



PUBLIC DISCLOSURE

Date of Evaluation: NOVEMBER 4, 2024

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Name of Depository Institution: CITIZENS & NORTHERN BANK

Institution's Identification Number: 895710

Address: 90-92 MAIN STREET

WELLSBORO, PENNSYLVANIA

**FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PENNSYLVANIA 19106**

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 the safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

INSTITUTION'S CRA RATING.....	1
INSTITUTION'S CRA RATING: SATISFACTORY.....	1
PERFORMANCE TEST RATINGS TABLE	1
SUMMARY OF MAJOR FACTORS SUPPORTING RATING	1
INSTITUTION	2
DESCRIPTION OF INSTITUTION	2
SCOPE OF EXAMINATION.....	5
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	7
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES.....	14
COMMONWEALTH OF PENNSYLVANIA_STATE RATING.....	15
SUMMARY OF MAJOR FACTORS SUPPORTING RATING	15
SCOPE OF EXAMINATION.....	15
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	16
PA NON-MSA ASSESSMENT AREA_FULL-SCOPE REVIEW	18
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	30
PHILADELPHIA, PA ASSESSMENT AREA_FULL-SCOPE REVIEW.....	47
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	60
WILLIAMSPORT, PA ASSESSMENT AREA_LIMITED-SCOPE REVIEW	77
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	83
YORK, PA ASSESSMENT AREA_LIMITED-SCOPE REVIEW	87
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	92
LANCASTER, PA ASSESSMENT AREA_LIMITED-SCOPE REVIEW.....	95
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	101
NY NON-MSA ASSESSMENT AREA_FULL-SCOPE REVIEW	104
STATE RATING	104
SCOPE OF EXAMINATION.....	104
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	114
CRA APPENDICES	128
CRA APPENDIX A: SCOPE OF EXAMINATION TABLE.....	129
CRA APPENDIX B: SUMMARY OF STATE RATINGS.....	130
CRA APPENDIX C: GLOSSARY.....	131
CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES	135
CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES	172
CRA APPENDIX F: ASSESSMENT AREA MAPS	191

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: SATISFACTORY

The following table indicates the performance level of Citizens & Northern (C&N) with respect to the lending, investment, and service tests.

PERFORMANCE TEST RATINGS TABLE

PERFORMANCE LEVELS	Citizens & Northern		
	PERFORMANCE TESTS		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

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

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include:

- A high percentage of loans are made in the bank's assessment area;
- The distribution of borrowers reflects adequate penetration among retail customers of different income levels, and business customers of different sizes;
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The bank makes a relatively high level of community development loans;
- The bank has made a significant level of qualified community development investments and grants; and
- The bank's delivery systems are reasonably accessible.

INSTITUTION

DESCRIPTION OF INSTITUTION

C&N was rated satisfactory at its previous CRA evaluation by the Federal Deposit Insurance Corporation (FDIC) dated January 31, 2022, which used the Interagency Large Institution CRA Examination Procedures.

C&N is a state-chartered, full-service commercial bank headquartered in Wellsboro, Tioga County, Pennsylvania. The institution offers a variety of commercial and consumer banking services through 28 branch offices¹ located in Bradford, Bucks, Cameron, Chester, Lancaster, Lycoming, McKean, Potter, Sullivan, Tioga, and York counties in Pennsylvania, and in Steuben County in New York.

Using 2015 American Community Survey (ACS) data, the bank operated 29 branches. Of these branches, one (nearly 4%) was located in a moderate-income census tract, 25 (86%) were located in middle-income census tracts, and three (just over 10%) were located in upper-income census tracts.

Using 2020 data, the bank operated 28 branches. Of these, three were located in moderate-income census tracts (11%), 20 were located in middle-income tracts (71%), and the remaining five branches were located in upper-income census tracts (18%). In addition to its full-service branches, the bank operated one loan production office (LPO) outside of its assessment areas, in Chemung County, New York.

The bank is a wholly-owned subsidiary of Citizens & Northern Corporation (CNC), a financial holding company with consolidated assets of over \$2.6 billion as of December 31, 2024, located in Wellsboro, Pennsylvania. C&N is the sole banking subsidiary, and primary operating subsidiary of CNC. Other subsidiaries under the holding company include Citizens & Norther Investment Corporation, and Bucktails Life Insurance Company.

The table below details the locations of C&N's full-service branches and LPO as of the CRA evaluation date.

Citizens & Northern Bank Branch Locations			
Metropolitan Area	County	State	Number of Branches
PA Non-MSA Assessment Area	Bradford, Cameron, McKean, Potter, Sullivan, and Tioga	PA	16
Philadelphia, PA Assessment Area	Bucks and Chester	PA	3
NY Non-MSA Assessment Area	Steuben	NY	1
Williamsport, PA Assessment Area	Lycoming	PA	5
York, PA Assessment Area	York	PA	1
Lancaster, PA Assessment Area	Lancaster	PA	1
Total Full-Service Branches			27
Chemung County	Chemung	NY	1
Total Limited-Service Branches			1
TOTAL BRANCHES			28

¹Since the previous CRA evaluation, the bank closed four branches, and opened one. Closures and openings are discussed in more detail under each affected assessment area.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

According to the Consolidated Reports of Condition and Income (Call Report), as of June 30, 2024, C&N reported \$2.6 billion in assets, of which \$1.9 billion were loans.

On a dollar volume basis, commercial loans (comprised of commercial mortgages and commercial and industrial loans) were the most significant credit product offered by the bank, and comprised nearly \$929 million as of June 30, 2024, or 49% of the bank's loan portfolio. Residential mortgage loans (comprised of closed-end and open-end loans secured by residential properties, and multifamily loans) represent the second largest segment of the bank's loan portfolio at \$674.4 million, or 36% of the bank's loan portfolio. Construction and land development loans comprise the third greatest portion of the bank's loan portfolio, at \$153 million (8%).

The composition of the bank's loan portfolio as of June 30, 2024 is presented in the table below.

Citizens & Northern Bank		
LOANS as of 06/30/2024	\$ (000s)	%
Loans Secured by Nonfarm Nonresidential properties (Commercial Mortgages)	785,998	41.5
Commercial and Industrial Loans	142,884	7.5
Secured by Farmland	9,279	0.5
Secured by Residential Properties (Closed-end)	556,921	29.4
Secured by Residential Properties (Open-end)	48,991	2.6
Secured by Multifamily Residential Properties	68,513	3.6
Construction & Land Development	152,942	8.1
Consumer Loans	20,503	1.1
Loans to Finance Agricultural Production & Other Loans to Farmers	2,732	0.1
States and Political Subdivisions	93,480	4.9
Other Loans	12,665	0.7
Other Leases	0	0.0
TOTAL LOANS	1,894,908	100.0

Source: June 30, 2024 Consolidated Reports of Condition and Income, Schedule RC-C Part 1. Loans classified as closed-end loans secured by residential real estate include business purpose loans collateralized by residential properties.

Small Business Loans

Schedule RC-C Part II (Loans to Small Businesses and Small Farms) of the Call Report, as of June 30, 2024, indicates that \$279.3 million (30.1%) of the bank's outstanding commercial loans² were designated as small business loans. For the purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less, as detailed in the following table.

² Commercial loans are comprised of loans secured by nonfarm, nonresidential properties, along with commercial and industrial loans.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Small Business Loans		
	Amount Outstanding as of 06/30/2024 \$ (000s)	%
Loans with original amounts of \$100,000 or less	23,088	2.5
Loans with original amounts of \$100,001 through \$250,000	43,841	4.7
Loans with original amounts of \$250,001 to \$1 million	212,385	22.9
TOTAL SMALL BUSINESS LOANS	279,314	30.1
Loans with original amounts of more than \$1,000,000	649,568	69.9
TOTAL COMMERCIAL LOANS	928,882	100.0

The bank's asset size and financial condition indicates that it has the ability to effectively meet the credit needs of its assessment areas. There are no legal or other impediments that would hamper the bank's ability to meet community needs.

DESCRIPTION OF ASSESSMENT AREAS

For the purposes of CRA, C&N has designated six assessment areas, as follows:

1. The PA Non-MSA assessment area, which consists of the entirety of Bradford, Cameron, McKean, Potter, Sullivan, and Tioga Counties, located in nonmetropolitan areas of Pennsylvania.
2. The Philadelphia, PA assessment area, which consists of two Metropolitan Divisions (MDs): the Montgomery-Bucks-Chester County, PA MD, which consists of Montgomery, Bucks, and Chester counties; and the Philadelphia, PA MD, which consists of Delaware and Philadelphia Counties. Both MDs are part of the larger Philadelphia-Camden-Wilmington PA-NJ-DE-MD Metropolitan Statistical Area (MSA).
3. The Williamsport, PA assessment area, which consists of Lycoming County, PA, and is coterminous with the Williamsport, PA MSA.
4. The York, PA assessment area, which consists of York County, PA, and is coterminous with the York-Hanover, PA MSA.
5. The Lancaster, PA assessment area, which consists of Lancaster County, PA and is coterminous with the Lancaster, PA MSA.
6. The NY Non-MSA assessment area, which consists of the entirety of Steuben County, located in a nonmetropolitan area of New York.

The bank's assessment areas were determined to comply with the requirements of the CRA, and do not arbitrarily exclude low- or moderate-income census tracts.

It is noteworthy that the York, PA and Lancaster, PA assessment areas were established just prior to the previous CRA evaluation. As they were new at the time of the previous evaluation, they were not included in the CRA analysis, and as a result, are being evaluated for the first time during this current evaluation.

Further, the bank's Philadelphia, PA assessment area expanded from the previous evaluation, when it consisted only of the Montgomery-Bucks-Chester County, PA MD. As discussed above, the

Philadelphia, PA assessment area now includes the Montgomery-Buck-Chester, PA MD and the Philadelphia, PA MD.

SCOPE OF EXAMINATION

The current evaluation of C&N's CRA performance covers the period from February 1, 2022, through November 4, 2024, and was conducted using the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors of the Federal Reserve System.

Under the lending test, loan products evaluated included³:

- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with purpose "not applicable," collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank in calendar years 2021, 2022, and 2023⁴;
- Small business loans reported by the bank pursuant to the CRA for calendar years 2021, 2022, and 2023; and
- Other loans that qualified as community development loans during the entire evaluation period from February 1, 2022, through November 4, 2024.

In total, within the bank's assessment areas, the bank originated 2,599 HMDA loans totaling almost \$480.2 million, 1,681 CRA small business loans totaling nearly \$221.2 million, and 108 small farm loans totaling almost \$2.9 million. Because the bank originated more HMDA loans, both by number and dollar volume, than small business loans, HMDA loans were generally given the most weight in determining C&N's overall rating, followed by small business loans. Though HMDA loans were weighted more heavily than small business loans overall, there are some exceptions. In the Philadelphia, PA, York, PA, and Lancaster, PA assessment areas, small business loans were provided with more weight, due to the number and dollar volume of lending in those particular

³ During the evaluation period, the bank also extended 108 small farm loans totaling nearly \$2.9 million in its assessment areas. Small farm loans were not considered in borrower or geographic distribution analyses, as analysis of such a small number of loans would not yield meaningful conclusions in these analyses. Small farm loans are included in the lending activity and assessment area concentration analyses.

⁴ On January 18, 2018, the Consumer Financial Protection Bureau's (CFPB) amendments to Regulation C became effective. See 80 FR 66128 (Oct. 28, 2015) (1) the types of institutions that are subject to Regulation C (covered institutions); (2) the types of transactions that are subject to Regulation C (covered loans); (3) the types of data that institutions are required to collect, record and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data.) The Board of Governors, along with other agencies, amended their regulations implementing the CRA to conform with the CFPB regulation changes. Of note, changes include the "home-mortgage loan" definition in the CRA regulations to mean a "closed-end mortgage loan" or an "open-end line of credit," as those terms are defined in, and that are not excluded transactions under, amended Regulation C. As a result, home improvement loans that are not secured by a dwelling, which were previously required to be reported under Regulation C, are no longer reportable transactions; Home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the financial institution under Regulation C, are now covered transactions under HMDA; Also, "home equity loan" was deleted from the CRA definition of "consumer loan" because home equity loans are now included within the CRA definition of "home-mortgage loan." Finally, the CFPB amended the HMDA reporting thresholds. Institutions must report closed-end, dwelling-secured loans if they originate at least 25 in each of the two preceding calendar years, and must report open-end, dwelling-secured lines of credits if they originated at least 200 in each of the two preceding calendar years.

assessment areas. Additional details on these weighting decisions are contained in the assessment area discussions.

C&N's HMDA and small business loans were compared to the aggregate of all lenders in the bank's assessment areas that report home-mortgage loans pursuant to HMDA, and small business and small farm loans pursuant to CRA. These data are reported annually.

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. Demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, demographic data provides a business context for the bank's performance in the assessment areas in which it operates. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition.

For purposes of evaluating the geographic distribution of loans by census type, census tracts were classified on the basis of 2015 ACS data for loans originated in 2021, and on the basis of 2020 Census data for loans originated in 2022, and 2023. The distribution of HMDA loans to borrowers of different income levels was based upon annually-adjusted median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2015 ACS data in 2021, and 2020 Census data in 2022, and 2023, unless otherwise noted.

For small business and small farm loans, examiners used annual Dun & Bradstreet data for comparison purposes for the applicable years. Dun & Bradstreet collects and publishes this self-reported data detailing the revenues and locations of local businesses.

To supplement economic, demographic and performance data, and to gain a better perspective on community credit needs, interviews were conducted with nine community representatives within the bank's six assessment areas. Discussions were held with four community contacts focused on affordable housing, three involved in economic development, and three community action agencies within the bank's assessment areas. More information about the contacts and the community development and credit needs identified by the contacts is available in the discussions of each assessment area.

For purposes of assessing the bank's overall CRA performance, the greatest weight was given to the bank's performance in the Commonwealth of Pennsylvania, where a substantial majority of the bank's operations, deposits, and lending were located. Specifically, 27 of the bank's branches (96%) were located in Pennsylvania. These branches held 96% of the bank's total deposits. Finally, 96% of the bank's loans by number, and 97% of loans by dollar volume were made in the Pennsylvania assessment areas.

In reaching statewide conclusions within the Commonwealth of Pennsylvania, greatest weight was given to the bank's performance in the PA Non-MSA assessment area, followed by the Philadelphia, PA assessment area, the Williamsport, PA, York, PA, and Lancaster, PA assessment areas, as detailed below.

A full-scope review was conducted in the PA Non-MSA assessment area, which held a majority of the bank's operations and lending. Seventeen of the bank's 28 branches (61%) were located in this assessment area, and these branches generated 60% of the bank's total deposits. From a loan perspective, 64% of the bank's total loans by number, and 46% by dollar volume were made within the PA Non-MSA assessment area.

The Philadelphia, PA assessment area also was evaluated using full-scope review procedures. During the evaluation period, the bank operated three branches (11%) within the assessment area, and these branches generated 20% of deposits, and 20% of the bank's total loans by number, and 40% by dollar volume.

The Williamsport, PA assessment area was evaluated using limited-scope review procedures, where performance was compared with that in the full-scope areas in the state to determine if it exceeded, was consistent with, or was below the performance in the full-scope areas. During the evaluation period, the bank operated five branches (18%) within the assessment area, and these branches generated 14% of deposits, 10% of loans by number, and 9% of loans by dollar volume.

Similarly, the York, PA assessment area was evaluated using limited-scope review procedures. During the evaluation period, the bank operated one branch (4%) within the assessment area, which generated 1% of deposits, 1% of loans by number, and just under 2% of loans by dollar volume.

Finally, the Lancaster, PA assessment area was also evaluated using limited-scope review procedures. During the evaluation period, the bank operated one branch (4%) within the assessment area, and this branch generated less than 1% of deposits, 1% of loans by number, and just under 2% of loans by dollar volume.

Finally, the least amount of weight in determining the overall CRA rating was assigned to performance in the State of New York. In reaching statewide conclusions for the State of New York, performance was based solely on performance in the NY Non-MSA assessment area, the bank's only assessment area in the state. C&N operated one branch (4%) in the NY Non-MSA assessment area, which generated 4% of total deposits, 4% of loans by number, and less than 3% of loans by dollar volume. The assessment area was reviewed using full-scope review procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Performance under the lending test is rated low satisfactory. The lending test evaluated an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Concentration of lending within assessment areas, including HMDA, and small business lending;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of different sizes, including small businesses;

LARGE INSTITUTION PERFORMANCE EVALUATION

NOVEMBER 2024

- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

Overall, C&N's lending levels reflect good responsiveness to the credit needs of its assessment areas.

As indicated previously, as of June 30, 2024, C&N reported total loans of \$1.9 billion, or 73% of total bank assets. At the previous evaluation conducted as of January 31, 2022, total loans measured just under \$1.6 billion and represented 68% of total assets.

The bank's loan-to-deposit ratio averaged 87% over the 10-quarter period ending June 30, 2024, while the peer group averaged 80% over the same time frame.⁵

The table below depicts the bank's HMDA, small business, and small farm lending activity during the evaluation period.

Citizens & Northern Bank Summary of Lending Activity				
Loan Types	#	%	\$ (000s)	%
Home Improvement	244	4.7	21,563	2.4
Home Purchase	1,476	28.6	291,649	32.6
Multifamily Housing	94	1.8	150,718	16.9
Other Purpose Closed-End	176	3.4	12,659	1.4
Other Purpose LOC	312	6.0	28,371	3.2
Refinancing	775	15.0	119,959	13.4
Total HMDA related	3,077	59.6	624,918	69.9
Total Small Business related	1,951	37.8	265,189	29.7
Total Small Farm related	131	2.5	4,193	0.5
TOTAL LOANS	5,159	100.0	894,300	100.0

Assessment Area Concentration

An analysis was performed to determine the volume of loans extended inside and outside of the bank's assessment areas. The analysis consisted of an evaluation of C&N's HMDA and small business loans. The assessment area concentration analysis indicated that a high percentage of loans are made in the bank's assessment areas.

⁵ C&N's Uniform Bank Performance Report (UBPR) peer group includes insured commercial banks having assets between \$1 billion and \$3 billion.

LARGE INSTITUTION PERFORMANCE EVALUATION

NOVEMBER 2024

More specifically, during the evaluation period, C&N made 85% of its HMDA loans by number, and 77% by dollar amount in the bank's assessment areas. This level of lending was similar to the previous examination, when 83% of HMDA loans by number and 79% by dollar were originated in the assessment areas.

With respect to small business loans, 86% of the number of small business loans, and 83% of the aggregate dollar amount of loans were extended in the bank's assessment areas. This represented an increase in the concentration of lending from the previous evaluation, when 81% of small business loans by number and 76% by dollar amount were originated in the bank's assessment areas.

Overall, 85% of all loans by number, and 79% of loans by dollar volume, were made within the six assessment areas included in the evaluation. Again, this concentration improved slightly from the previous evaluation, when 82% of loans by number, and 78% by dollar volume, were made within the bank's delineated assessment areas.

