



PUBLIC DISCLOSURE

December 5, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Evans Bank, National Association
Charter Number: 11583

6460 Main Street
Williamsville, New York 14221

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite A132
East Syracuse, New York 13057

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 Evans Bank, National Association (EBNA or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	EBNA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			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 based on the High Satisfactory rating in the state of New York.
- The Investment Test rating is based on the High Satisfactory rating in the state of New York.
- The Service Test rating is based on the Low Satisfactory rating in the state of New York.

Innovative and Flexible Lending Programs

EBNA offered innovative and flexible lending products for residential and commercial borrowers through federal government sponsored programs and other internal loan programs throughout all its assessment areas (AA). The bank offered affordable lending products for low- and moderate-income borrowers through the Federal Housing Administration (FHA) and Small Business Administration (SBA) and offered Veterans Affairs (VA) loans. In addition, the bank offered loans through the Federal Home Loan Bank's (FHLB) First Home Club (FHC) and HomeBuyer Dream programs. Internal programs included its CRA Mortgage Loan Products and Work/Life Solutions loan program.

The bank offers two CRA Mortgage Loan Products geared towards low- and moderate-individuals and geographies. The products may be used for home purchases, rate-term refinances, and home rehabilitation financing and include flexible underwriting standards as well as fee waivers and closing cost assistance. In June 2021, the bank introduced a no-cash out refinance initiative for low-income borrowers with existing loans. During the evaluation period, EBNA originated 292 CRA Mortgage Loan Products, or \$37.5 million that received lender credits and fee waivers of \$731,150 both inside and outside of its AAs.

The bank offers assistance to low- and moderate-income borrowers through participation in the FHLB's FHC and HomeBuyer Dream programs.

- The FHC program assists first time buyers with incomes at or below 80 percent of area median income by matching funds based on the household's systematic savings within a dedicated savings account. The maximum assistance under the program is \$8,000, which includes a grant of up to \$7,500 to be used toward the down payment and/or closing costs for the purchase of a home and up to \$500 to defray homeownership counseling costs. Effective April 1, 2019, the program discontinued new household enrollments; however, 38 EBNA customers were grandfathered in the program, 14 of which were opened during the evaluation period.
- The HomeBuyer Dream Program replaced the FHC. The program provides funds in the form of a grant to be used towards down payment and closing cost assistance to first-time homebuyers earning at or below 80 percent of the area median income. The maximum assistance under the program is \$15,000, which includes a grant of up to \$14,500 to be used towards down payment and closing costs and up to \$500 to defray homeownership counseling costs. During the evaluation period, EBNA originated 96 loans under the HomeBuyer Dream Program across all AAs.

The bank began offering FHA and VA loans with the acquisition of Fairport Savings Bank (FSB) in May 2020. During the evaluation period, EBNA originated 14 FHA loans, or \$2.7 million, and nine VA loans, or \$1.9 million, across all AAs.

The Work/Life Solutions loan program is a partnership with the United Way that provides employees of several local organizations with a connection to various services such as a resource center and financial literacy education. In addition, the program offers small dollar loan amounts not to exceed \$1,000 to help avoid higher-cost borrowing alternatives. During the evaluation period, EBNA originated 346 small dollar loans, or \$343,000 to low- and moderate-income individuals across all AAs.

The bank works with the SBA to provide affordable loans to small business through the SBA 504 and 7(a) loan programs, which provide loan guarantees up to \$5 million to qualifying businesses under the SBA small business definition. During the evaluation period, the bank originated 72 SBA 504 and 7(a) loans, or \$17.7 million, across all AAs.

EBNA worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic.

- EBNA participated as a lender in the SBA Paycheck Protection Program (PPP). The PPP was implemented to encourage businesses to keep employees on payrolls during the initial lockdowns of the COVID-19 pandemic. Loans originated under the program carried an interest rate of 1 percent and had a maturity of two years if originated prior to June 5, 2020, and five years if originated after that date. The SBA forgave the loans if a business met certain requirements such as spending at least 60 percent of proceeds on payroll costs and maintaining employee and compensation levels. There were two rounds of the PPP, with the second round having stricter eligibility to target small businesses most affected by the COVID-19 pandemic's economic impact. EBNA participated in both rounds of the PPP. During the evaluation period, EBNA originated \$95 million in qualifying PPP loans across all AAs.

