	6.6	92.1	95.2	93.4	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
VT Non-MSA	18	1,595	100.0	755	0.0	0.0	0.0	4.2	27.8	2.9	71.9	55.6	72.6	23.9	16.7	24.5	0.0	0.0	0.0	
Total	18	1,595	100.0	755	0.0	0.0	0.0	4.2	27.8	2.9	71.9	55.6	72.6	23.9	16.7	24.5	0.0	0.0	0.0	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
VT Non-MSA	42	6,572	100.0	1,133	23.9	7.1	6.3	18.1	16.7	15.4	22.7	19.0	17.3	35.3	52.4	49.7	0.0	4.8	11.4
Total	42	6,572	100.0	1,133	23.9	7.1	6.3	18.1	16.7	15.4	22.7	19.0	17.3	35.3	52.4	49.7	0.0	4.8	11.4

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
VT Non-MSA	18	1,595	100.0	755	18.8	16.7	8.2	18.4	22.2	14.3	21.9	27.8	18.9	40.9	22.2	48.3	0.0	11.1	10.2
Total	18	1,595	100.0	755	18.8	16.7	8.2	18.4	22.2	14.3	21.9	27.8	18.9	40.9	22.2	48.3	0.0	11.1	10.2

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*