The table on the following page shows the distribution of lending inside and outside the bank's assessment areas.

Citizens & Northern Bank Lending Inside and Outside the Assessment Areas								
Loan Types	Inside				Outside			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Home Improvement	230	94.3	20,111	93.3	14	5.7	1,452	6.7
Home Purchase – Conventional	1,179	79.9	225,955	77.5	297	20.1	65,694	22.5
Multifamily Housing	62	66.0	94,647	62.8	32	34.0	56,071	37.2
Other Purpose Closed-End	158	89.8	10,480	82.8	18	10.2	2,179	17.2
Other Purpose LOC	285	91.3	26,392	93.0	27	8.7	1,979	7.0
Refinancing	685	88.4	102,582	85.5	90	11.6	17,377	14.5
Total HMDA related	2,599	84.5	480,167	76.8	478	15.5	144,751	23.2
Total Small Business related	1,681	86.2	221,183	83.4	270	13.8	44,006	16.6
Total Small Farm related	108	82.4	2,851	68.0	23	17.6	1,342	32.0
TOTAL LOANS	4,388	85.1	704,201	78.7	771	14.9	190,099	21.3

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

Overall, C&N's distribution of HMDA loans among borrowers of different income levels, including low- and moderate-income borrowers is adequate, due to adequate performance in the PA Non-MSA assessment area, and poor performance in the Philadelphia, PA assessment area. Performance in the Williamsport, PA assessment area was consistent with performance in the two full-scope assessment areas in Pennsylvania, and performance in the Lancaster, PA and York, PA assessment areas was below the bank's statewide performance. Borrower distribution of HMDA loans was adequate in the NY Non-MSA assessment area.

The geographic distribution of HMDA loans reflects adequate penetration throughout the bank's assessment areas, including low- and moderate-income census tracts, due to adequate performance

in the PA Non-MSA assessment area, and good performance in the Philadelphia, PA assessment area. Performance in the Williamsport, PA assessment area was consistent with performance in the bank's two full-scope assessment areas in Pennsylvania, and performance in the York, PA and Lancaster, PA assessment areas was below that of the full-scope areas. Geographic distribution of HMDA loans was adequate in the NY Non-MSA assessment area.

Small Business Lending

Overall, C&N's distribution of small business loans reflects adequate penetration throughout the bank's assessment areas, driven by the bank's good performance in the PA Non-MSA assessment area, and adequate performance in the Philadelphia, PA assessment area. Performance in the Williamsport, PA assessment area was consistent with the bank's performance in Pennsylvania, while performance in the York, PA and Lancaster, PA assessment areas was below performance in the full-scope areas. Finally, performance in the NY Non-MSA assessment area was adequate.

The geographic distribution of small business loans reflects adequate penetration throughout the bank's assessment areas, driven by poor performance in the PA Non-MSA assessment area, and adequate performance in the Philadelphia, PA assessment area. Performance in the Williamsport, PA assessment areas was above the bank's performance in the full-scope Pennsylvania assessment areas, while bank performance in the York, PA and Lancaster, PA assessment areas was below full-scope performance. Finally, geographic distribution of small business loans was good in the NY Non-MSA assessment area.

Responsiveness to Credit Needs

Overall, C&N exhibits an adequate record of serving the credit needs of low- and moderate-income individuals and very small businesses. Affordable housing was a credit need identified by community contacts in many of the bank's assessment areas, and the bank's HMDA lending record shows that home-mortgage loans are being originated throughout the assessment areas, including an adequate number being made to low- and moderate-income borrowers, and in low- and moderate-income areas.

Lending to small businesses, particularly for new businesses and entrepreneurs, was also a need expressed by multiple community contacts throughout the bank's footprint. The bank's retail small business lending shows that such loans are being made throughout the assessment areas.

More detail on the bank's responsiveness to credit needs can be found within individual assessment area discussions.

Innovative and Flexible Lending Practices

C&N makes use of several innovative and/or flexible lending programs in meeting credit needs in its assessment areas. The bank participated in a variety of programs to meet the credit needs of low- and moderate-income individuals and small businesses, as summarized below and detailed in the discussions for each assessment area.

Often, the home-mortgage credit needs of low- and moderate-income borrowers can be effectively addressed by alternative mortgage products, which have more flexible credit terms than traditional home financing.

Throughout its assessment areas, C&N offers two such in-house mortgage products, namely a First Time Homebuyer Loan Program, with flexible income requirements and underwriting criteria, and an Emergency Loan Relief Program, for borrowers affected by unexpected natural disasters. The bank also offers loans through the Federal Housing Administration (FHA); the U.S. Department of Veterans Affairs (VA); the U.S. Department of Agriculture (USDA); the Pennsylvania Housing Finance Agency (PHFA); Fannie Mae; and the Federal Home Loan Bank (FHLB) of Pittsburgh.

In total during the evaluation period, C&N originated 17 C&N First Time Homebuyer loans totaling \$2.6 million; 13 Emergency Loan Relief Program loans totaling \$425 thousand; 21 FHA loans totaling over \$3.9 million; six VA loans totaling \$1.2 million; three USDA loans totaling \$545.5 thousand; four PHFA loans totaling \$607.8 thousand; 28 Fannie Mae HomeReady loans totaling \$3.2 million; three FHLB of Pittsburgh Housing Impact Mortgage Partnership Finance Loans totaling almost \$300 thousand; and nine FHLB of Pittsburgh First Front Door downpayment and closing cost grants totaling just under \$120 thousand in its assessment areas.

Similarly, to address the credit needs of small businesses in its assessment areas, C&N participates in loan programs under the Small Business Administration (SBA), Farm Service Agency (FSA), and the FHLB of Pittsburgh's Banking on Business program. In total, the bank made five SBA loans totaling nearly \$1.4 million, four SBA 504 loans totaling \$3.6 million, one FSA loan totaling \$180 thousand and originated two FHLB of Pittsburgh Banking on Business loans totaling \$423 thousand in its assessment areas.

All special program loans are discussed in more detail by assessment area throughout this Performance Evaluation.

Community Development Lending Activities

C&N made a relatively high level of community development loans. During the evaluation period, the bank originated 51 community development loans totaling \$66.8 million within its assessment areas. The number and dollar amount of community development loans increased from the previous evaluation, where the bank made 42 community development loans totaling \$20.7 million.

By dollar amount, the bank's community development lending was highest in the Philadelphia, PA assessment area (32 loans totaling \$57.8 million, or 87% of total community development lending in its assessment areas), followed by the PA Non-MSA assessment area (16 loans totaling \$6.9 million, or 10%), and the Williamsport, PA assessment area (three loans totaling \$2.1 million, or 3%). The bank made no community development loans in its York, PA, Lancaster, PA, or NY Non-MSA assessment areas.

By purpose, 87% of community development loan dollars within the bank's assessment areas were for activities that revitalized or stabilized low- or moderate-income geographies, 10% went to affordable housing activities for low- and moderate-income individuals, and 3% provided community development services to low- and moderate-income individuals.

In addition to community development loans made within its assessment areas, C&N made seven community development loans totaling \$22.6 million in the greater statewide region in the Commonwealth of Pennsylvania, and one loan totaling \$745 thousand in the greater statewide region in New York.

Because the bank adequately met the community development needs within the evaluated assessment areas, these community development loans also receive consideration.

The bank's community development lending performance is discussed in more detail by assessment area throughout this Performance Evaluation.

INVESTMENT TEST

Performance under the investment test is rated high satisfactory. The investment test was rated high satisfactory in the Commonwealth of Pennsylvania, and low satisfactory in the State of New York.

Overall, C&N has a significant level of qualified investments and donations, which exhibit good responsiveness to community development needs. Qualified investments and donations in the bank's six assessment areas totaled \$30.0 million, an increase from the previous evaluation when the bank invested \$14.1 million.

The majority of investment dollars were made in the Philadelphia, PA assessment area (\$14.7 million or 49%), followed by the PA Non-MSA assessment area (\$6.4 million or over 21%), the NY Non-MSA (\$2.7 million or 9%), the Williamsport, PA assessment area (\$2.5 million or over 8%), the Lancaster, PA assessment area (\$2.1 million or 7%), and finally the York, PA assessment area (\$1.6 million or 5%).

Of the assessment area investments, 75% supported affordable housing for low- and moderate-income individuals, 24% supported community services targeted to low- and moderate-income individuals, 1% supported revitalization/stabilization efforts, and less than 1% supported economic development in the assessment areas.

In addition to the investments within the assessment areas discussed above, the bank also made two investments totaling \$505 thousand in the broader statewide regions in Pennsylvania. Because the bank adequately met the community development needs of its assessment areas, these investments receive consideration.

C&N exhibits good responsiveness to the credit and community development needs of its assessment areas. The vast majority of the bank's qualified investments and donations supported affordable housing, a primary needs noted by community contacts.

Finally, C&N makes occasional use of innovative and/or complex investments to support community development initiatives when such opportunities exist.

The bank's investment test performance is discussed in more detail by assessment area throughout the Performance Evaluation.

SERVICE TEST

Performance under the service test is rated low satisfactory. The service test was rated low satisfactory in both the Commonwealth of Pennsylvania and in the State of New York.

Branch delivery systems, as well as alternative delivery systems such as automated teller machines (ATMs) and online banking are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. As noted previously, C&N provides retail services through its 27 full-service branches, 26 (96%) of which are located in Pennsylvania, and one (4%) of which is located in New York.

By assessment area, branch locations are as follows: 16 branches are located in the PA Non-MSA assessment area (59%); five are located in the Williamsport, PA assessment area (19%); three are located in the Philadelphia, PA assessment area (11%); one is located in the York, PA assessment area (almost 4%); one is located in the Lancaster, PA assessment area (almost 4%); and one is located in the NY-Non MSA assessment area (almost 4%).

C&N's record of opening and closing branches has not affected the accessibility of delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals. Since the previous evaluation, the bank has closed four branches and opened one branch.⁶ At the time of the branch closings, three of the branches were located in middle-income census tracts, and one was located in an upper-income census tract. The opened branch was located in an upper-income census tract.

Overall, banking services do not vary in a way that inconveniences the bank's constituents, particularly low- and moderate-income consumers in the bank's assessment areas. Generally, hours of operation are reasonable, with the majority of the bank's branches offering extended business hours at least once a week. The majority of bank branches offer ATMs and drive-up services, with roughly half offering Saturday hours. Differences are discussed in more detail by assessment area.

Finally, C&N provides an adequate level of community development services in its assessment areas. More specifically, the bank provides an adequate level of community development services in both the Commonwealth of Pennsylvania and in the State of New York. It is noted that financial literacy was a need expressed by community contacts in the bank's assessment areas. Throughout its assessment areas, and most prevalently in its PA Non-MSA assessment area, C&N provided first time home-buyer classes to low- and moderate-income individuals, and financial literacy presentations in retirement centers, and in schools where over half of students qualified for free and reduced lunch,

The bank's service test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

⁶During the evaluation period, the bank closed four branches: two in the PA Non-MSA assessment area, one in the NY Non-MSA assessment area, and one in the Philadelphia, PA assessment area. The branch opened during the evaluation period was located in the Philadelphia, PA assessment area. Further discussion is present in the evaluation of each assessment area.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

C&N is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices, inconsistent with helping to meet community credit needs, was identified.

COMMONWEALTH OF PENNSYLVANIA

STATE RATING

Performance Test	Performance Level
Lending	Low Satisfactory
Investment	High Satisfactory
Service	Low Satisfactory
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects adequate penetration among retail customers of different income levels and business customers of different sizes;
- The geographic distribution of loans reflects adequate penetration throughout the Commonwealth of Pennsylvania;
- The bank makes use of innovative and/or flexible lending practices;
- The bank makes a relatively high level of community development loans;
- The bank made a significant level of qualified community development investments and grants; and
- The bank's delivery systems are reasonably accessible.

SCOPE OF EXAMINATION

C&N's CRA performance in the Commonwealth of Pennsylvania was evaluated for the period from February 1, 2022 through November 4, 2024. The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development loans.

As mentioned previously, examiners completed full-scope reviews in the PA Non-MSA, and Philadelphia, PA assessment areas, as the majority of the bank's operations are in these assessment area, including branches, as well as deposit and lending production. Limited-scope reviews were conducted in the Williamsport, PA, York, PA, and Lancaster, PA assessment areas.

As discussed earlier, for purposes of assessing C&N's overall CRA performance, more weight was given to the performance in the Commonwealth of Pennsylvania than in the State of New York.

DESCRIPTION OF INSTITUTION'S OPERATIONS

In the Commonwealth of Pennsylvania, the majority of the bank's business was conducted in the PA-Non MSA assessment area, and thus this assessment area was given the greatest weight in

determining the CRA rating for the Commonwealth of Pennsylvania. Of the bank's 27 branches, 16 (59%) were located in this assessment area, and these branches generated 60% of the bank's total deposits as of June 30, 2024. From a loan perspective, 64% of the bank's total loans by number, and 46% by dollar volume were made within the PA Non-MSA assessment area.

The Philadelphia, PA assessment area was given the second highest weight in determining performance in Pennsylvania. During the evaluation period, the bank operated three branches (11%) within this assessment area, and these branches generated 20% of deposits. From a loan standpoint, 20% of the bank's total loans by number, and 40% by dollar volume were made within the Philadelphia, PA assessment area.

The Williamsport, PA assessment area was given the third highest weight in determining performance in Pennsylvania. During the evaluation period, the bank operated five branches (18%) within the assessment area, and these branches generated 14% of deposits. From a loan standpoint, 10% of loans by number, and 9% of loans by dollar volume were made within the Williamsport, PA assessment area.

The York, PA assessment area was given the fourth highest weight in determining performance in Pennsylvania. During the evaluation period, the bank operated one branch (4%) within the assessment area, and this branch generated 1% of deposits. From a loan standpoint, 1% of loans by number, and 2% of loans by dollar volume were made within the York, PA assessment area.

Finally, the Lancaster, PA assessment area was given the lowest weight in determining performance in Pennsylvania. During the evaluation period, the bank operated one branch (4%) within the assessment area, and this branch generated less than 1% of deposits. From a loan standpoint, 1% of loans by number, and 2% of loans by dollar volume were made within the Lancaster, PA assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overall, the lending test was determined to be low satisfactory in the Commonwealth of Pennsylvania. Primary drivers of the overall lending test rating were the borrower and geographic distribution of loans, the bank's use of innovative and/or flexible lending products, and community development lending. It is noted that borrower distribution was weighted more heavily than geographic distribution, given the demographics of the Pennsylvania assessment areas. More detail on lending test components is provided in the discussions of each Pennsylvania assessment area.

INVESTMENT TEST

Overall, the investment test was determined to be high satisfactory in the Commonwealth of Pennsylvania. The investment test rating was driven by the amount of qualified investments and donations, with additional consideration given to the responsiveness, innovativeness, and complexity of such investments. More detail on the investment test components is provided in the discussions of each Pennsylvania assessment area.

SERVICE TEST

Overall, the service test was determined to be low satisfactory in the Commonwealth of Pennsylvania. The service test was influenced by retail service aspects, particularly the accessibility of delivery systems and reasonableness of hours and services in serving assessment area needs, as well as the level of community development services provided by the bank in the Commonwealth of Pennsylvania. More detail on the service test components is provided in the discussions of each Pennsylvania assessment area.

PA NON-MSA ASSESSMENT AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of the Assessment Area

C&N's PA Non-MSA assessment area consists of the entirety of Bradford, Cameron, McKean, Potter, Sullivan, and Tioga Counties in Pennsylvania. The assessment area is situated in north central Pennsylvania, and had a population of 176,023 according to the 2015 ACS, and 168,227 as of the 2020 Census.

For the purposes of assessing C&N's CRA performance in the Commonwealth of Pennsylvania, and overall, the PA Non-MSA assessment area was given the greatest weight. Of the bank's total loans, 64% by number, and 46% by dollar volume were originated in the PA Non-MSA assessment area. Of the bank's assessment areas, the PA Non-MSA assessment area had the highest volume of deposits, accounting for 60% of the bank's total deposits (just under \$1.3 billion). Additionally, 59% of the bank's 27 branches (16 branches) were located in the assessment area.

C&N's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the PA Non-MSA assessment area contained 45 census tracts. Of these, one tract (2%) was designated as low-income, one tract (2%) was a moderate-income tract, 40 (89%) were middle-income tracts, and three (7%) were upper-income census tracts.

According to the 2020 Census data, the PA Non-MSA assessment area contained 50 census tracts. Of these, no tracts were designated as low-income, while six (12%) were designated as moderate-income, 43 (86%) were middle-income, and one (2%) was an upper-income census tract.

It is noteworthy that several counties in the assessment area were designated as distressed or underserved middle-income tracts. Nonmetropolitan middle-income census tracts are considered to be distressed when they meet defined criteria regarding poverty rates, unemployment levels, or population loss. Nonmetropolitan middle-income tracts are considered to be underserved when they meet criteria for population size, density, and dispersion that indicate that the area's population is sufficiently small, thin, and distant from a population center that it would have difficulty financing the fixed costs of meeting essential community needs, such as essential infrastructure, communication services, public health services, etc.

In 2021, Potter County was designated as distressed, Sullivan County as underserved, and Cameron County as both distressed and underserved. In 2022, Sullivan County was designated as underserved, and Cameron County as distressed and underserved. Finally, in 2023, the counties of McKean, Potter, and Sullivan were classified as distressed, while Cameron County was once again distressed and underserved.

Maps of the assessment area at the time of the 2015 ACS, and the time of the 2020 Census are available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2024, there were 11 depository institutions operating in the bank's PA Non-MSA assessment area. These institutions maintained a total of 65 branches, holding \$4.2 billion in deposits. C&N, with 17 branches in the assessment area, ranked first, with almost \$1.3 billion, or 30% of the deposit market. First Citizens Community Bank ranked second with 15 branches holding \$1.1 billion (26%) of the deposit market, followed by Northwest Bank with 11 branches holding \$716.3 million (17%) of the deposit market.

C&N reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2021, a total of 254 institutions reported 4,476 HMDA loan originations and purchases within the assessment area. C&N ranked first in the HMDA market with 16% of the HMDA market. Rocket Mortgage, LLC ranked second with 10% of the market share, followed by Northwest Bank with 8% of the HMDA market.

The 2022 aggregate HMDA data showed a decrease in overall HMDA lending, with 223 lenders originating and purchasing 3,357 home-mortgage loans in the assessment area. C&N led the HMDA market with 19% market share. Northwest Bank ranked second with 8% of the market, followed by Rocket Mortgage, LLC with just under 8% of the market.