- EBNA also provided support to its customer base through its COVID-19 related deferral program, which included a 90-day principal and interest deferral. During the evaluation period, the bank granted 132 home mortgage deferrals with outstanding loan balances of \$16 million, and 426 commercial loan deferrals with outstanding loan balances of \$372 million across all AAs.

Lending in Assessment Area

A substantial majority of the bank's loans are in its AAs.

EBNA originated and purchased 96 percent by number and 94 percent by dollar of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. EBNA did not submit affiliate lending data for consideration during this evaluation.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,365	94.5	80	5.5	1,445	430,199	94.0	27,412	6.0	457,611
Small Business	3,907	96.5	140	3.5	4,047	429,590	94.0	27,371	6.0	456,961
Small Farm	1	100.0	0	0.0	1	5	100.0	0	0.0	5
Total	5,273	96.0	220	4.0	5,493	859,794	94.0	54,783	6.0	914,577

*Source: Evaluation Period: 1/1/2019 – 12/31/2021 Bank Data
Due to rounding, totals may not equal 100.0%.*

Description of Institution

EBNA is an intrastate community bank headquartered in Angola, N.Y. EBNA executive offices are located in Williamsville, N.Y., a suburb of Buffalo, N.Y. EBNA is a wholly-owned subsidiary of Evans Bancorp, Inc., a one bank holding company also headquartered in Angola, N.Y. Evans Bancorp, Inc. has a second subsidiary, Evans National Financial Services, LLC, which owns The Evans Agency, LLC, a property and casualty insurance agency offering personal, commercial, and financial services products. The Evans Agency, LLC owns Frontier Claims Services, Inc., which provides claims adjusting services to various insurance companies. EBNA had total assets of \$2.2 billion as of December 31, 2021.

EBNA has one operating subsidiary, Evans National Holding Corp. (ENHC), and two statutory subsidiaries, Evans Capital Trust I and ENB Employers Insurance Trust. ENHC is a real estate investment trust that holds commercial real estate loans and residential mortgages. Evans Capital Trust I is a statutory trust formed for the purpose of issuing and selling certain securities representing undivided beneficial interests in the assets of the trust and investing the proceeds in certain debentures of Evans Bancorp Inc. ENB Employers Insurance Trust is a trust company formed to hold life insurance policies under the bank's bank-owned life insurance program. This performance evaluation does not include or consider any activities performed or conducted by bank affiliates or subsidiaries. EBNA's operating subsidiary had no impact on the bank's capacity to lend in the AAs where it operates.

EBNA and its subsidiaries offer traditional banking and services, as well as insurance products and services. Lending activities are focused on commercial real estate lending, commercial lending and home mortgage lending. As of December 31, 2021, EBNA's assets totaled \$2.2 billion with \$1.6 billion in total loans, \$1.9 billion in total deposits and \$200 million in tier 1 equity capital. Total loans consist of \$474 million or 30 percent commercial real estate loans, \$429 million or 27 percent home mortgage loans, \$234 million or 15 percent multi-family loans, \$210 million or 13 percent commercial and industrial loans, \$141 million or 9 percent construction and land development, \$76 million or 5 percent home equity lines of credit, and \$7 million or less than 1 percent in other loan types.

EBNA has three designated AAs, the Buffalo-Cheektowaga NY MSA AA, the Rochester NY MSA AA, and the NY Non MSA AA. The Buffalo-Cheektowaga NY MSA AA includes the entire Buffalo-Cheektowaga, N.Y. metropolitan statistical area (MSA #15380), which consists of Erie and Niagara counties. The Rochester NY MSA AA was added to the bank's AAs in May 2020, with the acquisition of FSB. EBNA acquired \$322 million in total assets, \$238 million in total deposits, and five branches in Monroe County as part of the FSB transaction. The Rochester NY MSA AA is comprised of three of the six counties in the Rochester, N.Y. MSA (MSA #40380)—Monroe, Ontario, and Wayne counties. The NY Non MSA AA consists of two census tracts in Cattaraugus County and four census tracts in Chautauqua County, which are contiguous to the Buffalo-Cheektowaga NY MSA AA. The AAs do not arbitrarily exclude any low- or moderate-income geographies.