Finally, the 2023 aggregate HMDA data showed a decrease in overall HMDA lending from the previous year, with 201 lenders originating 2,576 home-mortgage loans in the assessment area. C&N once again ranked first in the HMDA market with 22% of total originations and purchases. Northwest Bank ranked second in the HMDA market with 8% of the market, followed by First Citizens Community Bank with 7% of HMDA loans.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all small business and small farm lenders operating in the assessment area. This data is also reported annually. According to 2021 small business and small farm data, there were 85 CRA reporters in the assessment area, originating or purchasing a total of 3,120 small business and small farm loans. C&N ranked first, with 17% of the market. First Citizens Community Bank ranked second with 10% of all small business and small farm originations and purchases, followed by American Express, N.B., also with 10% of the market.

According to 2022 small business and small farm data, there were 75 CRA reporters in the assessment area, originating or purchasing a total of 2,555 small business and small farm loans. C&N ranked fifth with 8% of the market. American Express, N.B. ranked first with 15% of the market, followed by Synchrony Bank with 13% of the market, and JP Morgan Chase Bank, N.A. with 9% of the CRA market.

Finally, according to 2023 small business and small farm data, there were 71 CRA reporters in the assessment area, originating or purchasing a total of 2,188 small business and small farm loans. C&N ranked fifth with 8% of the market. American Express, N.B. once again ranked first with 18%

of the market, followed by Synchrony Bank with 13%, and JP Morgan Chase Bank, N.A. with almost 11% of the CRA market.

To supplement economic, demographic, and performance data, interviews were conducted with local community organizations, which provided perspective on credit and community development needs of the PA Non-MSA assessment area. Both interviews were held with agencies that focus on economic development.

According to the contacts, affordable housing is a critical need in the PA Non-MSA assessment area, as much of the existing housing stock is considered to be priced for middle- and upper-income buyers. Further, contacts indicate that companies in the area are losing workers due to a lack of affordable housing. Additionally, weatherization programs would be especially helpful to many in the assessment area, as much of the housing stock is dated, and in need of rehabilitation. Another noteworthy credit need is for small business lending, particularly “creative financing” for business owners who may not qualify for traditional business products. Finally, financial literacy programming was mentioned by both contacts as a service that would be helpful for individuals who may be planning to buy a house, start a business, or to begin budgeting.

Economic Characteristics

As indicated previously, the bank’s PA Non-MSA assessment area is located in the Northern Tier of Pennsylvania, and border the state of New York to the north. The counties that comprise the assessment area are in-between the economic centers of Williamsport to the south, Wilkes-Barre/Scranton to the east, and New York’s Southern Tier to the north.

Of the bank’s six assessment areas, the PA Non-MSA assessment area is one of the most rural and thinly populated areas, and it is noteworthy that population declined in each of the counties in the PA Non-MSA assessment area from the 2015 ACS to the 2020 Census. Brief descriptions of each county in the bank’s PA Non-MSA assessment area follows.

Bradford County

Bradford County is the easternmost county in the Northern Tier, and borders Susquehanna County to the east, Tioga County to the west, and the State of New York to the north. Bradford County is the second largest Pennsylvania county by land area, and is well-known for both agricultural and outdoor recreational activities, including hiking, hunting and fishing. Bradford County had a population of 62,228 residents according to the 2015 ACS, and a population of 59,967 residents according to the 2020 Census. The median family income was \$60,037 according to the 2015 ACS, and \$65,230 as of the 2020 Census.

The Pennsylvania Department of Labor and Industry reports that leading industries in the county include healthcare and social assistance, manufacturing, and retail trade. Leading employers included Robert Packer Hospital, Inc., Cargill Meat Solutions Corporation, Guthrie Medical Group, PC, The Guthrie Clinic, and Jen-Wen, Inc.

Cameron County

Cameron County is situated just south of McKean and Potter Counties to the north, and has the distinction of being the least populated county in the Commonwealth. As of the 2015 ACS, Cameron County had a population of 4,869 residents, and a population of 4,547 residents according to the 2020 Census. The median family income was \$51,167 according to the 2015 ACS, and \$50,294 as of the 2020 Census.

According to the Pennsylvania Department of Labor and Industry, top industries included manufacturing, public administration, and healthcare and social assistance. Leading employers included Metaldyne Sintered Ridgway, LLC, Cameron County School District, Emporium Hardwoods, and Embassy Powdered Metals Inc.

McKean County

McKean County is the westernmost county in the bank's PA Non-MSA assessment area, bordering NY to the north, Potter County to the east, and Warren County to the west. McKean County had a population of 42,884 residents according to the 2015 ACS, and a population of 40,432 residents according to the 2020 Census. The median family income was \$53,642 according to the 2015 ACS, and \$62,203 as of the 2020 Census.

According to the Pennsylvania Department of Labor and Industry, top industries in the county included manufacturing, healthcare and social assistance, and retail trade. Leading employers included Zippo Manufacturing Company, the federal government, Bradford Area School District, Bradford Hospital, WR Case & Sons Cutlery Company, and American Refining Group Inc.

Potter County

Potter County is located in-between McKean County to the west, and Tioga County to the east, and borders the state of New York to the north. The county is home to abundant game lands and forests, and boasts eight state parks. Potter County had a population of 17,377 residents according to the 2015 ACS, and a population of 16,396 residents according to the 2020 Census. The median family income was \$51,541 according to the 2015 ACS, and \$60,833 as of the 2020 Census.

According to the Pennsylvania Department of Labor and Industry, top industries in the county included healthcare and social assistance, manufacturing, and retail trade. Further, major employers included Charles Cole Memorial Hospital, Morris Compressors, Inc., state government, Zito Media, and Coudersport School District.

Sullivan County

Sullivan County is located south of Bradford County, and borders Wyoming County to the east, and Lycoming County to the west. Sullivan County is the second least populous county in the assessment area, and statewide. Sullivan County had a population of 6,381 residents according to the 2015 ACS, and a population of 5,840 residents according to the 2020 Census. The median family income was \$55,246 according to the 2015 ACS, and \$63,295 as of the 2020 Census.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

According to the Pennsylvania Department of Labor and Industry, leading industries were healthcare and social assistance, public administration, and retail trade. Major employers in the county included state government, Highlands Rehabilitation and Health, Sullivan County School District, Adams & Associates, Inc., and Arbor E & T, LLC.

Tioga County

Finally, Tioga County is situated in-between Bradford County to the east, and Potter County to the west, bordering New York to the north. As with the other rural counties in the assessment area, natural attractions, such as the Grand Canyon of Pennsylvania, are important draws to Tioga County. Tioga County is also home to Mansfield University. Tioga County had a population of 42,284 residents according to the 2015 ACS, and a population of 41,045 residents according to the 2020 Census. The median family income was \$55,683 according to the 2015 ACS, and \$61,621 as of the 2020 Census.

According to the Pennsylvania Department of Labor and Industry, top industries in the county were healthcare and social assistance, retail trade, and manufacturing. Major employers in the county included UPMC Wellsboro, Ward Manufacturing, LLC, Northern Tioga School District, and Westlake Management Services, Inc.

Seasonally unadjusted unemployment rates for each county in the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. During the evaluation period, seasonally unadjusted unemployment rates throughout the PA Non-MSA assessment area fell in each year as the region recovered from the high unemployment caused by the COVID-19 Pandemic. As reflected in the table, with the exception of Bradford County, unemployment rates in the counties comprising the assessment area were higher than those in the Commonwealth and nation as a whole. Overall, rates were lowest in Bradford County, and highest in Cameron County, over the three years evaluated.

Citizens & Northern Bank PA Non-MSA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
County	% 2021	% 2022	% 2023
Bradford County	5.2	3.9	3.3
Cameron County	7.1	5.3	5.0
McKean County	6.4	5.0	4.4
Potter County	6.4	5.5	4.8
Sullivan County	6.9	4.9	3.9
Tioga County	6.2	4.6	3.8
Commonwealth of Pennsylvania	5.9	4.1	3.4
United States	5.3	3.6	3.6

Unemployment data is from the Bureau of Labor Statistics.

Housing

2015 ACS Data

According to the 2015 ACS data, the PA Non-MSA assessment area contained 96,195 housing units, over 54% of which were owner-occupied, over 18% of which were rental units, and over 27% of which were vacant units. The overall occupancy rate in the assessment area (54%) was less than the occupancy rate of the Commonwealth of Pennsylvania, (61%), while the percentage of vacant units (27%) in the assessment area was much higher than the statewide average (11%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to 2015 ACS data, less than 1% of owner-occupied housing was located in low-income tracts, and 1% was located in moderate-income tracts. The overwhelming majority of owner-occupied housing (90%) was located in middle-income census tracts, and 8% of owner-occupied housing was located in upper-income tracts.

Of the total existing housing units, 76% were single-family units, 6% were two-to-four family units, 4% were multifamily units (five families or more), and 14% were mobile homes. The median age of the housing stock was 58 years, making it older than that in the Commonwealth of Pennsylvania, where the median age of housing was 54 years, indicating a potential need for home improvement loans for rehabilitation of the assessment area's housing stock. This need was anecdotally confirmed by community contacts.

Data shows that the price of housing in the assessment area is less expensive than in the Commonwealth overall. According to 2015 ACS data, the median housing value in the PA Non-MSA assessment area was \$108,089, which is much lower than the median housing value in the Commonwealth of Pennsylvania (\$166,000). Data shows a disparity between housing values in low- and moderate-income tracts compared to those in middle- and upper-income tracts. The median housing value in low-income tracts was \$45,574, and this increased to \$51,383 in moderate-income tracts. These values were significantly lower than median housing values in middle- and upper-income tracts (\$109,486 and \$117,544, respectively). Finally, in the assessment area, just under 47% of the total owner-occupied housing units were valued at less than \$100 thousand, compared to the Commonwealth, where 26% of owner-occupied housing units were valued at less than \$100 thousand.

Finally, median gross rent (rent plus utilities) was less expensive in the assessment area than in Pennsylvania. Median gross rent in the PA Non-MSA assessment area was \$641, which was well below the median gross rent in Pennsylvania of \$840. Within the PA Non-MSA assessment area, 40% of renters spent more than 30% of their income on rent, which is a slightly lower figure than in Pennsylvania as a whole (46%).

2020 Census Data

According to the 2020 Census data, the PA Non-MSA assessment area contained just over 97,635 housing units, 53% of which were owner-occupied, 19% of which were rental units, and 28% of

which were vacant units. The overall occupancy rate in the assessment area (53%) was below the occupancy rate of the Commonwealth of Pennsylvania (62%), and once again, the percentage of vacant units (28%) in the assessment area was much higher than the state level (11%).

According to 2020 Census data, almost 9% was located in moderate-income tracts. Once again, the majority of owner-occupied housing (90%) was located in middle-income census tracts, and 2% of owner-occupied housing was located in upper-income tracts. There were no low-income census tracts reported as of the 2020 Census.

Of the total existing housing units, 76% were single-family units, 6% were two-to-four family units, 4% were multifamily units (five families or more), and 14% were mobile homes. The median age of the housing stock was 61 years, making it older than that in the Commonwealth of Pennsylvania, where the median age of housing was 57 years.

Though home prices increased across the board, data show that the price of housing in the assessment area was once again less expensive than in the Commonwealth overall. According to 2020 Census data, the median housing value in the PA Non-MSA assessment area was \$123,398, which is lower than the median housing value in the Commonwealth of Pennsylvania (\$187,500). Though there were no low-income tracts in the assessment area according to the 2020 Census, data shows a disparity between housing values in moderate-income tracts compared to those in middle- and upper-income tracts. The median housing value in moderate-income tracts was \$89,729, which was significantly lower than median housing values in middle- and upper-income tracts (\$125,624 and \$149,333, respectively). Finally, in the assessment area, just under 40% of the total owner-occupied housing units were valued at less than \$100 thousand, compared to the Commonwealth, where just under 21% of owner-occupied housing units were valued at less than \$100 thousand.

Finally, median gross rent (rent plus utilities) rose, but was once again less expensive in the assessment area than in Pennsylvania. Median gross rent in the PA Non-MSA assessment area was \$712, which was below the median gross rent in Pennsylvania of \$958. Within the PA Non-MSA assessment area, just under 37% of renters spent more than 30% of their income on rent, which is a lower figure than in Pennsylvania as a whole (43%).

Borrower Income Data

2015 ACS Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 46,217 families in the assessment area. Of these families, 19% were designated as low-income, 19% were moderate-income, 22% were middle-income, and 40% were upper-income. According to 2015 ACS data, families living below the poverty level represented 10% of families in the assessment area, which was just higher than the rate of 9% for the Commonwealth of Pennsylvania.

LARGE INSTITUTION PERFORMANCE EVALUATION

NOVEMBER 2024

2020 Census Data

There was little change in the percentage of families of different income levels from the 2015 ACS to the 2020 Census. According to the 2020 Census data, of the 45,717 families in the assessment area, 21% were designated as low-income, 19% were designated as moderate-income, 22% were middle-income, and 38% were upper-income. Families living below the poverty level represented 10% of families in the assessment area, which was slightly higher than the rate of 8% for the Commonwealth of Pennsylvania.

For the purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the United States Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the FFIEC.

Median family incomes for the assessment area are listed in the table below for each of the years covered by the evaluation and are categorized by the dollar amounts recognized as low-, moderate-, middle-, and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2021	\$65,100	Less than \$32,550	\$32,550 - \$52,079	\$52,080 - \$78,119	\$78,120 or more
2022	\$72,900	Less than \$36,450	\$36,450 - \$58,319	\$58,320 - \$87,479	\$87,480 or more
2023	\$77,800	Less than \$38,900	\$38,900 - \$62,239	\$62,240 - \$93,359	\$93,360 or more

Geographic Business Data

2015 ACS Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to 2021 Dun & Bradstreet business demographics, there were 6,517 businesses in the assessment area. Of these businesses, 3% were located in low-income tracts, and 1% were located in moderate-income tracts. The majority of businesses were located in middle-income tracts (89%), while 7% of businesses were located in upper-income tracts. Business demographic data also revealed that of the 6,517 businesses in the assessment area, 89% were small businesses with gross annual revenue of \$1 million or less.

2020 Census Data

According to 2022 Dun & Bradstreet business demographics, there were 6,448 businesses in the assessment area. There were no low-income tracts in the assessment area, according to the 2020 Census data. Nearly 13% of businesses in the assessment area were located in moderate-income tracts, 86% of businesses were located in middle-income tracts, and 1% were located in upper-income tracts. Business demographic data also revealed that of the 6,448 businesses in the assessment area, 89% were small businesses with gross annual revenue of \$1 million or less.

Finally, according to 2023 Dun & Bradstreet business demographics, there were 6,495 businesses in the assessment area. Over 12% of businesses in the assessment area were located in moderate-income tracts,

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

86% of businesses were located in middle-income tracts, and just over 1% were located in upper-income tracts. Of the 6,495 businesses in the assessment area, 89% were small businesses with gross annual revenue of \$1 million or less.

Assessment area demographics used to evaluate C&N's CRA performance in the PA non-MSA assessment area in 2021, 2022, and 2023 are detailed in the tables on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank PA Non-MSA Assessment Area Assessment Area Demographics 2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.2	614	1.3	295	48.0	8,975	19.4
Moderate-income	1	2.2	639	1.4	203	31.8	8,675	18.8
Middle-income	40	88.9	41,413	89.6	3,977	9.6	10,272	22.2
Upper-income	3	6.7	3,551	7.7	225	6.3	18,295	39.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	45	100.0	46,217	100.0	4,700	10.2	46,217	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,645	471	0.9	28.6	1,013	61.6	161	9.8
Moderate-income	1,215	546	1.0	44.9	578	47.6	91	7.5
Middle-income	87,689	46,938	89.9	53.5	15,347	17.5	25,404	29.0
Upper-income	5,646	4,278	8.2	75.8	706	12.5	662	11.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	96,195	52,233	100.0	54.3	17,644	18.3	26,318	27.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	175	2.7	156	2.7	18	3.9	1	0.4
Moderate-income	89	1.4	83	1.4	6	1.3	0	0.0
Middle-income	5,780	88.7	5,137	88.7	398	85.2	245	94.6
Upper-income	473	7.2	415	7.2	45	9.6	13	5.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0
Total Assessment Area	6,517	100.0	5,791	100.0	467	100.0	259	100.0
	Percentage of Total Businesses:			88.9		7.2		4.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	500	95.2	494	95.2	5	100.0	1	100.0
Upper-income	24	4.6	24	4.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	525	100.0	519	100.0	5	100.0	1	100.0
	Percentage of Total Farms:			98.9		1.0		0.2

2015 ACS Data and 2021 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank PA Non-MSA Assessment Area Assessment Area Demographics 2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	9,527	20.8
Moderate-income	6	12.0	4,439	9.7	937	21.1	8,883	19.4
Middle-income	43	86.0	40,430	88.4	3,431	8.5	10,168	22.2
Upper-income	1	2.0	848	1.9	70	8.3	17,139	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	50	100.0	45,717	100.0	4,438	9.7	45,717	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0.0	0.0	0.0	0	0.0	0	0.0
Moderate-income	8,874	4,473	8.6	50.4	3,068	34.6	1,333	15.0
Middle-income	87,429	46,745	89.5	53.5	14,760	16.9	25,924	29.6
Upper-income	1,332	990	1.9	74.3	264	19.8	78	5.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	97,635	52,208	100.0	53.5	18,092	18.5	27,335	28.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	803	12.5	711	12.4	71	15.5	21	8.1
Middle-income	5,552	86.1	4,932	86.1	382	83.6	238	91.5
Upper-income	93	1.4	88	1.5	4	0.9	1	0.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,448	100.0	5,731	100.0	457	100.0	260	100.0
	Percentage of Total Businesses:			88.9		7.1		4.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	18	3.5	18	3.5	0	0.0	0	0.0
Middle-income	492	95.7	486	95.7	5	100.0	1	100.0
Upper-income	4	0.8	4	0.8	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	514	100.0	508	100.0	5	100.0	1	100.0
	Percentage of Total Farms:			98.8		1.0		0.2

2020 Census Data and 2022 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank PA Non-MSA Assessment Area Assessment Area Demographics 2023								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	9,527	20.8
Moderate-income	6	12.0	4,439	9.7	937	21.1	8,883	19.4
Middle-income	43	86.0	40,430	88.4	3,431	8.5	10,168	22.2
Upper-income	1	2.0	848	1.9	70	8.3	17,139	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	50	100.0	45,717	100.0	4,438	9.7	45,717	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	8,874	4,473	8.6	50.4	3,068	34.6	1,333	15.0
Middle-income	87,429	46,745	89.5	53.5	14,760	16.9	25,924	29.6
Upper-income	1,332	990	1.9	74.3	264	19.8	78	5.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	97,635	52,208	100.0	53.5	18,092	18.5	27,335	28.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	803	12.4	713	12.3	68	15.0	22	8.5
Middle-income	5,599	86.2	4,981	86.1	381	84.1	237	91.2
Upper-income	93	1.4	88	1.6	4	0.9	1	0.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,495	100.0	5,782	100.0	453	100.0	260	100.0
	Percentage of Total Businesses:			89.0		7.0		4.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	19	3.6	19	3.7	0	0.0	0	0.0
Middle-income	499	95.4	493	95.3	5	100.0	1	100.0
Upper-income	5	1.0	5	1.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	523	100.0	517	100.0	5	100.0	1	100.0
	Percentage of Total Farms:			98.9		1.0		0.2

2020 Census Data and 2023 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers and businesses of different sizes, including small businesses ;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

C&N's lending levels in the PA Non-MSA assessment area reflect good responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the PA Non-MSA assessment area represented 64% of the bank's overall lending by number of loans, and 46% by dollar amount. During the evaluation period, C&N made 1,925 HMDA loans totaling nearly \$250.6 million, 821 small business loans totaling \$67.6 million, and 80 small farm loans totaling \$2 million in the PA Non-MSA assessment area.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, adequate penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending performance due to the very few low- and moderate-income geographies present in the assessment area. Further, due to loan volumes, HMDA loans were given the most weight in determining the bank's overall borrower distribution of loans, followed by small business loans.

Home-Mortgage Lending

C&N's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is adequate.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 19% of assessment area families were designated as low-income, 19% were moderate-income, 22% were middle-income, and 40% were upper-income. Similarly, according to the 2020 Census data, 21% of assessment area families were designated as low-income, 19% were moderate-income, 22% were middle-income, and 38% were upper-income.

According to available data, 38% of families according to the 2015 ACS data, and 40% according to 2020 Census data, were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

The following tables compare C&N's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate lending in 2021, relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data. The remaining tables, used to evaluate 2022 and 2023 lending, rely on 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data.

Citizens & Northern Bank PA Non-MSA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	19.4	5.6	6.4
Moderate	18.8	15.7	17.2
Middle	22.2	24.8	21.7
Upper	39.6	49.4	38.9
Unknown	0.0	4.5	15.8
Total	100.0	100.0	100.0

Citizens & Northern Bank PA Non-MSA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	20.8	6.6	8.0
Moderate	19.4	18.1	21.9
Middle	22.2	24.6	24.5
Upper	37.6	46.2	35.7
Unknown	0.0	4.5	9.9
Total	100.0	100.0	100.0

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank PA Non-MSA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2020 Census Data)	Aggregate Comparison	
		2023	
		% C&N Lending	% Aggregate Lending
Low	20.8	8.0	8.3
Moderate	19.4	21.5	22.6
Middle	22.2	22.2	23.1
Upper	37.6	44.0	35.7
Unknown	0.0	4.3	10.3
Total	100.0	100.0	100.0

Lending to Low-Income Borrowers

Overall, C&N's lending to low-income borrowers was adequate.

2015 ACS Data

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a downpayment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

C&N's lending in 2021 to low-income borrowers was adequate. In 2021, just under 6% of the bank's HMDA loans (40 loans) were to low-income borrowers in the assessment area, which was comparable to the aggregate lending level of just over 6%, but below the proxy of 19% of low-income families in the assessment area. By product type, C&N originated 7% of its home purchase loans, 4% of its refinance loans, 5% of its home improvement loans, 8% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to low-income borrowers. In comparison, 2021 aggregate lending data shows that 8% of home purchase loans, 5% of refinance loans, 7% of home improvement loans, 10% of other purpose lines of credit, 6% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" were made to low-income borrowers.

2020 Census Data

C&N's lending in 2022 to low-income borrowers was adequate. In 2022, nearly 7% of the bank's HMDA loans (43 loans) were to low-income borrowers in the assessment area, which was below the aggregate lending level of 8% and the proxy of 21%. By product type, C&N originated 5% of its home purchase loans, 11% of its refinance loans, 9% of its home improvement loans, 2% of its other purpose lines of credit, 9% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" to low-income borrowers. In comparison, 2022 aggregate lending data shows that 7% of home purchase loans, 12% of refinance loans, 8% of home improvement loans, 5% of other purpose lines of credit, 8% of other purpose closed/exempt loans, and no multifamily loans or loans with purpose "not applicable" were made to low-income borrowers.

C&N's lending in 2023 to low-income borrowers was adequate. In 2023, 8% of the bank's HMDA loans (45 loans) were to low-income borrowers in the assessment area, which was comparable to the aggregate lending level of 8%, but below the proxy of 21. By product type, C&N originated 6% of its home purchase loans, 16% of its refinance loans, 10% of its home improvement loans, 6% of its other purpose lines of credit, 9% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" to low-income borrowers. In comparison, 2023 aggregate lending data shows that 7% of home purchase loans, 11% of refinance loans, 11% of home improvement loans, 7% of other purpose lines of credit, 12% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" were made to low-income borrowers.

Lending to Moderate-Income Borrowers

For the period under review, the bank's lending to moderate-income borrowers was adequate.

2015 ACS Data

C&N's lending in 2021 to moderate-income borrowers was adequate. In 2021, 16% of the bank's HMDA loans (112 loans) were to moderate-income borrowers in the assessment area, which trailed closely behind both the aggregate lending level of 17%, and the proxy of 19% of moderate-income families in the assessment area. By product type, C&N originated 16% of its home purchase loans, 16% of its refinance loans, 18% of its home improvement loans, 12% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, 2021 aggregate lending data shows that 20% of home purchase loans, 15% of refinance loans, 17% of home improvement loans, 23% of other purpose lines of credit, 17% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" were made to moderate-income borrowers.

2020 Census Data

C&N's lending in 2022 to moderate-income borrowers was adequate. In 2022, 18% of the bank's HMDA loans (117 loans) were to moderate-income borrowers in the assessment area, which was below both the aggregate lending level of 22%, and the proxy of 19%. By product type, C&N originated 18% of its home purchase loans, 18% of its refinance loans, 14% of its home improvement loans, 21% of other purpose lines of credit, 21% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, 2022 aggregate lending data shows that 23% of home purchase loans, 21% of refinance loans, 19% of home improvement loans, 22% of other purpose lines of credit, 23% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" were made to moderate-income borrowers.

Finally, C&N's lending in 2023 to moderate-income borrowers was good. In 2023, 22% of the bank's HMDA loans (121 loans) were to moderate-income borrowers in the assessment area. This performance was just below the aggregate lending level of 23%, but above the proxy of 19%. By product type, C&N originated 21% of its home purchase loans, 26% of its refinance loans, 26% of

its home improvement loans, 17% of multifamily loans, 18% of other purpose lines of credit, 21% of other purpose closed/exempt loans, and no loans with purpose “not applicable” to moderate-income borrowers.

In comparison, 2023 aggregate lending data shows that 23% of home purchase loans, 28% of refinance loans, 21% of home improvement loans, 6% of multifamily loans, 21% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and no loans with purpose “not applicable” were made to moderate-income borrowers.

Small Business Lending

An analysis of C&N’s borrower distribution of small business loans reflects good penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenue of \$1 million or less, namely small businesses.

The number of businesses operating in the bank’s PA Non-MSA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to available Dun & Bradstreet business demographic data, in 2021 there were 6,517 businesses in the assessment area, with 5,791 (89%) designated as small businesses. In 2022, there were 6,448 businesses in the assessment area, 5,731 (89%) of which were small businesses. Finally, in 2023, there were 6,495 businesses in the assessment area, 5,782 (89%) of which were small businesses.

2015 ACS Data

In 2021, the bank’s borrower distribution of small business loans was good. In 2021, C&N originated 483 small business loans within the assessment area, aggregating \$33.5 million. Of these loans, 70% were originated to small businesses. This performance was above the aggregate lending level of 53% to small businesses, but below the proxy of 89%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2021, 83% of C&N’s small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 88% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

2020 Census Data

The bank’s borrower distribution of small business loans in 2022 was good. In 2022, C&N originated 186 small business loans within the assessment area, aggregating \$20.9 million. Of these loans, 58% were originated to small businesses. This performance was in-line with the aggregate lending level of 57% to small businesses, but below the proxy of 89%. In 2022, 70% of C&N’s small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 91% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

The bank's borrower distribution of small business loans in 2023 was good. In 2023, C&N originated 152 small business loans within the assessment area, aggregating \$13.2 million. Of this total, which 59% were originated to small businesses. This performance was in-line with the aggregate lending level of 58% to small businesses, but below the proxy of 89%. In 2023, 78% of C&N's small business loans were extended in amounts of \$100 thousand or less.

Aggregate data indicates that 92% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Geographic Distribution of Loans

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects adequate penetration throughout the PA Non-MSA assessment area, including low- and moderate-income tracts. Once again, it is noted that HMDA loans were given greater weight in determining this conclusion, given their higher volume by number and dollar amount, followed by small business loans. Further, due to the demographics of the assessment area, more weight was given to lending in moderate-income geographies.

Home-Mortgage Lending

C&N's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts, is adequate. The percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, 1% of owner-occupied housing was located in low-income tracts, and 1.0% was located in moderate-income tracts. The majority of owner-occupied housing (90%) was located in middle-income census tracts, and just under 2% was located in upper-income tracts.

According to 2020 Census data, there were no low-income tracts in the assessment area, while nearly 9% of owner-occupied housing was located in moderate-income tracts. Once again, the majority of owner-occupied housing, almost 90%, was located in middle-income census tracts, and just under 2% was located in upper-income tracts.

The following tables present C&N's geographic distribution of HMDA loans from 2021 through 2023, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The first table, used for lending in 2021, relies on 2015 ACS data, along with updated HMDA data, and both the second and third tables use 2020 Census data, along with updated HMDA data.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank PA Non-MSA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	0.9	0.0	0.4
Moderate	1.0	0.0	0.7
Middle	89.9	93.7	91.2
Upper	8.2	6.3	7.7
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Citizens & Northern Bank PA Non-MSA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	8.6	7.1	9.4
Middle	89.5	90.3	89.0
Upper	1.9	2.6	1.6
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Citizens & Northern Bank PA Non-MSA, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison	
		2023	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	8.6	5.5	8.6
Middle	89.5	92.0	89.5
Upper	1.9	2.5	1.9
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

C&N's overall HMDA lending in low-income tracts was poor, though very little weight was given to lending in low-income tracts, given the demographics of the assessment area. More specifically, it is noted that there were few opportunities to lend in low-income geographies. According to 2015 ACS Data, there was only one low-income tract in the assessment area, and there were no low-income tracts according to the 2020 Census.

2015 ACS Data

C&N's HMDA lending in low-income census tracts in 2021 was poor. The bank originated no HMDA loans in the single low-income census tract in 2021. The bank's performance was similar to the proxy of 1%, and the aggregate lending level of less than 1%.

2020 Census Data

There were no low-income census tracts in the PA Non-MSA assessment area using 2020 Census data, and therefore, geographic distribution analysis was not performed in 2022, or 2023.

Lending in Moderate-Income Census Tracts

C&N's overall HMDA lending in moderate-income tracts was adequate. It is noted that, according to the 2015 ACS, there was one moderate-income tract in the assessment area. The number of moderate-income census tracts in the assessment area increased to six, according to the 2020 Census.

2015 ACS Data

C&N's lending in moderate-income tracts in 2021 was poor. The bank originated no HMDA loans in the single moderate-income census tract in 2021, compared to the proxy of 1%, and the aggregate level of lending of less than 1%.

2020 Census Data

The bank's lending in moderate-income census tracts in 2022 was adequate. In 2022, C&N's HMDA lending in moderate-income tracts was 7% (46 loans), which measured below both the proxy of 9% of owner-occupied housing in moderate-income tracts, and aggregate performance of 9%. Categorized by loan product type, C&N made 8% of its home purchase loans, 3% of its refinance loans, 6% of its home improvement loans, 9% of its other purpose line of credit, 12% of its other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" in moderate-income tracts in 2022. Aggregate lending data shows that 12% of home purchase loans, 6% of refinance loans, 7% of home improvement loans, 23% of multifamily loans, 8% of other purpose line of credit, 7% of other purpose closed/exempt loans, and 12% of loans with purpose "not applicable" were made in moderate-income census tracts in the assessment area in 2022.

Finally, the bank's lending in moderate-income census tracts in 2023 was adequate. In 2023, C&N's HMDA lending in moderate-income tracts was just under 6% (31 loans), which measured below both the proxy of 9% of owner-occupied housing in moderate-income tracts, and aggregate performance of 9%. Categorized by loan product type, C&N made 6% of its home purchase loans, 7% of its refinance loans, 6% of its home improvement loans, 17% of its multifamily loans, 3% of its other purpose line of credit, 5% of its other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2023. Aggregate lending data shows that 10% of home purchase loans, 7% of refinance loans, 6% of home improvement loans, 33% of multifamily

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

loans, 5% of other purpose line of credit, 5% of other purpose closed/exempt loans, and 7% of loans with purpose “not applicable” were made in moderate-income census tracts in the assessment area in 2023.

Small Business Lending

The geographic distribution of C&N’s small business lending reflects poor penetration throughout the assessment area, in the context of the assessment area’s demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract.

Based on available business data in 2021, 3% of the assessment area’s businesses were located in low-income tracts, and just over 1% were located in moderate-income tracts. The majority of businesses were located in middle-income tracts, 89%, while 7% of businesses were located in upper-income tracts.

In 2022, there were no low-income tracts located in the assessment area, therefore no businesses operated in such geographies. Of the businesses located in the assessment area, 13% were located in moderate-income tracts, 86% were located in middle-income tracts, and 1% were located in upper-income tracts. Similarly, in 2023 there were no low-income tracts in the assessment area. Of the businesses located in the assessment area, 12% were located in moderate-income tracts, 86% were located in middle-income tracts, and just under 2% were located in upper-income tracts.

The tables below present C&N’s small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

Citizens & Northern Bank PA Non-MSA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	2.7	0.0	1.9
Moderate	1.4	0.0	0.8
Middle	88.7	96.5	89.0
Upper	7.2	3.5	7.8
Tract Unknown	0.0	0.0	0.5
Total	100.0	100.0	100.0

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank PA Non-MSA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	12.5	2.2	5.9
Middle	86.1	97.3	91.8
Upper	1.4	0.5	1.5
Tract Unknown	0.0	0.0	0.8
Total	100.0	100.0	100.0

Citizens & Northern Bank PA Non-MSA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2020 Census Data)	Aggregate Comparison	
		2023	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	12.4	3.9	6.3
Middle	86.2	95.4	91.0
Upper	1.4	0.7	1.8
Tract Unknown	0.0	0.0	0.9
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

C&N's overall CRA small business lending in low-income tracts was poor, though very little weight was given to lending in low-income tracts, given the demographics of the assessment area. More specifically, it is noted that there were few opportunities to lend in low-income geographies. According to 2015 ACS data, there was only one low-income tract in the assessment area, and there were no low-income tracts according to 2020 Census data.

2015 ACS Data

C&N's small business lending in low-income census tracts in 2021 was poor. The bank originated no small business loans in the single low-income census tract in 2021, compared to the proxy of 3% and the aggregate lending level of 2%.

2020 Census Data

There were no low-income census tracts in the PA Non-MSA assessment area using 2020 Census data, and therefore geographic distribution analysis was not performed in 2022, or 2023.

Lending in Moderate-Income Census Tracts

C&N's small business lending in moderate-income tracts was poor.

2015 ACS Data

In 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. C&N originated no small business loans in the assessment area's moderate-income census tract. The bank's lending level was below both the applicable loan demand proxy, and the 2021 aggregate small business lending level, both of which were around 1%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. C&N originated 2% of its small business loans (four loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable loan demand proxy of 13%, and the 2022 aggregate small business lending level of 6%.

Finally, in 2023, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. C&N originated 4% of its small business loans (six loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable loan demand proxy of 12%, and the 2023 aggregate small business lending level of 6%.

Responsiveness to Credit Needs

C&N exhibits an adequate record of servicing the credit needs of low- and moderate-income individuals and areas and very small businesses, consistent with safe and sound banking practices. As mentioned previously, the primary community development needs mentioned by community contact were affordable housing and financing for small businesses in the assessment area.

In addition to responsiveness through its retail HMDA and small business lending, C&N addressed these needs through the use of flexible lending programs, as discussed in more detail below.

Innovative and/or Flexible Lending Practices

C&N makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the PA Non-MSA assessment area. Through a number of different programs, the bank has made home-mortgage loans to low- and moderate-income borrowers, and small business loans, during the evaluation period.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. In an effort to address the needs of such borrowers in the PA Non-MSA assessment area, C&N offers two flexible mortgage products developed in-house. More specifically, the bank offers a proprietary First-Time Homebuyer Program, with mortgage features including as little as 3% down, seller's assistance up to 3%, a free homeowner education program, free consultations with bank staff, and no monthly PMI payments.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

The bank also offers an Emergency Loan Relief Program for borrowers affected by unexpected natural disasters. During the evaluation period, the bank made 11 First-Time Homebuyer loans totaling nearly \$1.7 million, and 10 Emergency Relief Loans totaling \$395 thousand.

Additionally, C&N offers a variety of first-time homebuyer products through government agencies including the FHA, USDA, VA, Fannie Mae, and others. During the evaluation timeframe, the following loans were made in the PA Non-MSA assessment area: 18 FHA loans totaling \$3.3 million; three USDA loans totaling \$545 thousand; four VA loans totaling nearly \$868 thousand; 22 Fannie Mae HomeReady loans totaling \$2.3 million; three FHLB of Pittsburgh Housing Impact Mortgage Partnership loans totaling \$300 thousand; and two PHFA loans totaling \$169 thousand. Further, a total of seven FHLB of Pittsburgh First Front Door grants totaling \$92 thousand were made to match borrowers' contributions for downpayment and closing costs.

Similarly, the credit needs of small businesses can often be addressed more effectively through alternative products. In an effort to address the credit needs of small businesses in its assessment area, C&N participates in SBA and FSA loan programs. The bank made three SBA loans totaling \$567 thousand, one SBA 504 loan totaling over \$2 million, and one FSA loan totaling \$180 thousand.

Community Development Lending

C&N made a relatively high level of community development loans in the assessment area.

During the period evaluated, which includes the timeframe between February 1, 2022 through November 4, 2024, the bank made 16 qualified community development loans in the assessment area, totaling \$6.9 million. C&N's community development lending showed an increase from the previous examination when the bank made 15 community development loans totaling \$5.4 million.

Of the bank's 16 community development loans, 13 loans totaling \$5.8 million (85%) supported revitalization and stabilization efforts in the assessment area. Additionally, three loans totaling \$1 million (15%) supported community services in the assessment area.

The following table includes the bank's community development loans, broken out by community development purpose.

Citizens & Northern Bank PA Non-MSA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2022	0	0	0	0	0	0	1	225	1	225
2023	0	0	1	500	0	0	5	2,498	6	2,998
2024	0	0	2	525	0	0	7	3,120	9	3,645
TOTAL	0	0	3	1,025	0	0	13	5,843	16	6,868

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Volume of Investment and Grant Activity

C&N made a significant level of qualified community development investments and grants, occasionally in a leadership position. The bank made 76 qualified investments, grants, and donations in the PA Non-MSA assessment area totaling over \$6.4 million, which is an increase from the previous CRA evaluation when the bank made 47 investments totaling \$3.9 million in the assessment area.