EBNA operates in a competitive financial services market. Competitors include credit card companies, on-line mortgage lenders, large banks, credit unions, community banks and thrifts. EBNA does not have any legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs during the evaluation period.

EBNA's prior performance evaluation dated October 28, 2019, was performed using Intermediate Small Bank examination procedures, and resulted in an Outstanding rating based on an Outstanding rating for the Lending Test and Community Development Test.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's performance was assessed using home mortgage, small business, and small farm loans originated and purchased during the evaluation period, which was January 1, 2019, through December 31, 2021. Performance also included an assessment of community development (CD) activities over the same period, including CD loans and services, qualified investments, grants, and donations.

Lending performance was assessed based on the bank's primary loan products. Primary loan products, for purposes of this review, were products in which the bank originated at least 20 loans within an AA during the evaluation period. EBNA had a sufficient volume of home mortgage and small business loans to conduct a meaningful analysis. Small farm loans did not have a sufficient volume and were not evaluated. Home Mortgage Disclosure Act (HMDA) and small business and small farm aggregate lending as well as market share percentages consider only lenders that submit HMDA and small business and small farm data. Lenders that collect but do not submit data are not considered in the percentages.

Management provided home mortgage information for 2019, 2020, and 2021 as required by HMDA. Management provided small business and small farm information for 2019, 2020, and 2021 as required

by the Community Reinvestment Act (CRA). Management did not collect or submit any consumer loan data for consideration. Examiners determined the data submitted as required by HMDA and CRA was reliable and accurate. In addition, examiners verified the CD activity data submitted by management.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs 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 based on its performance in the state of New York.

The Buffalo-Cheektowaga NY MSA AA received the most weight in the performance assessment as it represented 91.2 percent of total loans (by number of home mortgages, small business, and small farm loans), 83.2 percent of deposits, 71.4 percent of branches, 54.8 percent of AA census tracts, 53.9 percent of the AA population, and 53.9 percent of businesses. The Rochester NY MSA AA carried the next most weight as it represented 8.1 percent of total loans, 11.1 percent of total deposits, 23.8 percent of branches, 41.1 percent of census tracts, 45.2 percent of the AA population, and 45.5 percent of businesses, while also considering the period it was included as an AA. The NY Non MSA AA received the least weight considering its limited lending activity, deposits market share, and physical presence.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) in determining a national bank's 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 AA 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 bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank'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.

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: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans in the AA is adequate.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses of different sizes is good.
- The level of community development loans contributed positively to the bank's performance.
- The use of innovative and flexible loan products contributed positively to the bank's performance.
- The bank has a significant level of qualified investments, donations, and grants.
- The bank's delivery systems are unreasonably inaccessible to geographies and individuals of different income levels in the AA, but the bank's opening of a branch has improved the accessibility of its delivery systems, particularly in low-income geographies and/or to low- and moderate-income individuals.
- Services and business hours vary in a way that inconveniences portions of low- and moderate-income individuals or geographies in the bank's AA.
- The bank provides a high level of CD services.

Description of Institution's Operations in New York

EBNA has three AAs within the state of New York consisting of the Buffalo-Cheektowaga NY MSA AA, the Rochester NY MSA AA, and the NY Non MSA AA. The Buffalo-Cheektowaga MSA AA includes the entire Buffalo-Cheektowaga N.Y. MSA (MSA #15380), which consists of 299 census tracts located in Erie (237 census tracts) and Niagara (62 census tracts) counties. The Buffalo-Cheektowaga NY MSA AA includes 15 of the bank's 21 branches. The AA includes the cities of Buffalo and Niagara Falls and the surrounding suburbs.