The majority of qualified investments supported community services in the assessment area. The bank made eight qualified investments totaling \$3.5 million (59%) to support community services in the PA Non-MSA assessment area. The bank also made 10 investments totaling almost \$2.5 million (41%) to support affordable housing for low- and moderate-income borrowers or geographies. All of the investments supporting affordable housing were made through mortgage-backed securities. Four of the ten mortgage-backed securities were recognized in the previous CRA evaluation, and remained outstanding, and the remaining six investments were initiated during the current evaluation period.

In addition to the qualified investments discussed above, the bank also made 58 donations totaling \$428.1 thousand to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, \$2 thousand (less than 1%) supported affordable housing, \$2.5 thousand (less than 1%) supported economic development, \$142.6 thousand (33%) supported revitalization and stabilization efforts, and \$281 thousand (66%) supported community services.

The following table presents the investment and grant activity for the PA Non-MSA assessment area:

Citizens & Northern Bank PA Non-MSA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	10	2,453	8	3,547	0	0	0	0	18	6,000
Donations	3	2	38	281	2	3	15	142	58	428
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	13	2,455	46	3,828	2	3	15	142	76	6,428

Responsiveness to Credit and Community Development Needs

C&N exhibits good responsiveness to credit and community development needs of the assessment area. As mentioned previously, the level of qualified investments and grants increased notably since the prior evaluation, growing by over 60%. Further, as noted in the table above, a meaningful portion of the bank's qualified investments and donations by dollar amount (38%) supported affordable housing in the assessment area, a pronounced community need as indicated through community development interviews. Many of the bank's community services investments were Educational Improvement Tax Credit (EITC) contributions in support of school districts in the assessment area with over half of the student body qualifying for free or reduced lunches.

Community Development Initiatives

C&N makes occasional use of innovative and/or complex investments to support community development initiatives. In the PA Non-MSA assessment area, the bank invested in mortgage-backed securities to support home ownership for low- and moderate-income borrowers or geographies in the assessment area. The bank also invested in bonds and EITCs to support school districts with over half of students qualifying for free and/or reduced lunch in the assessment area. These investment types are more complex than simple donations.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms.
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. During the review period, C&N operated 16 full-service branches in the PA Non-MSA assessment area (59% of all branches)⁷. Using 2015 ACS data, 17 of the bank's 18 branches were located in middle-income census tracts (94%), and one was located in an upper-income tract (6%). Census tract income levels changed with the updated 2020 Census, and as a result, the income levels of branches also changed. More specifically, using 2020 Census data, three branches were located in moderate-income tracts (19%), and 13 branches (81%) were located in middle-income tracts.

⁷ Additional branches, one located in a middle-income tract in Monroeton and one located in a middle-income tract in Port Allegany, operated in the assessment area for a portion of the evaluation timeframe, before closing in November 2022 and September, 2024 respectively.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

The following tables detail the locations of the bank's branches with comparison to 2015 and 2020 Census population demographics. Both tables indicate that the bank's branches are located in areas where the majority of the assessment area population is concentrated.

Citizens & Northern Bank PA Non-MSA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent of Population
Low	0	0.0	3,176	1.8
Moderate	0	0.0	2,725	1.6
Middle	17	94.4	157,692	89.6
Upper	1	5.6	12,430	7.0
Unknown Income	0	0.0	0	0.0
Totals	18	100.0	176,023	100.0

Citizens & Northern Bank PA Non-MSA Assessment Area Retail Branch Distribution 2020 Census				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent of Population
Low	0	0.0	0	0.0
Moderate	3	17.6	16,583	9.9
Middle	13	82.4	148,320	88.1
Upper	0	0.0	3,324	2.0
Unknown Income	0	0.0	0	0.0
Totals	16	100.0	168,227	100.0

ATMs are available at all branch locations in the PA Non-MSA assessment area, which provides electronic access to banking services. To supplement traditional banking services, C&N provides alternative delivery systems through its full-service website. Customers are able to pay bills, view and print statements, collect recurring customer payments, transfer money between accounts, reorder checks, deposit payroll, and apply for loans using the bank's online website at cnbankpa.com.

Changes in Branch Locations

C&N's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals.

During the evaluation period, two branches were closed. As stated above, the bank closed its Monroeton branch on November 4, 2022, and its Port Allegany branch on September 6, 2024. Both branches were located in middle-income census tracts.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned previously, all branches in the PA Non-MSA assessment area have ATMs. Additionally, of the 16 branches in the

assessment area, 13 (81%) have drive through facilities.⁸ All of the full-service branches within the assessment area operate Monday through Friday. All but five branches offer limited Saturday hours.⁹

Bank Products

C&N offers products that provide greater access to banking services for low- and moderate-income customers, including C&N Everyday Checking Account Basic Checking, a free checking account for consumers, which features no minimum monthly balance requirements, no monthly maintenance charges, and no per-check charges.

Additionally, the bank offers a Simple Debit Account, which is a certified Bank-On account targeted to unbanked and underbanked individuals, and serves as a second chance account for customers who may not qualify for a traditional account due to a past charge-off. The Simple Debit account has a \$5 service charge per month, offers free printed and electronic statements, free online bill payment, and contains no nonsufficient funds, uncollected funds, or overdraft fees.

The bank also offers products to serve the needs of businesses of different sizes. The bank's Super B Checking Account is a basic checking account that is ideal for small businesses with limited transaction activity. For businesses with a desire to earn interest, the bank offers a Business Interest Checking Account, though this requires the business to maintain a balance of \$1,000 or greater each month. Both business accounts offer 250 free transaction items processed through the account, with transactions above the monthly maximum incurring a \$.25 per item charge. This account allows very small businesses access to banking services that meet their needs.

Community Development Services

C&N provides an adequate level of community development services in the assessment area.

Over the evaluation period, bank officers and employees provided qualified community development services, serving in various capacities on boards and committees, and providing technical assistance to community and economic development organizations. Some notable examples included:

- An employee serves as the president and chairman of The Fund for Northern Tier Development, an organization that prioritizes economic development, a comprehensive and well-trained workforce, and an educational system that is adapting and supplying to present and future demands.
- An employee serves as the treasurer, board member, and loan committee member for Develop Tioga, an organization that promotes business opportunities and provide access to business resources for new entrepreneurs.

⁸ Drive-through facilities are not available at the Elkland (middle-income), Laporte (middle-income), and Liberty (middle-income) branches due to limitations in the physical locations.

⁹ Saturday hours are not offered at the Athens (middle-income), East Smithfield (middle-income), Elkland (middle-income), Laporte (middle-income), and Towanda (Towanda-income) branches.

- An employee serves as a board member and loan committee member for the Northern Tier Regional Planning & Development Commission, an organization that tracks and makes available economic information about the region, as well as connecting entities with grant opportunities for community, economic, and sustainable development projects.

Additionally, the bank sponsored 40 informational seminars in low- and moderate-income geographies within the assessment area, covering topics like purchasing a home, starting a business, along with general financial literacy presentations to schools where over half of students qualify for free or reduced lunch in the assessment area.

Finally, the bank participated as an intermediary for the FHLB Pittsburgh's "Home4Good Initiative." Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to the FHLB of Pittsburgh, on their behalf. The bank's efforts brought in \$604 thousand in Home4Good funding into the assessment area.

PHILADELPHIA, PA ASSESSMENT AREA

FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of the Assessment Area

C&N's Philadelphia, PA assessment area consists of the Montgomery-Bucks-Chester, PA MD, which includes Montgomery, Bucks, and Chester Counties in Pennsylvania, and the Philadelphia, PA MD, which consists of Delaware and Philadelphia Counties, also in Pennsylvania. These two MDs are two of four MDs that comprise the larger Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA. The assessment area is situated in southeastern Pennsylvania, and had a population of just under 4.1 million according to the 2015 ACS and over 4.2 million as of the 2020 Census.

For the purposes of assessing C&N's CRA performance in the Commonwealth of Pennsylvania, and overall, the Philadelphia, PA assessment area was given the second highest weight. Of the bank's total loans, 20% by number, and 40% by dollar volume were originated in the Philadelphia, PA assessment area. Further, of the bank's assessment areas, the Philadelphia, PA assessment area had the second highest volume of deposits, accounting for 20% of the bank's total deposits (\$414.9 million). Additionally, 11% of the bank's 27 branches (three branches) were located in the assessment area.

C&N's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Philadelphia, PA assessment area contained 998 census tracts. Seventy-two tracts (7%) were designated as low-income, 252 (25%) as moderate-income, 330 (33%) as middle-income, 327 (33%) as upper-income, and 17 (2%) were designated as unknown-income tracts. According to 2020 Census data, the Philadelphia, PA assessment area contained 1,050 census tracts. Seventy-one tracts (7%) were designated as low-income, 245 (23%) as moderate-income, 339 (32%) as middle-income, 352 (34%) as upper-income, and 43 (4%) were designated as unknown-income.

The low- and moderate-income census tracts were mainly concentrated within the northern and western portions of the city of Philadelphia, southeastern Bucks County, the city of Chester in Chester County, the borough of Pottstown in the western portion of Montgomery County along the northern border of Chester County, and the borough of Norristown in Montgomery County. The tracts of unknown-income were mainly located in areas containing the Philadelphia International Airport, the Northeast Philadelphia Airport, Fairmount Park, and the Philadelphia Navy Yard.

Maps of the assessment area at the time of the 2015 ACS, and 2020 Census are available in Appendix F.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

According to the FDIC's Deposit Market Share Report, as of June 30, 2024, there were 92 depository institutions operating in the bank's Philadelphia, PA assessment area. These institutions maintained a total of 1,400 branches, holding \$611.1 billion in deposits. C&N, with three branches, ranked fortieth, with \$414.9 million, or less than 1% of the deposit market. Capital One, N.A. ranked first with one branch holding \$252.7 billion (41%) of the deposit market, followed by TD Bank, N.A. with 127 branches holding \$95.9 billion (16%) of the deposit market. Wells Fargo Bank, N.A. ranked third, with 142 branches and \$33.8 billion (nearly 6%) of the deposit market.

C&N reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2021, a total of 827 institutions reported 212,174 HMDA loan originations and purchases within the assessment area. C&N tied for one hundred and ninety-sixth in the HMDA market with less than 1% of total originations and purchases. Rocket Mortgage, LLC ranked first in the HMDA market with 6% market share, followed by Wells Fargo Bank, N.A. with the same percentage of the HMDA market, and Citizens Bank, N.A. with 5% market share.

The 2022 aggregate HMDA data showed a marked decrease in overall HMDA lending, with 786 lenders originating and purchasing 125,569 home-mortgage loans in the assessment area. C&N tied for one hundred and twenty-ninth in the HMDA market with less than 1% of total originations and purchases. Citizens Bank, N.A. led the HMDA market with 7% of the market, followed by Wells Fargo Bank, N.A. with over 4% of the market, and Police & Fire Credit Union with 4% market share.

Once again, the 2023 aggregate HMDA data showed a decrease in overall HMDA lending from the previous year, with 717 lenders originating 84,216 home-mortgage loans in the assessment area. C&N tied for one hundred and twenty-seventh in the HMDA market with less than 1% of total originations and purchases. Citizens Bank, N.A. ranked first in the HMDA market with 6% of the market, followed by Police & Fire Credit Union with 5% of the market, and PennyMac Loan Services, LLC with 4% of the market.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all small business and small farm lenders operating in the assessment area. This data is also reported annually. According to 2021 small business and small farm data, there were 271 CRA reporters in the assessment area, originating or purchasing a total of 126,065 small business and small farm loans. C&N ranked thirty-seventh with less than 1% of the market. American Express, N.B. ranked first with 20% of all small business and small farm originations and purchases, followed by JP Morgan Chase Bank, N.A. with nearly 8% of the market's total small business and small farm loan originations and purchases, and Wells Fargo Bank, N.A. with 6% of the CRA market.

According to 2022 small business and small farm data, there were 210 CRA reporters in the assessment area, originating or purchasing a total of 112,251 small business and small farm loans. C&N ranked fifty-second with less than 1% of the market. American Express, N.B. ranked first with 28% of the market, followed by JP Morgan Chase Bank, N.A. with 12% of the market's total small business and small farm loan originations and purchases, and Capital One, N.A. with 7% of the CRA market.

Finally, according to 2023 small business and small farm data, there were 201 CRA reporters in the assessment area, originating or purchasing a total of 103,984 small business and small farm loans. C&N ranked fifty-first with less than 1% of the market. American Express, N.B. once again ranked first with 29% of the market, followed by JP Morgan Chase Bank, N.A. with 16% of the market's total small business and small farm loan originations and purchases, and Bank of America, N.A. with nearly 7% of the CRA market.

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top CRA reporters in the Philadelphia, PA assessment area are national credit card originators. This was the case in all three years evaluated. For instance, in 2023, American Express, N.B., JP Morgan Chase Bank, N.A., Bank of America, N.A, Citibank, N.A., and Capital One, N.A. were the top five small business and small farm reporters, collectively holding 65% of the market in this assessment area.

To supplement economic, demographic, and performance data, interviews were conducted with local community organizations, which provided perspective on credit and community development needs of the Philadelphia, PA assessment area. One interview was held with a housing organization, and the other was with a community action agency who provides community services in the area.

Contacts indicated a need for affordable housing. Since the COVID-19 Pandemic, many residents in the assessment area have struggled with the cost of rent and affordable housing. Further, specialized credit products for low- and moderate-income individuals is crucial, as many with past credit problems (credit scores, credit history, or elevated debt-to-income ratios) may not qualify for traditional mortgage products. Additionally, financial institutions could meet a community need by working with community groups to provide financial literacy lessons, according to one community contact. Finally, community services targeted to low- and moderate-income individuals are helpful, as many residents struggle with high and increasing food and living costs.

Economic Characteristics

The bank's Philadelphia, PA assessment area is located in the Delaware Valley region of southeastern Pennsylvania, within the larger Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA. Philadelphia is the largest city in Pennsylvania, and the sixth largest city in the nation, with a population of 1.6 million according to the 2020 Census.

According to the Moody's Analytics May 2024 Precis Report for the entire Philadelphia MSA, the city's economy is in late expansion mode, and is forecasted to slow in coming months. Downtown investment has bolstered long-run job growth by attracting more firms to the city of Philadelphia, and revamped mixed-use buildings draw more hybrid workers into Center City. However, the financial situations of schools in the area are deteriorating and forcing job cuts, and remote work, leading to an exodus of professional workers, has weakened new business formation.

According to Moody's, Philadelphia's strengths of the MSA include world-class educational institutions, its role as a center for healthcare and medical research, and a well-developed port and

international airport. On the other hand, weaknesses exhibited in the area include relatively anemic population growth, prohibitive business taxes that push firms outside of the city, to suburbs and nearby states, and significant fiscal problems.

The education and health services industry represents the largest employment sector in the Philadelphia, PA MSA, contributing 32% of jobs. Other significant industries include professional and business services (15%), government (13%), and leisure and hospitality services (10%).

According to Moody's, top employers in the MSA include the University of Pennsylvania Health System, Thomas Jefferson University and TJU Health System, Inc., the Children's Hospital of Philadelphia, Comcast, and Drexel University.

Brief descriptions of each county in the bank's Philadelphia, PA assessment area follow.

Montgomery County

Montgomery County is located adjacent to and northwest of the city and county of Philadelphia, and is located between Bucks and Chester counties, to the northeast and southwest, respectively. Montgomery County is geographically diverse, ranging from farms and open land in the extreme north of the county, to densely populated suburban neighborhoods in the southern and central portions of the county. The county seat and largest city in the county is Norristown.

As of the 2020 Census, Montgomery County had a population of 856,553 residents, making it the second most populous county in the assessment area after Philadelphia County. The median family income in the county was \$116,171 as of the 2020 Census, making it the second highest in the assessment area after Chester County. Montgomery County is a suburb of Philadelphia, and as such, is a major employment center. The county is home to several large business parks in Blue Bell, Lansdale, Fort Washington, Horsham, and King of Prussia, which attract thousands of workers from all over the region.

The Pennsylvania Department of Labor and Industry reports that leading employers (excluding state government) in the county include Merck Sharp & Dohme Corporation, Abington Memorial Hospital, Main Line Hospitals Inc., and SEI Investments Company. Montgomery County is also home to a number of colleges and universities, including Arcadia University, Bryn Mawr College, Haverford College, Gwynedd Mercy University, Montgomery County Community College and Pennsylvania State University-Abington Campus.

Bucks County

Bucks County had a population of 646,538 residents as of the 2020 Census, making it the third most populous county in the assessment area. The county shares borders with Montgomery County to the southeast, the state of New Jersey to the east (across the Delaware River), and Northampton and Lehigh Counties in the Lehigh Valley to the north. The median family income in Bucks County is \$111,488, making it the third highest in the assessment area. The county seat is Doylestown.

Tourism is an important asset to Bucks County's economy. Given its proximity to the Delaware River, Bucks County boasts natural scenery, farmland, colonial history, and proximity to major urban areas, including Philadelphia, New York City, Allentown, and Reading, which all draw visitors.

The county is also home to popular destinations that send visitors flocking to shopping and leisure destinations such as farmers markets, Peddler's Village, Doylestown, New Hope, and Sesame Place.

According to the Pennsylvania Department of Labor and Industry, leading employers include Giant Food Stores LLC, Central Bucks School District, Bucks County, and Doylestown Hospital. Bucks County is home to Bucks County Community College, Delaware Valley University and La Salle University – Bucks County Center.

Chester County

Chester County is adjacent to Montgomery County to the northeast, Delaware County to the east, and New Castle County, Delaware, and Cecil County, Maryland to the southeast and southwest, respectively.

Chester County had a population of 534,413 according to 2020 Census data, making it the least densely populated county in the assessment area. That said, Chester County is the wealthiest of the counties in the Philadelphia, PA assessment area, with a median family income of \$126,738.

Eastern Chester County is home to many communities that comprise part of the affluent "Main Line" western suburbs outside of Philadelphia, while part of its southernmost portion is considered suburban Wilmington, along with southwest Delaware County. The county seat is the borough of West Chester. Chester County has seen large waves of development, however agriculture is still a major part of the county's economy. Mushroom growing is a specialty in the southern portion of the county, and the number of horse farms is also increasing.

According to the Pennsylvania Department of Labor and Industry, leading employers include The Vanguard Group Inc., The Chester County Hospital, the County of Chester, and Main Line Hospitals Inc. Chester County is home to Cheyney University of Pennsylvania, Lincoln University, West Chester University of Pennsylvania, and Immaculata University.

Philadelphia County

Philadelphia County is the smallest of the counties in the assessment area by size, though it is the largest by population, with over 1.6 million residents according to the 2020 Census. Philadelphia County is located along the lower Delaware and Schuylkill Rivers, and the county seat is the city of Philadelphia. Philadelphia county's median family income measured \$58,090, which was by far the lowest median family income in the assessment area.

According to the Pennsylvania Department of Labor and Industry, major employers in the city and county (excluding federal and city government) include the University of Pennsylvania, The School District of Philadelphia, the Children's Hospital of Philadelphia, and Thomas Jefferson University Hospital.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Philadelphia County is home to many large and prominent Universities, including Drexel University, Temple University, the University of Pennsylvania, Thomas Jefferson University, and St. Joseph's University, among others.

Delaware County

Delaware County had a population of 576,830 residents as of the 2020 Census, making it the fourth most populous county in the assessment area, but the third smallest county in the Commonwealth by land volume. The county's median family income of \$99,246 was the second lowest of the counties in the assessment area.

Delaware County is located directly west of the city-county of Philadelphia, and borders Chester County to the west, and the state of Delaware to the south. Its county seat is Media, and the county is home to Ridley Creek State Park (a state protected area), and two national protected areas (First State National Historical Park and John Heinz National Wildlife Refuge).

According to the Pennsylvania Department of Labor and Industry, major employers in the county include The Boeing Company, Delaware County, Wawa Inc., and Villanova University. Colleges and universities located in Delaware County include Haverford College, Swarthmore College, Valley Forge Military Academy, Villanova University, and Widener University, among others.

Seasonally unadjusted unemployment rates for each county in the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. During the evaluation period, seasonally unadjusted unemployment rates throughout the Philadelphia, PA assessment area fell in each year as the region recovered from the high unemployment caused by the COVID-19 Pandemic. In general, unemployment rates in all three years were highest in Philadelphia County, and surpassed both statewide and national levels. Unemployment rates were lowest in Chester County in all years.

Citizens & Northern Bank Philadelphia, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
County	% 2021	% 2022	% 2023
Bucks County	4.9	3.6	3.0
Chester County	3.9	3.0	2.6
Delaware County	5.8	3.9	3.2
Montgomery County	4.6	3.2	2.8
Philadelphia County	8.3	5.0	4.2
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	6.0	3.9	3.6
Commonwealth of Pennsylvania	5.9	4.1	3.4
United States	5.3	3.6	3.6

Unemployment data is from the Bureau of Labor Statistics.

Housing

2015 ACS Data

According to 2015 ACS data, the Philadelphia, PA assessment area contained nearly 1.7 million housing units, of which 60% were owner-occupied, 31% were rental units, and 9% were vacant units. The overall occupancy rate in the assessment area (60%) is comparable to the occupancy rate of the Commonwealth of Pennsylvania, (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to 2015 ACS data, 4% of owner-occupied housing was located in low-income tracts, and 20% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (both measuring 38%).

Of the total existing housing units, 73% were single-family units, 10% were two-to-four family units, 16% were multifamily units (five families or more), and 1% were mobile homes. The median age of the housing stock was 61 years, making it older than that in the Commonwealth of Pennsylvania, where the median age of housing was 54 years. This indicates a potential need for home improvement loans for rehabilitation of the assessment area's housing stock.

Data show that the price of housing in the assessment area is more expensive than in the Commonwealth overall. According to 2015 ACS data, the median housing value in the Philadelphia, PA assessment area was \$244,580, which is appreciably higher than the median housing value in the Commonwealth of Pennsylvania (\$166,000). Data show a disparity between housing values in low- and moderate-income tracts compared to those in middle- and upper-income tracts. The median housing value in low-income tracts was \$80,582, and this increased to \$141,730 in moderate-income tracts. These values were significantly lower than median housing values in middle- and upper-income tracts (\$248,505 and \$336,140, respectively). Finally, in the assessment area, less than 15% of the total owner-occupied housing units were valued at less than \$100 thousand, compared to the Commonwealth, where 26% of owner-occupied housing units were valued at less than \$100 thousand.

Finally, median gross rent (rent plus utilities) was more expensive in the assessment area than in Pennsylvania. Median gross rent in the Philadelphia, PA assessment area was \$1,005, which was well above the median gross rent in Pennsylvania of \$840. Within the Philadelphia, PA assessment area, 50% of renters spent more than 30% of their income on rent, which is a higher figure than in Pennsylvania as a whole (46%).

2020 Census Data

According to the 2020 Census data, the Philadelphia, PA assessment area contained just over 1.7 million housing units, 60% of which were owner-occupied, 32% of which were rental units, and 8% of which were vacant units. The overall occupancy rate in the assessment area was 60%, which is comparable to the occupancy rate of the Commonwealth of Pennsylvania (62%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to 2020 Census data 5% of owner-occupied housing was located in low-income tracts, and 20% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (38% and 37% respectively).

Of the total existing housing units, 73% were single-family units, 9% were two-to-four family units, 17% were multifamily units (five families or more), and 1% were mobile homes. The median age of the housing stock was 61 years, making it older than that in the Commonwealth of Pennsylvania, where the median age of housing was 57 years, indicating a potential need for home improvement loans for rehabilitation of the assessment area's housing stock.

Though home prices increased across the board, data show that the price of housing in the assessment area is once again more expensive than in the Commonwealth overall. According to 2020 Census data, the median housing value in the Philadelphia, PA assessment area was \$275,000, which is appreciably higher than the median housing value in the Commonwealth of Pennsylvania (\$187,500). Data continue to show a disparity between housing values in low- and moderate-income tracts compared to those in middle- and upper-income tracts. The median housing value in low-income tracts was \$100,381, and this increased to \$166,236 in moderate-income tracts. These values were significantly lower than median housing values in middle- and upper-income tracts (\$276,038 and \$379,337, respectively). Finally, in the assessment area, just over 11% of the total owner-occupied housing units were valued at less than \$100 thousand, compared to the Commonwealth, where just under 21% of owner-occupied housing units were valued at less than \$100 thousand.

Finally, median gross rent (rent plus utilities) rose, and was once again more expensive in the assessment area than in Pennsylvania. Median gross rent in the Philadelphia, PA assessment area was \$1,163, which was well above the median gross rent in Pennsylvania of \$958. Within the Philadelphia, PA assessment area, 47% of renters spent more than 30% of their income on rent, which is a higher figure than in Pennsylvania as a whole (43%).

Borrower Income Data

2015 ACS Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 954,348 families in the assessment area. Of these families, over 22% were designated as low-income, 17% were designated as moderate-income, 19% as middle-income, and 41% were upper-income. Families living below the poverty level represented 10% of families in the assessment area, which is slightly higher than the rate of 9% for the Commonwealth of Pennsylvania. It is noteworthy that in Philadelphia County, 21% of families lived below the poverty level.

2020 Census Data

There was little change in the percentage of families of different income levels from the 2015 ACS to the 2020 Census. According to the 2020 Census data, of the 998,995 families in the assessment

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

area, over 22% were designated as low-income, 17% were designated as moderate-income, 19% as middle-income, and 41% were upper-income.

Families living below the poverty level represented 9% of families in the assessment area, which is slightly higher than the rate of 8% for the Commonwealth of Pennsylvania. Again, this measure was by far the highest in Philadelphia County, where over 18% of families lived below the poverty level.

For purposes of evaluating the distribution of loans to borrowers from different income levels, incomes were classified based on HUD-annually adjusted median family income data made available by the FFIEC.

Median family incomes for the assessment area are listed in the table below for each of the years covered by the evaluation and are categorized by the dollar amounts recognized as low-, moderate, middle-, and upper-income respectively.

Metropolitan Division	Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
Montgomery-Bucks-Chester County, PA MD	2021	\$116,300	Less than \$58,150	\$58,150 - \$93,039	\$93,040 - \$139,559	\$139,560 or more
Philadelphia, PA MD	2021	\$67,500	Less than \$33,750	\$33,750 - \$53,999	\$54,000 - \$80,999	\$81,000 or more
Montgomery-Bucks-Chester County, PA MD	2022	\$131,400	Less than \$65,700	\$65,700 - \$105,119	\$105,120 - \$157,679	\$157,680 or more
Philadelphia, PA MD	2022	\$75,000	Less than \$37,500	\$37,500 - \$59,999	\$60,000 - \$89,999	\$90,000 or more
Montgomery-Bucks-Chester County, PA MD	2023	\$142,100	Less than \$71,050	\$71,050 - \$113,679	\$113,680 - \$170,519	\$170,520 or more
Philadelphia, PA MD	2024	\$83,100	Less than \$41,550	\$41,550 - \$66,479	\$66,480 - \$99,719	\$99,720 or more

Geographic Business Data

2015 ACS Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet business demographics, in 2021 there were 208,615 businesses in the assessment area. Of these businesses, 4% were located in low-income tracts, and 18% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (36% and 41% respectively), while just less than 1% of businesses were located in tracts of unknown-income. Business demographic data also revealed that of the 208,615 businesses in the assessment area, 91% were small businesses with gross annual revenues of \$1 million or less.

2020 Census Data

According to Dun & Bradstreet business demographics, in 2022 there were 209,806 businesses in the assessment area. Of these businesses, 4% were located in low-income tracts, and 18% were located in moderate-income tracts. As in the prior year, the majority of businesses were located in middle- and upper-income tracts (35% and 41% respectively), while just less than 2% of businesses

were located in tracts of unknown-income. Business demographic data also revealed that of the 209,806 businesses in the assessment area, just under 92% were small businesses with gross annual revenue of \$1 million or less.

Finally, according to Dun & Bradstreet business demographics, in 2023 there were 214,444 businesses in the assessment area. Of these businesses, 4% were located in low-income tracts, and 18% were located in moderate-income tracts. Once again, the majority of businesses were located in middle- and upper-income tracts (35% and 41% respectively), while 1.7% of businesses were located in tracts of unknown-income. Business demographic data also revealed that of the 214,444 businesses in the assessment area, 92% were small businesses (businesses with gross annual revenue of \$1 million or less).

Assessment area demographics used to evaluate C&N's CRA performance in the Philadelphia, PA assessment area in 2021, 2022 and 2023 are detailed in the tables on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Philadelphia, PA Assessment Area Assessment Area Demographics 2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	72	7.2	59,099	6.2	23,765	40.2	214,075	22.4
Moderate-income	252	25.3	218,050	22.8	39,959	18.3	163,947	17.2
Middle-income	330	33.1	347,709	36.4	22,511	6.5	184,500	19.3
Upper-income	327	32.8	328,927	34.5	10,812	3.3	391,826	41.1
Unknown-income	17	1.6	563	0.1	120	21.3	0	0.0
Total Assessment Area	998	100.0	954,348	100.0	97,167	10.2	954,348	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	120,815	39,971	4.0	33.1	61,227	50.7	19,617	16.2
Moderate-income	425,882	197,622	20.0	46.4	171,862	40.4	56,398	13.2
Middle-income	567,990	375,633	37.9	66.1	154,956	27.3	37,401	6.6
Upper-income	543,769	377,010	38.1	69.3	132,000	24.3	34,759	6.4
Unknown-income	2,575	68	0.0	2.6	2,267	88.0	240	9.3
Total Assessment Area	1,661,031	990,304	100.0	59.6	522,312	31.4	148,415	8.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	8,897	4.3	8,189	4.3	658	4.1	50	2.9
Moderate-income	38,017	18.2	35,105	18.4	2,589	16.0	323	18.8
Middle-income	74,939	35.9	68,275	35.8	6,047	37.3	617	36.0
Upper-income	85,370	40.9	78,064	40.9	6,591	40.6	715	41.7
Unknown-income	1,392	0.7	1,049	0.6	333	2.0	10	0.6
Total Assessment Area	208,615	100.0	190,682	100.0	16,218	100.0	1,715	100.0
	Percentage of Total Businesses:			91.4		7.8		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	16	1.2	15	1.2	1	1.3	0	0.0
Moderate-income	192	14.0	180	13.9	12	15.0	0	0.0
Middle-income	703	51.3	660	51.1	43	53.7	0	0.0
Upper-income	457	33.3	433	33.5	24	30.0	0	0.0
Unknown-income	3	0.2	3	0.3	0	0.0	0	0.0
Total Assessment Area	1,371	100.0	1,291	100.0	80	100.0	0	0.0
	Percentage of Total Farms:			94.2		5.8	0	0.0

2015 ACS Data and 2021 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Philadelphia, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	71	6.8	63,110	6.3	21,126	33.5	222,145	22.2
Moderate-income	245	23.3	224,311	22.5	34,872	15.5	170,743	17.1
Middle-income	339	32.3	363,410	36.4	21,299	5.9	193,035	19.3
Upper-income	352	33.5	337,875	33.8	9,958	2.9	413,072	41.4
Unknown-income	43	4.1	10,289	1.0	3,280	31.9	0	0.0
Total Assessment Area	1,050	100.0	998,995	100.0	90,535	9.1	998,995	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	121,493	46,288	4.5	38.1	59,358	48.9	15,847	13.0
Moderate-income	410,721	202,312	19.7	49.3	166,651	40.6	41,758	10.2
Middle-income	586,309	390,054	37.9	66.5	162,831	27.8	33,424	5.7
Upper-income	565,723	382,185	37.1	67.6	149,127	26.4	34,411	6.2
Unknown-income	18,898	8,530	0.8	45.1	7,747	41.0	2,621	13.9
Total Assessment Area	1,703,144	1,029,369	100.0	60.4	545,714	32.0	128,061	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	8,884	4.2	8,304	4.3	535	3.3	45	2.6
Moderate-income	37,731	18.0	34,897	18.2	2,540	15.8	294	17.1
Middle-income	72,696	34.6	66,678	34.7	5,414	33.6	604	35.1
Upper-income	86,849	41.4	79,014	41.2	7,086	44.0	749	43.5
Unknown-income	3,646	1.8	3,086	1.6	531	3.3	29	1.7
Total Assessment Area	209,806	100.0	191,979	100.0	16,106	100.0	1,721	100.0
	Percentage of Total Businesses:			91.5		7.7		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	19	1.4	18	1.4	1	1.3	0	0.0
Moderate-income	206	15.1	185	14.4	21	27.3	0	0.0
Middle-income	658	48.4	627	48.9	31	40.3	0	0.0
Upper-income	468	34.4	444	34.6	24	31.1	0	0.0
Unknown-income	9	0.7	9	0.7	0	0.0	0	0.0
Total Assessment Area	1,360	100.0	1,283	100.0	77	100.0	0	0.0
	Percentage of Total Farms:			94.3		5.7	0	0.0

2020 Census Data and 2022 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Philadelphia, PA Assessment Area Assessment Area Demographics 2023								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	71	6.8	63,110	6.3	21,126	33.5	222,145	22.2
Moderate-income	245	23.3	224,311	22.5	34,872	15.5	170,743	17.1
Middle-income	339	32.3	363,410	36.4	21,299	5.9	193,035	19.3
Upper-income	352	33.5	337,875	33.8	9,958	2.9	413,072	41.4
Unknown-income	43	4.1	10,289	1.0	3,280	31.9	0	0.0
Total Assessment Area	1,050	100.0	998,995	100.0	90,535	9.1	998,995	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	121,493	46,288	4.5	38.1	59,358	48.9	15,847	13.0
Moderate-income	410,721	202,312	19.7	49.3	166,651	40.6	41,758	10.2
Middle-income	586,309	390,054	37.9	66.5	162,831	27.8	33,424	5.7
Upper-income	565,723	382,185	37.1	67.6	149,127	26.4	34,411	6.1
Unknown-income	18,898	8,530	0.8	45.1	7,747	41.0	2,621	13.9
Total Assessment Area	1,703,144	1,029,369	100.0	60.4	545,714	32.0	128,061	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	9,181	4.3	8,601	4.4	530	3.3	50	2.9
Moderate-income	38,878	18.1	36,043	18.3	2,540	15.9	295	17.3
Middle-income	74,203	34.6	68,273	34.7	5,337	33.4	593	34.8
Upper-income	88,491	41.3	80,707	41.0	7,048	44.1	736	43.2
Unknown-income	3,691	1.7	3,147	1.6	515	3.3	29	1.8
Total Assessment Area	214,444	100.0	196,771	100.0	15,970	100.0	1,703	100.0
	Percentage of Total Businesses:			91.8		7.4		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	19	1.4	18	1.4	1	1.3	0	0.0
Moderate-income	209	15.0	189	14.4	20	26.3	0	0.0
Middle-income	673	48.3	643	48.9	30	39.5	0	0.0
Upper-income	482	34.6	457	34.7	25	32.9	0	0.0
Unknown-income	9	0.7	9	0.6	0	0.0	0	0.0
Total Assessment Area	1,392	100.0	1,316	100.0	76	100.0	0	0.0
	Percentage of Total Farms:			94.5		5.5	0	0.0

2020 Census Data and 2023 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of different sizes including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

C&N's lending levels in the Philadelphia, PA assessment area reflect good responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Philadelphia, PA assessment area represented 20% of the bank's overall lending by number of loans, and 40% by dollar volume. During the evaluation period, C&N made 271 HMDA loans totaling nearly \$167.5 million, 607 small business loans totaling \$114.7 million, and two small farm loans totaling \$34 thousand in the Philadelphia, PA assessment area.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, adequate penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending performance. Further, due to loan volumes, small business loans were given the most weight in determining the bank's overall borrower distribution of loans, followed by HMDA loans.

Small Business Lending

An analysis of C&N's borrower distribution of small business loans reflects adequate penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to Dun & Bradstreet business demographic data, in 2021 there were 208,615 businesses in the assessment area, with 190,682 (91%) designated as small businesses. In 2022, there were 209,806 businesses in the assessment area, 191,979 (almost 92%) of which were small businesses. Finally, in 2023, there were 214,444 businesses in the assessment area, 196,771 (92%) of which were small businesses.

2015 ACS Data

In 2021, the bank's borrower distribution of small business loans was good. In 2021, C&N originated 389 small business loans within the assessment area, aggregating \$54.2 million. Of these loans, 56% (219 loans) were originated to small businesses. This performance was above the aggregate lending level of 44.3% to small businesses, but below the proxy of 91%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2021, 64% of C&N's small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 91% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

2020 Census Data

The bank's borrower distribution of small business loans in 2022 was adequate. In 2022, C&N originated 109 small business loans within the assessment area, aggregating \$32.1 million, of which 49% (53 loans) were originated to small businesses. This performance was just below the aggregate lending level of 50% to small businesses, and well below the proxy of 92%. In 2022, 34% of C&N's small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 94% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

The bank's borrower distribution of small business loans in 2023 was adequate. In 2023, C&N originated 109 small business loans within the assessment area, aggregating \$28.4 million, of which 46% (50 loans) were originated to small businesses. This performance was below the aggregate lending level of 52.6% to small businesses, and well below the proxy of 92%. In 2023, 43% of C&N's small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 95% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Home-Mortgage Lending

C&N's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is poor.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 22% of assessment area families were designated as low-income, 17% were moderate-income, 19% were middle-income, and 41% were upper-income. Similarly, according to the 2020 Census data, 22% of assessment area families were designated as low-income, 17% were moderate-income, 19% were middle-income, and 41% were upper-income. According to available data, 39% of families, in both the 2015 ACS survey and 2020 Census, were designated as low- or moderate-income families. This indicates a significant need for home-mortgage credit among this segment of the population.