The Rochester NY MSA AA is comprised of a portion of the Rochester NY MSA (MSA #40380) and includes Monroe, Ontario, and Wayne Counties. The Rochester NY MSA AA consists of 241 census tracts located in Monroe (193 census tracts), Ontario (25 census tracts) and Wayne (23 census tracts) counties. The five branches acquired through the FSB acquisition are located within middle- and upper-income census tracts of Monroe County. The portion of MSA #40380 that is not included within the

bank's Rochester NY MSA AA contains no low-income census tracts and three moderate-income census tracts. The bank does not have a physical presence in those three counties.

The NY Non MSA AA includes portions of Chautauqua (four census tracts) and Cattaraugus (two census tracts) counties. The four census tracts in Chautauqua County represent the following Legislative Districts in their entirety: Arkwright, Charlotte, Cherry Creek, Hanover, Sheridan, and Villenova. The two census tracts in Cattaraugus County represent a portion of Cattaraugus Territory of the Seneca Nation of Indians, the Town of Perrysburg and portions of the Towns of Dayton and Persia. The census tract boundaries do not overlap with the town boundaries reflecting the rural nature of Cattaraugus County which makes it difficult to take full political subdivisions. Management adjusted the eastern boundary of its NY Non MSA AA to include only the portion of the political subdivision that it could reasonably expect to serve as permitted under the regulation. The NY Non MSA AA is contiguous to the bank's Buffalo-Cheektowaga NY MSA AA. EBNA has one branch located in a middle-income census tract of Chautauqua County.

Buffalo-Cheektowaga NY MSA AA

ENBA operated 15 branches in the Buffalo-Cheektowaga NY MSA AA during the evaluation period. Fourteen branches were in Erie County and one branch was in Niagara County. The bank also operated 27 automated teller machines (ATM), 18 of which are deposit-taking ATMs. One branch was opened in a low-income census tract in Erie County during the evaluation period. The bank did not close any branches in the AA during the evaluation period. The 15 branches accounted for 71.4 percent of the bank-wide branch network.

The bank faced strong competition for deposits in the Buffalo-Cheektowaga NY MSA AA. As of June 30, 2021, EBNA reported \$1.9 billion in deposits in the AA, which represented 83.2 percent of total deposits. EBNA ranked seventh out of 81 depository institutions, with a deposit market share of 2.1 percent. The bank's top competitors for deposit market share include M&T Bank with 60.3 percent, KeyBank, N.A. with 13.7 percent, HSBC Bank USA, N.A., with 5.1 percent, and Bank of America, N.A. with 4.5 percent.

EBNA originated and purchased 79.8 percent of its total home mortgage loans and 95.2 percent of its total small business loans in the Buffalo-Cheektowaga NY MSA AA during the evaluation period.

Economic Data

According to the May 2022 Moody's Analytics report, the Buffalo-Cheektowaga, N.Y. MSA was in the recovery phase of the business cycle but was the worst-performing large metropolitan area in New York. With the MSA's economy heavily reliant on the education and health services sectors, the COVID-19 pandemic disproportionately affected the MSA's economy. In addition, the retail sector has experienced a slow recovery in part from a slow uptake in cross-border shopping from Canadians. However, the MSA does benefit from a strong financial and insurance sector.

According to the U.S. Bureau of Labor Statistics (BLS) December 2021 data, the unemployment rate (not seasonally adjusted) in the Buffalo-Cheektowaga, N.Y. MSA was 3.5 percent, which outperformed the state unemployment rate of 4.5 percent. During the evaluation period, unemployment ranged from a low of 3.5 percent in December 2021 to a high of 21.6 percent in April 2020 during the COVID-19 pandemic. Prior to the COVID-19 pandemic, the unemployment rate in the Buffalo-Cheektowaga, N.Y. MSA did not differ materially from the state's unemployment rate, but during the recovery following the

pandemic, the MSA recovered more quickly and outperformed the state's unemployment rate. Per Moody's Analytics, the key sectors of the economy include education and health services, government, professional and business services, and retail trade. Top employers in the Buffalo-Cheektowaga, N.Y. MSA were Kaleida Health, M&T Bank, Catholic Health, University at Buffalo, and Wegmans Food Markets Inc.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from an interagency listening session conducted with several community groups during the evaluation period within the Buffalo-Cheektowaga NY MSA AA to determine local economic conditions and community needs. The listening session indicated the need for technical assistance for small businesses, rehabilitation of some housing stock, financing opportunities for community development projects, financial literacy, and job training.