The following tables compare C&N's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate lending in 2021, relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data. The remaining tables, used to evaluate 2022 and 2023 lending, rely on 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data following the requirements of Regulation C.

Citizens & Northern Bank Philadelphia, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	22.4	1.2	6.9
Moderate	17.2	11.1	16.8
Middle	19.3	18.6	21.4
Upper	41.1	28.4	39.2
Unknown	0.0	40.7	15.7
Total	100.0	100.0	100.0

Citizens & Northern Bank Philadelphia, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	22.2	0.8	8.8
Moderate	17.1	6.7	18.8
Middle	19.3	9.2	21.6
Upper	41.3	40.0	36.1
Unknown	0.0	43.3	14.7
Total	100.0	100.0	100.0

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Philadelphia, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2020 Census Data)	Aggregate Comparison	
		2023	
		% C&N Lending	% Aggregate Lending
Low	22.2	2.9	8.4
Moderate	17.1	5.7	18.6
Middle	19.3	14.3	22.1
Upper	41.3	47.1	34.4
Unknown	0.0	30.0	16.5
Total	100.0	100.0	100.0

Lending to Low-Income Borrowers

Overall, C&N's lending to low-income borrowers was very poor.

2015 ACS Data

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a downpayment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities. The bank's branch locations also limit lending opportunities. Of the three branches the bank operates in the assessment area, none are located in the city of Philadelphia, where a significant portion of low-income individuals and tracts are located. Finally, it should be noted that this evaluation represents the first time that this assessment area has included the counties of Delaware and Philadelphia, as the bank is relatively new to the market.

C&N's lending in 2021 to low-income borrowers was very poor. In 2021, 1% of the bank's HMDA loans (one loan) were to low-income borrowers in the assessment area, which was well below both the aggregate lending level of 7% and the proxy of low-income families (22%). By product type, C&N's sole loan to a low-income borrower was a refinance loan. In comparison, 2021 aggregate lending data shows that 8% of home purchase loans, 6% of refinance loans, 7% of home improvement loans, less than 1% of multifamily loans, 9% of other purpose lines of credit, 9% of other purpose closed/exempt loans, and less than 1% of loans with purpose "not applicable" were made to low-income borrowers.

2020 Census Data

In 2022, C&N's lending to low-income borrowers was very poor. In total, less than 1% of the bank's HMDA loans (one loan) were originated to low-income borrowers, which was well below both the aggregate lending level of 9% and the proxy of 22%. By product type, C&N's single HMDA loan made to a low-income borrower was a home purchase loan. In comparison, 2022 aggregate lending data shows that 8% of home purchase loans, 11% of refinance loans, 8% of home improvement loans, 10% of other purpose lines of credit, 10% of other purpose closed/exempt loans, 1% of loans with purpose "not applicable," and no multifamily loans were made to low-income borrowers.

In 2023, C&N's lending to low-income borrowers was very poor. In total, 3% of the bank's HMDA loans (two loans) were originated to low-income borrowers, which was well below both the aggregate lending level of 8% and the proxy of 22%. By product type, C&N originated one refinance loan and one home improvement loan to low-income borrowers in 2023. In comparison, 2023 aggregate lending data shows that 7% of home purchase loans, 11% of refinance loans, 9% of home improvement loans, less than 1% of multifamily loans, 10% of other purpose lines of credit, 11% of other purpose closed/exempt loans, and 1% of loans with purpose "not applicable" were made to low-income borrowers.

Lending to Moderate-Income Borrowers

For the period under review, the bank's lending to moderate-income borrowers was poor.

2015 ACS Data

C&N's lending in 2021 to moderate-income borrowers was poor. In 2021, 11% of the bank's HMDA loans (nine loans) were to moderate-income borrowers in the assessment area, which was below both the aggregate lending level, and the proxy, both of which were 17%. By product type, C&N originated 4% of its home purchase loans, 22% of its refinance loans, and no home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" to moderate-income borrowers in 2021. In comparison, 2021 aggregate lending data shows that 19% of home purchase loans, 16% of refinance loans, 16% of home improvement loans, less than 1% of multifamily loans, 6% of other purpose lines of credit, 16% of other purpose closed/exempt loans, and less than 1% of loans with purpose "not applicable" were made to moderate-income borrowers.

2020 Census Data

C&N's lending in 2022 to moderate-income borrowers was poor. In 2022, 7% of the bank's HMDA loans (eight loans) were to moderate-income borrowers in the assessment area, which was below both the aggregate lending level of 19%, and the proxy of moderate-income families of 17%. By product type, C&N originated 5% of its home purchase loans, 6% of its refinance loans, 25% of its home improvement loans, 43% of its other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, 2022 aggregate lending data shows that 19% of home purchase loans, 20% of refinance loans, 18% of home improvement loans, less than 1% of multifamily loans, 19% of other purpose lines of credit, 21% of other purpose closed/exempt loans, and less than 1% of loans with purpose "not applicable" were made to moderate-income borrowers.

Finally, C&N's lending in 2023 to moderate-income borrowers was poor. In 2023, 6% of the bank's HMDA loans (four loans) were to moderate-income borrowers in the assessment area, which was well below both the aggregate lending level of 19% and the proxy of 17%. By product type, C&N originated 4% of its home purchase loans, 6% of its refinance loans, 17% of its home improvement loans, 6% of its other purpose line of credit, and no multifamily loans, other purpose closed/exempt loans, or loans with purpose "not applicable" to moderate-income borrowers in 2023.

In comparison, 2023 aggregate lending data shows that 18% of home purchase loans, 19% of refinance loans, 20% of home improvement loans, less than 1% of multifamily loans, 20% of other purpose lines of credit loans, 23% other purpose closed/exempt loans, and less than 1% of loans with purpose “not applicable” were made to moderate-income borrowers.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects adequate penetration throughout the Philadelphia, PA assessment area, including low- and moderate-income tracts. Once again, it is noted that small business loans were given greater weight in determining this conclusion, given their higher volume by number and dollar amount, followed by HMDA loans.

Small Business Lending

The geographic distribution of C&N’s small business lending reflects adequate penetration throughout the assessment area, in the context of the assessment area’s demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. According to Dun & Bradstreet data in 2021, 4% of the assessment area’s businesses were located in low-income tracts, and 18% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (36% and 41%, respectively), while 1% of businesses were located in tracts of unknown-income. In 2022, 4% of businesses in the assessment area were located in low-income tracts, and 18% were located in moderate-income tracts. Again, the majority of businesses were located in middle- and upper-income tracts (35% and 41%, respectively), while 2% of businesses were located in tracts of unknown-income. Finally, in 2023, 4% of businesses in the assessment area were located in low-income tracts and 18.1% of businesses were located in moderate-income tracts. Once again, the majority of businesses were located in middle- and upper-income tracts (35% and 41%, respectively), while 2% of businesses were located in tracts of unknown-income.

The tables below present C&N’s small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	4.3	2.1	4.0
Moderate	18.2	14.4	18.3
Middle	35.9	43.4	36.3
Upper	40.9	39.8	40.4
Unknown	0.7	0.3	0.6
Tract Unknown	0.0	0.0	0.4
Total	100.0	100.0	100.0

Citizens & Northern Bank Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	4.2	0.9	4.0
Moderate	18.0	13.8	18.5
Middle	34.7	53.2	35.4
Upper	41.4	32.1	40.3
Unknown	1.7	0.0	1.4
Tract Unknown	0.0	0.0	0.4
Total	100.0	100.0	100.0

Citizens & Northern Bank Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2020 Census Data)	Aggregate Comparison	
		2023	
		% C&N Lending	% Aggregate Lending
Low	4.3	0.9	3.7
Moderate	18.1	23.9	18.2
Middle	34.6	47.7	35.0
Upper	41.3	25.7	41.4
Unknown	1.7	1.8	1.3
Tract Unknown	0.0	0.0	0.7
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

C&N's small business lending in low-income tracts was poor.

2015 ACS Data

In 2021, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. C&N originated 2% of its small business loans (eight loans) in the assessment area's low-income census tracts. The bank's lending level was below both the applicable loan demand, and the 2021 aggregate small business lending level, both of which were of 4%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in low-income census tracts was poor. C&N originated 1% of its small business loans (one loan) in a low-income census tract. The bank's lending level was below both the applicable loan demand proxy, and the 2022 aggregate small business lending level (both 4%).

In 2023, the geographic distribution of the bank's small business lending in low-income census tracts was poor. C&N originated 1% of its small business loans (one loan) in a low-income census tract. The bank's lending level was below both the applicable loan demand proxy of 4%, and the 2023 aggregate small business lending level of just under 4%.

Lending in Moderate-Income Census Tracts

C&N's small business lending in moderate-income tracts was adequate.

2015 ACS Data

In 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. C&N originated 14% of its small business loans (56 loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable loan demand proxy of 18%, and the 2021 aggregate small business lending level of 18%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. C&N originated 14% of its small business loans (15 loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable loan demand proxy of 18%, and the 2022 aggregate small business lending level of 19%.

In 2023, the geographic distribution of the bank's small business lending in moderate-income census tracts was excellent. C&N originated 24% of its small business loans (26 loans) in the assessment area's moderate-income census tracts. The bank's lending level was above both the applicable loan demand proxy, and the 2023 aggregate small business lending level, both of which were 18%.

Home-Mortgage Lending

C&N's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts, is good. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, 4% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 20% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (38% and 38% respectively). Likewise, according to 2020 Census data, 5% of the owner-occupied housing stock was located in low-income census tracts, and 20% was located in moderate-income tracts. Again, the majority of owner-occupied units were located in middle- and upper-income tracts (38% and 37% respectively).

The following tables present C&N's geographic distribution of HMDA loans from 2021 through 2023, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The first table, used for lending in 2021, relies on 2015 ACS data, along with updated HMDA data. Both the second table and the third table use 2020 Census data and updated HMDA data.

Citizens & Northern Bank Philadelphia, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	4.0	1.2	2.6
Moderate	20.0	24.7	17.3
Middle	37.9	35.8	38.6
Upper	38.1	38.3	41.5
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Citizens & Northern Bank Philadelphia, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	4.5	6.7	4.1
Moderate	19.7	20.8	19.8
Middle	37.9	36.7	36.9
Upper	37.1	35.0	38.4
Unknown	0.8	0.8	0.8
Total	100.0	100.0	100.0

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Philadelphia, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison	
		2023	
		% C&N Lending	% Aggregate Lending
Low	4.5	5.7	4.3
Moderate	19.7	15.7	21.2
Middle	37.9	41.5	36.8
Upper	37.1	37.1	36.9
Unknown	0.8	0.0	0.8
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

C&N's overall HMDA lending in low-income tracts was good.

2015 ACS Data

C&N's lending in low-income census tracts in 2021 was adequate. C&N originated just over 1% of HMDA loans (one loan) in low-income census tracts in 2021, which was below the proxy of 4%, and the aggregate lending level of 3%. Categorized by loan product type, C&N's single loan in a low-income census tract was a refinance loan. Aggregate 2021 lending data show that 4% of home purchase loans, 2% of refinance loans, 3% of home improvement loans, 14% of multifamily loans, 1% of other purpose lines of credit, 2% of other purpose closed/exempt loans, and 5% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

2020 Census Data

C&N's lending in low-income census tracts in 2022 was considered excellent. C&N originated 7% of HMDA loans (eight loans) in low-income census tracts in 2022, which was above the proxy of 5% and the aggregate lending level of 4%. Categorized by loan product type, C&N made 12% of its home purchase loans, 15.0% of multifamily loans, and no refinance loans, home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" loans in low-income tracts in 2022. Aggregate 2022 lending data show that 5% of home purchase loans, 4% of refinance loans, 3% of home improvement loans, 14% of multifamily loans, 2% of other purpose lines of credit loans, 4% of other purpose closed/exempt loans, and 7% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Finally, C&N's lending in low-income census tracts in 2023 was good. C&N originated 6% of HMDA loans (four loans) in low-income census tracts in 2023, which was just above the proxy of 5%, and the aggregate lending level of 4%. Categorized by loan product type, C&N made 13% of its home purchase loans, 14.3% of multifamily loans, no refinance loans, home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" in low-income tracts in 2023. Aggregate 2023 lending data show that 5% of home purchase loans, 5% of refinance loans, 3% of home improvement loans, 13% of multifamily loans, 2% of other purpose lines of credit, 4% of other purpose closed/exempt loans, and 7% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Lending in Moderate-Income Census Tracts

C&N's overall HMDA lending in moderate-income tracts was good.

2015 ACS Data

The bank's lending in moderate-income census tracts in 2021 was excellent. In 2021, C&N's HMDA lending in moderate-income tracts was 25% (20 loans), which measured above the proxy of 20% of owner-occupied housing in moderate-income tracts, as well as the aggregate performance of 17%. Categorized by loan product type, C&N made 38% of its home purchase loans, 5% of its refinance loans, 50% of its multifamily loans, and no home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" in moderate-income tracts. Aggregate lending data shows that 21% of home purchase loans, 15% of refinance loans, 15% of home improvement loans, 39% of multifamily loans, 12% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and 36% of loans with purpose "not applicable" were made in moderate-income census tracts in the assessment area in 2022.

2020 Census Data

The bank's lending in moderate-income census tracts in 2022 was excellent. In 2022, C&N's HMDA lending in moderate-income tracts was 21% (25 loans), which measured just above the proxy of 20% of owner-occupied housing in moderate-income tracts, as well as the aggregate performance, which was also 20%. Categorized by loan product type, C&N made 26% of its home purchase loans, 6% of its refinance loans, 38% of its home improvement loans, 35% of its multifamily loans, 8% of its other purpose line of credit, 14% of its other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2022. Aggregate lending data shows that 22% of home purchase loans, 20% of refinance loans, 16% of home improvement loans, 32% of multifamily loans, 13% of other purpose line of credit, 18% of other purpose closed/exempt loans, and 31% of loans with purpose "not applicable" were made in moderate-income census tracts in the assessment area in 2022.

Finally, the bank's lending in moderate-income census tracts in 2023 was adequate. In 2023, C&N's HMDA lending in moderate-income tracts was 16% (11 loans), which was below the proxy of 20% of owner-occupied housing in moderate-income tracts, as well as the aggregate performance of 21%. Categorized by loan product type, C&N made 17% of its home purchase loans, 12% of its refinance loans, 17% of its home improvement loans, 43% of its multifamily loans, 6% of its other purpose line of credit, and no other purpose closed/exempt loans, or loans with purpose "not applicable" loans in moderate-income tracts in 2023. Aggregate lending data shows that 22% of home purchase loans, 22% of refinance loans, 18% of home improvement loans, 33% of multifamily loans, 14% of other purpose lines of credit, 20% of other purpose closed/exempt loans, and 33% of loans with purpose "not applicable" were made in moderate-income census tracts in the assessment area in 2023.

Responsiveness to Credit Needs

C&N exhibits an adequate record of servicing the credit needs of low- and moderate-income individuals and areas and very small businesses, consistent with safe and sound banking practices. As mentioned previously, the primary community development need mentioned by community contact was affordable housing. In addition to responsiveness through its retail HMDA lending, particularly its geographic distribution of HMDA loans, 17 of the bank's community development loans totaling \$6.7 million (12%) benefitted affordable housing for low- and moderate-income individuals in the assessment area.

Innovative and/or Flexible Lending Practices

C&N makes little use of innovative and/or flexible lending practices in serving the credit needs of the Philadelphia, PA assessment area.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. The bank offers several programs for first-time homebuyers, but no such loans were made to borrowers in the Philadelphia, PA assessment area during the review period.

Similarly, the credit needs of small businesses can often be addressed more effectively through alternative products. In an effort to address the credit needs of small businesses in its assessment area, C&N participates in SBA loan programs. The bank made four SBA loans totaling just over \$2.2 million. Additionally, the bank made one FHLB of Pittsburgh Banking on Business loan totaling \$283 thousand in this assessment area.

Community Development Lending

C&N was a leader in making community development loans in the Philadelphia, PA assessment area.

During the period evaluated, which includes the timeframe between February 1, 2022 through November 4, 2024, the bank made 32 qualified community development loans in the assessment area, totaling \$57.8 million. Of the bank's total community development lending by dollar volume, nearly 87% was within the bank's Philadelphia, PA assessment area.

C&N's community development lending showed a substantial increase from the previous examination when community development loans totaled \$7.8 million. It is also noteworthy that since the previous examination, the bank's assessment area was expanded to include Delaware and Philadelphia Counties.

Of the bank's 32 community development loans, 17 loans totaling \$6.7 million (12%) supported affordable housing for low- and moderate-income individuals. Twelve loans totaling \$50 million (87%) supported revitalization and stabilization efforts in the assessment area. Finally, three loans totaling just over \$1 million (2%) supported community services benefitting low- and moderate-income individuals and areas within the assessment area.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

The following table includes the bank’s community development loans, broken out by community development purpose.

Citizens & Northern Bank Philadelphia, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2022	8	3,950	1	11	0	0	8	30,279	17	34,240
2023	1	16	1	100	0	0	3	15,148	5	15,264
2024	8	2,707	1	1,000	0	0	1	4,613	10	8,320
TOTAL	17	6,673	3	1,111	0	0	12	50,040	32	57,824

INVESTMENT TEST

The investment test evaluates a financial institution’s level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Volume of Investment and Grant Activity

C&N made a significant level of qualified community development investments and grants, occasionally in a leadership position. Qualified investments, grants, and donations for the Philadelphia, PA assessment area totaled over \$14.7 million, a notable increase from the previous CRA examination when the bank’s investments totaled \$3.9 million in the assessment area. As mentioned previously, it is noteworthy that the bank’s assessment area expanded since the previous CRA evaluation to include Delaware and Philadelphia Counties. Of the bank’s overall investments, 49% were made within the Philadelphia, PA assessment area.

The majority of qualified investments supported affordable housing for low- and moderate-income borrowers. The bank made 20 investments totaling nearly \$12.9 million (89%) to support affordable housing in the Philadelphia, PA assessment area. A majority of these investments were in mortgage-backed securities, supporting home ownership for low- and moderate-income borrowers or geographies. The bank also made four investments totaling \$1.6 million (11%) supporting community services in the assessment area.

In addition to the qualified investments discussed above, the bank also made 26 donations totaling nearly \$209 thousand to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, \$46 thousand (22%) supported affordable housing, and almost \$163 thousand (78%) supported community services.

LARGE INSTITUTION PERFORMANCE EVALUATION

NOVEMBER 2024

The following table presents the investments and grant activity of the Philadelphia, PA assessment area.