In addition, the OCC reviewed information from a coalition session held to raise awareness through advocating for banking reforms, community reinvestment, and access to fair and affordable housing for the Buffalo-Niagara area. The coalition indicated a need for affordable housing financing, investment in low- and moderate-income geographies, and more bank branches in certain areas of Buffalo, N.Y.

Buffalo-Cheektowaga NY MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Buffalo-Cheektowaga NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	299	15.4	18.1	39.8	23.4	3.3
Population by Geography	1,135,734	12.7	13.5	40.0	32.5	1.3
Housing Units by Geography	519,952	14.3	15.0	40.6	29.9	0.2
Owner-Occupied Units by Geography	311,183	6.9	11.4	43.8	37.9	0.0
Occupied Rental Units by Geography	159,470	23.9	19.7	37.1	18.9	0.4
Vacant Units by Geography	49,299	29.7	22.7	32.0	15.1	0.5
Businesses by Geography	91,398	10.5	12.2	35.6	37.7	4.0
Farms by Geography	2,345	3.8	4.9	45.9	44.1	1.3
Family Distribution by Income Level	284,789	22.2	16.6	20.3	40.9	0.0
Household Distribution by Income Level	470,653	25.9	15.3	16.5	42.3	0.0
Median Family Income MSA – 15380 Buffalo-Cheektowaga, N.Y. MSA		\$67,108	Median Housing Value			\$125,586
			Median Gross Rent			\$726
			Families Below Poverty Level			10.7%

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.

Scope of Evaluation in New York State

The OCC conducted a full-scope review of the Buffalo-Cheektowaga NY MSA AA and limited-scope reviews of the NY Non MSA AA and the Rochester NY MSA AA. The full-scope AA accounted for 91.2 percent of loans, 83.2 percent of deposits, and 71.4 percent of branches in the state of New York. Small business loans, which accounted for 77.1 percent of loans originated or purchased in the state's AAs during the evaluation period, were given more weight than home mortgage loans. EBNA did not originate enough small farm loans during the evaluation period in any of the state's AAs to provide a meaningful analysis.

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.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Buffalo-Cheektowaga NY MSA AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Buffalo-Cheektowaga NY MSA AA	1,089	3,720	1	14	4,824	91.2	83.2
NY Non MSA AA	8	30	0	1	39	0.7	5.7
Rochester NY MSA AA	268	157	0	2	427	8.1	11.1

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

Dollar Volume (\$000s) of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Buffalo-Cheektowaga NY MSA AA	365,493	406,343	5	65,948	837,789	89.5	83.2
NY Non MSA AA	708	3,004	0	8,000	11,712	1.3	5.7
Rochester NY MSA AA	63,998	20,243	0	2,300	86,541	9.2	11.1

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

Buffalo-Cheektowaga NY MSA AA

Lending levels reflect excellent responsiveness to Buffalo-Cheektowaga NY MSA AA credit needs.

Per the deposit market share report as of June 30, 2021, the bank ranked seventh out of 81 depository institutions, or the 91st percentile, with a 2.1 percent deposit market share. EBNA reported \$1.6 billion in deposits in the AA.

Based on the 2021 HMDA market share data, the bank ranked 17th out of 291 lending institutions, or in the 94th percentile, with a 1.2 percent market share, demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders in the market, M&T Bank, Rocket Mortgage, KeyBank, N.A., Citizens Bank, N.A., and Premium Mortgage Corporation had a combined market share of 44.5 percent. Market share for the top five lenders ranged from 5.3 percent to 12.6 percent.

Based on the 2020 CRA small business loan data, the bank ranked fourth out of 137 lending institutions, or in the 97th percentile, with an 11.3 percent market share, demonstrating excellent responsiveness to credit needs. The top three lenders in the market, M&T Bank, KeyBank, N.A., and Citizens Bank, N.A., had a combined market share of 46.4 percent. Market share for the top three lenders ranged from 12.1 percent to 20.4 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in the Buffalo-Cheektowaga NY MSA 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.

The geographic distribution of home mortgage loans is good. The geographic distribution of home mortgage loans in low-income census tracts was below the percentage of owner-occupied housing and exceeded aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts was near to the percentage of owner-occupied housing and exceeded aggregate lending in the AA.

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.

The geographic distribution of small loans to businesses is adequate. The geographic distribution of small loans to businesses in low-income census tracts was below the percentage of businesses located in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to business in moderate-income census tracts was below the percentage of businesses located in moderate-income census tracts and near to aggregate lending in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of EBNA's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines 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 loans originations and purchases.

The borrower distribution of home mortgage loans to individuals of different income levels is excellent. Home mortgage lending to low-income borrowers was below the number of low-income families and exceeded aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers exceeded the number of moderate-income families and aggregate lending to moderate-income families in the 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 originations and purchases to small loans to businesses.

The distribution of small loans to businesses of different sizes is good. The distribution of small loans to businesses with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue and significantly exceeded aggregate lending in the AA.

Community Development Lending

The institution has made a relatively high level of CD loans.

Number and Amount of Community Development Loans

Community Development Loans				
<i>Assessment Area</i>	#	%	\$ (000's)	%
Buffalo-Cheektowaga NY MSA AA	14	82.4	65,948	86.5
NY Non MSA AA	1	5.9	8,000	10.5
Rochester NY MSA AA	2	11.8	2,300	3.0

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.

During the evaluation period, EBNA originated 14 loans totaling \$65.9 million, or 39.6 percent of tier 1 capital in the Buffalo-Cheektowaga NY MSA AA. CD lending includes four loans totaling \$31.0 million for affordable housing for low- or moderate-income individuals, five loans totaling \$17.7 million to organizations providing community services targeted to low- or moderate-income individuals, four loans totaling \$9.7 million to revitalize or stabilize low- or moderate-income geographies and one loan totaling \$7.5 million for economic development. Two of the 14 community development loans originated in the Buffalo-Cheektowaga NY MSA AA were SBA PPP loans, totaling \$3.1 million.

Product Innovation and Flexibility

EBNA makes extensive use of innovative or flexible lending practices to serve the credit needs of the AA. The bank's innovative or flexible products include CRA Mortgage Loan Products, Federal Home Loan Bank's FHC and HomeBuyer Dream Programs, FHA and VA loans, Work/Life Solutions loan program, and SBA loans. Refer to the Innovative and Flexible Lending Program section at the beginning of this evaluation for detail regarding EBNA's use of these products.

The Adams Street project is a partnership between EBNA and other banking partners and the city of Buffalo. The city of Buffalo donated 24 vacant lots to be utilized to build ten single family homes on Adams Street in East Buffalo located in the Buffalo-Cheektowaga NY MSA AA. EBNA is providing the financing for the construction of the homes.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Rochester NY MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Based on a limited-scope review, the bank's performance under the Lending Test in the NY Non MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance in the NY Non MSA AA did not materially impact the bank's overall performance under the Lending Test.

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 High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Buffalo-Cheektowaga MSA AA is good.

The bank has a significant level of qualified CD investments and grants, occasionally 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 occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments, Donations, and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Buffalo-Cheektowaga MSA AA	3	\$760	190	\$6,830	193	82.1	\$7,590	64.0	2	\$682
NY Non MSA AA	0	\$0	5	\$1,003	5	2.1	\$1,003	8.5	0	\$0
Rochester NY MSA AA	0	\$0	37	\$3,266	37	15.7	\$3,266	27.5	0	\$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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investments, donations, grants, and CRA subsidies, including prior period investments that remain outstanding as of the examination date.

During the evaluation period, the bank made a total of \$7.6 million in qualified investments, donations, and grants, or 4.6 percent of tier 1 capital, in the Buffalo-Cheektowaga NY MSA AA. Qualified investments include: three historic tax credits totaling \$4.2 million to preserve and revitalize structures in moderate-income census tracts into apartments, including housing for homeless women and women with children; a \$1 million investment in a community impact bond fund used for promoting community development including affordable housing, affordable healthcare, minority advancement, and neighborhood revitalization; a \$400,000 investment in a small business investment corporation; and a \$168,345 investment to assist in startups, particularly those owned by women and minorities, that also benefits the NY Non MSA AA. Qualified donations and grants totaled \$1.1 million to organizations providing community services targeting low- and moderate-income individuals and/or providing affordable housing, including \$274,150 in lender credits and application fee waivers provided to borrowers with low- and moderate-income levels or where the subject property was in a low- or moderate-income geography.

As of December 31, 2021, the outstanding balance of three prior period investments in the Buffalo-Cheektowaga NY MSA AA totaled \$759,683, which included remaining balances on CRA qualified mortgage-backed securities and a community impact bond investment fund.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Non-MSA AA and Rochester NY MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service 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 Buffalo-Cheektowaga NY MSA AA is adequate.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	Branches						Population			
		# 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	
<i>Full-Scope AA</i>											
Buffalo-Cheektowaga NY MSA AA*	83.2	15	71.4	6.7	0.0	46.7	40.0	12.7	13.5	40.0	32.5
<i>Limited-Scope AAs</i>											
NY Non MSA AA	5.7	1	6.7	0.0	0.0	100.0	0.0	1.8	0.0	98.2	0.0
Rochester NY MSA AA	11.1	5	23.8	0.0	0.0	40.0	60.0	10.3	14.9	43.0	31.3

*EBNA operated one branch in the Buffalo-Cheektowaga NY MSA AA that was in a census tract without income information.

EBNA operated 15 branches in the Buffalo-Cheektowaga NY MSA AA, including one branch in a low-income census tract. The bank did not operate any branches in moderate-income census tracts. Branches located in low-income census tracts were below the percentage of the population distribution of low-income individuals and branches located in moderate-income census tracts were significantly below the percentage of the population distribution of moderate-income individuals.

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
<i>Full-Scope AA</i>						
Buffalo-Cheektowaga NY MSA AA	1	0	+1	0	0	0
<i>Limited-Scope AAs</i>						
NY Non MSA AA	0	0	0	0	0	0
Rochester NY MSA AA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening of branches has improved the accessibility of its delivery systems, particularly in low-income geographies and to low- and moderate-income individuals. EBNA opened the Westminster Commons branch, located in a low-income census tract in Buffalo, N.Y. in August 2021. The bank did not close any branches in the AA during the evaluation period.

Services, including where appropriate, business hours vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The Westminster Commons branch, located in a low-income census tract, was only open on Mondays, Wednesdays, and Fridays, from 9:00 A.M. to 1:00 P.M. and 2:00 P.M. to 5:00 P.M. and did not open on Saturdays. EBNA's branches in middle- and upper-income census tracts were open Monday through Friday primarily from 9:00 A.M. to 4:00 P.M. with extended hours on Friday. Most of those branches offered Saturday hours.

Evans offers traditional banking products including checking and savings deposit accounts, mortgage, consumer, small business, and agricultural lending, and banking services at all branch locations in the AA. Evans complemented traditional delivery methods with certain alternative delivery systems such as direct deposit, online banking, mobile banking, telephone banking, and deposit-taking ATM services for its customers. Online, mobile, telephone, and ATM banking services provide deposit and loan account information, funds transfer, and bill pay capabilities, and statement viewing services at no extra charge.

In the second quarter of 2021, the bank contracted with the International Institute of Buffalo for on-demand telephonic interpretation services to interact with existing and potential customers who needed translation services. The bank found that the Elmwood, North Buffalo, Amherst, and new Westminster Commons branches needed these services given the large immigrant communities. In 2021, the bank provided translation services to nine customers.

Community Development Services

The institution provides a relatively high level of CD services. During the evaluation period, 35 staff members provided CD service hours to 38 different CD organizations, of which 32 staff members served as board or board-level committee members for those organizations. Of the 38 different CD organizations served, five were related to affordable housing, 26 were related to community service for low- and moderate-income individuals, and seven were related to economic development. EBNA also provides bank employees with 16 hours of paid leave on an annual basis to work with community development organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the NY Non MSA AA and Rochester NY MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope area.

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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business and small farm Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
Buffalo-Cheektowaga NY MSA AA	Full-scope	Erie and Niagara counties
NY Non MSA AA	Limited-scope	Portions of Cattaraugus and Chautauqua counties
Rochester NY MSA AA	Limited-scope	Monroe, Ontario, and Wayne counties

Appendix B: Summary of State Ratings

RATINGS		Evans Bank, National Association		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
EBNA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State:				
New York	High Satisfactory	High 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2019-21

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	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
Buffalo-Cheektowaga NY MSA AA	1,089	365,493	79.8	39,359	6.9	5.2	4.0	11.4	10.0	9.4	43.8	42.1	43.8	37.9	42.5	42.8	0.0	0.2	0.1
NY Non MSA AA	8	708	0.6	485	1.0	0.0	0.2	0.0	0.0	0.0	99.0	100.0	99.8	0.0	0.0	0.0	0.0	0.0	0.0
Rochester NY MSA AA	268	63,998	19.6	39,071	3.8	1.5	3.0	11.9	8.6	10.8	48.0	35.4	46.5	36.2	54.5	39.7	0.0	0.0	0.0
Total	1,365	430,199	100.0	78,915	5.5	4.5	3.5	11.5	9.7	10.0	46.3	41.1	45.5	36.8	44.6	41.0	0.0	0.1	0.0

Source: 2015 ACS; 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 2019-21

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	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
Buffalo-Cheektowaga NY MSA AA	1,089	365,493	79.8	39,359	22.2	8.9	7.8	16.6	27.7	20.8	20.3	17.6	23.1	40.9	35.4	34.1	0.0	10.3	14.2
NY Non MSA AA	8	708	0.6	485	20.0	50.0	8.2	19.9	0.0	22.7	22.4	37.5	28.2	37.7	0.0	30.3	0.0	12.5	10.5
Rochester NY MSA AA	268	63,998	19.6	39,071	21.6	7.5	9.4	16.8	20.1	22.2	19.8	26.5	22.5	41.8	42.5	33.3	0.0	3.4	12.6
Total	1,365	430,199	100.0	78,915	21.9	8.9	8.6	16.8	26.1	21.5	20.1	19.5	22.8	41.3	36.6	33.7	0.0	8.9	13.4

Source: 2015 ACS; Bank Data, 2021 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 2019-21

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	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
Buffalo-Cheektowaga NY MSA AA	3,720	406,343	95.2	26,144	10.5	7.4	9.0	12.2	10.1	11.2	35.6	39.7	36.3	37.7	38.8	40.7	4.0	4.0	2.8
NY Non MSA AA	30	3,004	0.8	231	0.5	0.0	0.0	0.0	0.0	0.0	99.5	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Rochester NY MSA AA	157	20,243	4.0	20,582	10.4	8.9	9.0	13.2	11.5	11.3	39.9	32.5	40.3	36.3	47.1	39.3	0.2	0.0	0.1
Total	3,907	429,590	100.0	46,957	10.4	7.4	9.0	12.6	10.1	11.2	37.9	39.9	38.4	36.8	38.8	39.9	2.3	3.8	1.6

Source: 2019, 2020 & 2021 D&B Data; Bank Data, 2019 & 2020 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 2019-21

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	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Buffalo-Cheektowaga NY MSA AA	3,720	406,343	95.2	26,144	84.7	62.0	38.5	5.0	29.7	10.3	8.3
NY Non MSA AA	30	3,004	0.8	231	82.3	60.0	32.5	4.5	33.3	13.2	6.7
Rochester NY MSA AA	157	20,243	4.0	20,582	85.6	52.9	31.9	4.8	33.8	9.6	13.4
Total	3,907	429,590	100.0	46,957	85.1	61.6	35.6	4.9	29.9	10.0	8.5

Source: 2019, 2020 & 2021 D&B Data; Bank Data, 2019 & 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%