Citizens & Northern Bank Philadelphia, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	20	12,899	4	1,635	0	0	0	0	24	14,534
Donations	6	46	20	163	0	0	0	0	26	209
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	26	12,945	24	1,798	0	0	0	0	50	14,743

Responsiveness to Credit and Community Development Needs

C&N exhibits good responsiveness to credit and community development needs of the assessment area. As mentioned previously, the level of qualified investments and grants greatly increased since the prior evaluation. Further, as noted in the table above, the vast majority of the bank's qualified investments by dollar amount (88%) supported affordable housing in the assessment area, a pronounced community need as indicated through community development interviews.

Community Development Initiatives

C&N makes occasional use of innovative and/or complex investments to support community development initiatives. In the Philadelphia, PA assessment area, the bank invested in seven mortgage-backed securities to support home ownership for low- and moderate-income borrowers in the assessment area. The bank also invested in bonds and EITCs to support school districts with over half of students qualifying for free and/or reduced lunch in the assessment area. These investment types are more complex than simple donations.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting the assessment area needs; and
- The extent to which an institution provides community development services.

Accessibility of Delivery Systems

Delivery systems are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in its assessment area. During the review period, C&N operated three full-service branches in the Philadelphia, PA assessment area (11% of all branches).¹⁰ Using 2015 ACS data, one branch was located in a middle-income tract (33%), and two were located in upper-income tracts (67%). Census tract income levels changed with the updated 2020 Census, and as a result, the income levels of branches changed. More specifically, using 2020 Census data, all three branches were located in upper-income tracts. Additionally, there were no branches located in the city of Philadelphia, the largest population center in the assessment area. This presents a barrier to the bank's ability to serve its entire assessment area, requiring customers living in Philadelphia to travel a significant distance in and out of the city for in-person banking services.

The following tables detail the locations of the bank's branches with comparison to 2015 ACS and 2020 Census population demographics.

Citizens & Northern Bank Philadelphia, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent Branches	Population	Percent of Population
Low	0	0.0	290,440	7.1
Moderate	0	0.0	1,009,619	24.8
Middle	1	33.3	1,413,391	34.8
Upper	2	66.7	1,336,223	32.9
Unknown Income	0	0.0	16,432	0.4
Totals	3	100.0	4,066,105	100.0

Citizens & Northern Bank Philadelphia, PA Assessment Area Retail Branch Distribution 2020 Census Data				
Census Tract Type	Number of Branches	Percent Branches	Population	Percent of Population
Low	0	0.0	288,086	6.8
Moderate	0	0.0	996,570	23.6
Middle	0	0.0	1,461,385	34.7
Upper	3	100.0	1,412,471	33.5
Unknown Income	0	0.0	59,619	1.4
Totals	3	100.0	4,218,131	100.0

ATMs are available at two of the three branch locations¹¹ in the Philadelphia, PA assessment area, which provides electronic access to banking services. In addition, C&N participates in the AllPoint ATM network in its Philadelphia, PA assessment area, which provides access to surcharge free ATMs nationwide. To supplement traditional banking services, C&N provides alternative delivery systems

¹⁰ On July 12, 2022, the bank closed one branch located at 1500 E. Lancaster Avenue, Paoli, PA, and opened another located at 500 Chesterbrook Boulevard, Chesterbrook, PA. As a result, the Paoli branch was included in the 2015 ACS analysis, and the Chesterbrook branch was used in 2020 analysis.

¹¹ The Doylestown branch at 60 North Main Street, Doylestown, PA 18901 does not have an ATM. That said, the bank does operate a standalone full-service ATM near to the branch, at 465 N Main Street, Doylestown, PA 18901.

through its full-service website. Customers are able to pay bills, view and print statements, collect recurring customer payments, transfer money between accounts, reorder checks, deposit payroll, and apply for loans using the bank's online website at cnbankpa.com.

Changes in Branch Locations

C&N's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals.

Within the Philadelphia, PA assessment area, one branch was closed since the previous examination, and one branch was opened. A branch located in an upper-income census tract in Paoli, PA, was closed on July 12, 2022. On the same day, the bank opened a branch in an upper-income tract in Chesterbrook, PA.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned previously, two of the three branches in the Philadelphia, PA assessment area have ATMs.¹² The bank also operates one standalone ATM.¹³ No branches in the assessment area offer drive-through services due to physical limitations. All full-service branches within the assessment area operate Monday through Friday. One branch in the assessment area offers limited Saturday hours.¹⁴

Bank Products

C&N offers products that provide greater access to banking services for low- and moderate-income customers, including C&N Everyday Checking Account Basic Checking, a free checking account for consumers, which features no minimum monthly balance requirements, no monthly maintenance charges, and no per-check charges. Additionally, the bank offers a Simple Debit Account, which is a certified Bank-On account targeted to unbanked and underbanked individuals, and serves as a second chance account for customers who may not qualify for a traditional account due to a past charge-off. The Simple Debit account has a \$5 service charge per month, offers free printed and electronic statements, free online bill payment, and contains no nonsufficient funds, uncollected funds, or overdraft fees.

The bank also offers products to serve the needs of businesses of different sizes. The bank's Super B Checking Account is a basic checking account that is ideal for small businesses with limited transaction activity. For businesses with a desire to earn interest, the bank offers a Business Interest Checking Account, though this requires the business to maintain a balance of \$1,000 or greater each

¹²The Doylestown (upper-income) branch does not have an ATM.

¹³The bank operates a stand-alone ATM in Doylestown, PA in a moderate-income tract.

¹⁴Saturday hours are not offered at the Chesterbrook (upper-income) and Newtown (upper-income) branches.

month. Both business accounts offer 250 free transaction items processed through the account, with transactions above the monthly maximum incurring a \$.25 per item charge. This account allows very small businesses access to banking services that meet their needs.

Community Development Services

C&N provides an adequate level of community development services in the assessment area.

Over the evaluation period, bank officers and employees provided qualified community development services, serving in various capacities on boards and committees, and providing technical assistance to community and economic development organizations. Some notable examples included:

- An employee serves on the steering committee for the Growth, Resilience, Independence, and Tenacity (GRIT) Fund, a program that provides resources to CDFIs serving the Philadelphia Region, and aims to increase economic opportunities for minority and small business owners.
- An employee serves on the board of the North Penn Valley Boys and Girls Club, which provides community services like affordable childcare to low- and moderate-income individuals in the assessment area.
- An employee serves as a loan committee member for Community Lenders Community Development Corporation, an organization investing in community redevelopment and revitalization projects in the counties included in the Philadelphia, PA assessment area.
- An employee serves on the board of Vita Educational Services, an organization serving the unemployed, underemployed, immigrants and adults in the criminal justice system, by providing education and literacy programs.

Additionally, the bank sponsored several informational seminars in low- and moderate income geographies within the assessment area, covering topics like purchasing a home, starting a business, along with general financial literacy presentations to schools where over half of students qualify for free or reduced lunch in the assessment area.

Finally, the bank participated as an intermediary for the FHLB Pittsburgh's "Home4Good Initiative." Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to the FHLB of Pittsburgh, on their behalf. The bank's efforts brought in \$2.3 million in Home4Good funding into the assessment area.

WILLIAMSPORT, PA ASSESSMENT AREA
LIMITED-SCOPE REVIEW

A limited-scope review of the bank’s performance in the Williamsport, PA assessment area was conducted. For the purposes of assessing C&N’s performance in the Commonwealth of Pennsylvania and overall, the Williamsport, PA assessment area was given the third highest weight, behind the PA Non-MSA, and Philadelphia, PA assessment areas, given the bank’s volumes of loans, deposits, and operations in this assessment area. More specifically, during the evaluation period, lending activity in the Williamsport, PA assessment area represented 10% of loans by number, and 9% of loans by dollar volume. The assessment area’s five branches (19% of total branches) held \$293.5 million in deposits, or 14% of the bank’s total deposits as of June 30, 2024. Though this assessment area was given the third highest weight in determining the statewide rating, it was evaluated using limited-scope review procedures, as a full-scope review was conducted at the previous CRA evaluation.

The bank’s performance in the Williamsport, PA assessment area was consistent with its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the tables located in the appendices accompanying this report. Conclusions regarding performance are as follows:

ASSESSMENT AREA	LENDING TEST	INVESTMENT TEST	SERVICE TEST
Williamsport, PA Assessment Area	Consistent	Consistent	Consistent

DESCRIPTION OF INSTITUTION’S OPERATIONS

The bank’s Williamsport, PA assessment area consists of the entirety of Lycoming County, which comprises the Williamsport, PA MSA.

According to 2015 ACS data, the Williamsport, PA assessment area consisted of 29 census tract, two of which were designated as low-income (7%), four of which were moderate-income (14%), 21 of which were middle-income (72%), and two of which were upper-income (7%).

According to the 2020 Census data, there were 32 census tracts in the assessment area, one of which was designated as low-income (3%), one of which was moderate-income (3%), 23 of which were middle-income (72%), six of which were upper-income (19%), and one of which was unknown-income (3%).

Maps of the Williamsport, PA assessment area using both 2015 ACS data and 2020 Census data are available in Appendix F.

C&N’s performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC’s Deposit Market Share Report, as of June 30, 2024, there were 12 depository institutions operating in the bank’s Williamsport, PA assessment area.

These institutions maintained a total of 45 branches, holding \$3.0 billion in deposits. C&N, with five branches in the assessment area, ranked fifth, with \$293.5 million, or 10% of the deposit market. Jersey Shore State Bank ranked first with nine branches holding \$655.6 million in deposits (22% of the market), followed by Woodlands Bank with seven branches and \$495.1 million in deposits (16% of the market), and Journey Bank with eight branches and \$464.3 million in deposits (15% of the market).

C&N reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2021, a total of 195 institutions reported 4,393 HMDA loan originations and purchases within the assessment area. C&N ranked ninth in the HMDA market with almost 3% of total originations and purchases. Jersey Shore State Bank led the HMDA market, with 17% of the market share, followed by Rocket Mortgage, LLC with 9% of the market share, and The Muncy Bank and Trust Company with 9% of the HMDA market.

The 2022 aggregate HMDA data showed a 21% decrease in overall HMDA lending, with 164 lenders originating and purchasing 3,465 home-mortgage loans in the assessment area. C&N again ranked ninth in the HMDA market with 3% of total originations and purchases. Jersey Shore State Bank ranked first in the HMDA market, with 24% of the market share, followed by The Muncy Bank and Trust Company with 14% of the HMDA market, and PrimeLending, a Plains Capital Company with 8% of the HMDA market.

Finally, the 2023 aggregate HMDA data showed another 27% decrease in overall HMDA lending, with 148 lenders originating and purchasing 2,537 home-mortgage loans in the assessment area. C&N ranked eighth in the HMDA market with under 3% of total originations and purchases. The top three originators in the HMDA market remained the same as the previous year. Jersey Shore State Bank ranked first in the HMDA market, with 25% of the market share, followed by The Muncy Bank and Trust Company with 13% of the HMDA market, and PrimeLending, a Plains Capital Company with 9% of the HMDA market.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2021 small business and small farm data, there were 74 CRA reporters in the assessment area, originating or purchasing a total of 2,069 small business and small farm loans. C&N tied for eighth, with 4% of the market. The Muncy Bank and Trust Company led the market with 18 % of all small business and small farm originations and purchases, followed by American Express, N.B. with 16% of the market's total small business and small farm loan originations and purchases, and Synchrony Bank with 7% of the CRA market.

According to 2022 small business and small farm data, there were 69 CRA reporters in the assessment area, originating or purchasing a total of 1,924 small business and small farm loans. C&N ranked twelfth with less than 2% of the market. American Express, N.B. ranked first with 21% of the market, followed by Synchrony Bank with 12% of the market's total small business and small farm loan originations and purchases, and JP Morgan Chase Bank, N.A. with 11% of the CRA market.

Finally, according to 2023 small business and small farm data, there were 55 CRA reporters in the assessment area, originating or purchasing a total of 1,720 small business and small farm loans. C&N ranked twelfth with less than 2% of the market. American Express, N.B. once again ranked first with 24% of the market, followed by Synchrony Bank with 14% of the market's total small business and small farm loan originations and purchases, and JP Morgan Chase Bank, N.A. with 11% of the CRA market.

According to Moody's January 2024 Precis report, the Williamsport, PA MSA's economy is at risk. Though nonfarm payrolls have increased largely due to local government, manufacturing has been sluggish, and unfavorable demographics combined with a dearth of high-paying jobs endanger the area's long-term prospects, according to Moody's. Per Moody's, leading industries in the assessment area include education and health services (22%), manufacturing (15%), and government (13%). The top employers are Pennsylvania College of Technology, Primus Technologies Corporation, Lycoming Division, Wegman's Food Markets, Inc., and Brodart Company.

An interview was conducted with a community development representative to provide perspective on the credit and community development needs in the Williamsport, PA assessment area. This information was supplemented with demographic and economic data pertinent to the assessment area. The contact, who represented an economic development organization, identified infrastructure necessary for housing as an issue in the area. Additionally, the contact expressed concern about the unaffordability of child care in the area, noting its consequences on parents entering and staying in the workforce. Finally, the contact noted concern regarding the area's lack of population growth, and its potential impact on municipal funding and the workforce of the area's businesses.

Tables showing the assessment area demographics of the Williamsport, PA assessment area in 2021, 2022, and 2023 are contained on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Williamsport, PA Assessment Area Assessment Area Demographics 2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	6.9	1,264	4.3	472	37.3	5,920	20.0
Moderate-income	4	13.8	2,556	8.7	473	18.5	5,531	18.7
Middle-income	21	72.4	23,712	80.3	1,978	8.3	6,509	22.0
Upper-income	2	6.9	2,005	6.7	88	4.4	11,577	39.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	29	100.0	29,537	100.0	3,011	10.2	29,537	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,753	457	1.4	16.6	1,766	64.1	530	19.3
Moderate-income	6,080	2,331	7.2	38.3	2,698	44.4	1,051	17.3
Middle-income	40,446	27,130	84.2	67.1	8,409	20.8	4,907	12.1
Upper-income	3,362	2,269	7.2	67.5	846	25.2	247	7.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	52,641	32,187	100.0	61.1	13,719	26.1	6,735	12.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	232	4.7	193	4.3	38	9.8	1	0.9
Moderate-income	809	16.3	703	15.7	99	25.5	7	6.5
Middle-income	3,604	72.5	3,282	73.4	229	59.0	93	86.9
Upper-income	323	6.5	295	6.6	22	5.7	6	5.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,968	100.0	4,473	100.0	388	100.0	107	100.0
	Percentage of Total Businesses:			90.0		7.8		2.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	2	1.1	2	1.1	0	0.0	0	0.0
Middle-income	177	96.7	175	96.7	2	100.0	0	0.0
Upper-income	4	2.2	4	2.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	183	100.0	181	100.0	2	100.0	0	0.0
	Percentage of Total Farms:			98.9		1.1		0.0

2015 ACS Data and 2021 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Williamsport, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.1	966	3.2	480	49.7	5,846	19.5
Moderate-income	1	3.1	1,139	3.8	127	11.2	5,421	18.1
Middle-income	23	71.9	22,496	74.9	1,768	7.9	6,550	21.8
Upper-income	6	18.8	5,292	17.6	345	6.5	12,213	40.6
Unknown-income	1	3.1	137	0.5	71	51.8	0	0.0
Total Assessment Area	32	100.0	30,030	100.0	2,791	9.3	30,030	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,348	281	0.9	12.0	1,846	78.6	221	9.4
Moderate-income	2,791	639	2.0	22.9	1,517	54.4	635	22.8
Middle-income	39,105	24,843	78.5	63.5	8,649	22.1	5,613	14.4
Upper-income	8,834	5,811	18.4	65.8	2,265	25.6	758	8.6
Unknown-income	455	79	0.2	17.4	230	50.5	146	32.1
Total Assessment Area	53,533	31,653	100.0	59.1	14,507	27.1	7,373	13.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	164	3.4	143	3.3	20	5.2	1	1.0
Moderate-income	132	2.7	123	2.8	9	2.3	0	0.0
Middle-income	3,666	75.2	3,297	75.2	281	72.8	88	84.6
Upper-income	862	17.7	786	17.9	61	15.8	15	14.4
Unknown-income	52	1.0	37	0.8	15	3.9	0	0.0
Total Assessment Area	4,876	100.0	4,386	100.0	386	100.0	104	100.0
	Percentage of Total Businesses:			90.0		7.9		2.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	160	85.6	159	85.9	1	50.0	0	0.0
Upper-income	26	13.9	25	13.6	1	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	187	100.0	185	100.0	2	100.0	0	0.0
	Percentage of Total Farms:			98.9		1.1		0.0

2020 Census Data and 2022 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Williamsport, PA MSA Assessment Area Demographics 2023								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.1	966	3.2	480	49.7	5,846	19.5
Moderate-income	1	3.1	1,139	3.8	127	11.2	5,421	18.1
Middle-income	23	71.9	22,496	74.9	1,768	7.9	6,550	21.8
Upper-income	6	18.8	5,292	17.6	345	6.5	12,213	40.6
Unknown-income	1	3.1	137	0.5	71	51.8	0	0.0
Total Assessment Area	32	100.0	30,030	100.0	2,791	9.3	30,030	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,348	281	0.9	12.0	1,846	78.6	221	9.4
Moderate-income	2,791	639	2.0	22.9	1,517	54.4	635	22.8
Middle-income	39,105	24,843	78.5	63.5	8,649	22.1	5,613	14.4
Upper-income	8,834	5,811	18.4	65.8	2,265	25.6	758	8.6
Unknown-income	455	79	0.2	17.4	230	50.5	146	32.1
Total Assessment Area	53,533	31,653	100.0	59.1	14,507	27.1	7,373	13.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	164	3.3	143	3.2	20	5.1	1	1.0
Moderate-income	132	2.7	122	2.8	10	2.6	0	0.0
Middle-income	3,708	75.3	3,336	75.4	284	72.6	88	84.6
Upper-income	868	17.7	791	17.9	62	15.9	15	14.4
Unknown-income	50	1.0	35	0.7	15	3.8	0	0.0
Total Assessment Area	4,922	100.0	4,427	100.0	391	100.0	104	100.0
	Percentage of Total Businesses:			89.9		7.9		2.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	160	85.6	159	85.9	1	50.0	0	0.0
Upper-income	26	13.9	25	13.6	1	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	187	100.0	185	100.0	2	100.0	0	0.0
	Percentage of Total Farms:			98.9		1.1		0.0

2020 Census Data and 2023 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the Williamsport, PA assessment area was consistent with the lending, investment, and service performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

LENDING TEST

The bank's lending in the Williamsport, PA assessment area was consistent with the bank's lending in the full-scope assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans in the Williamsport, PA assessment area, home-mortgage loans were weighted more heavily in determining conclusions for the borrower and geographic distribution of lending. In total during the evaluation period, C&N originated 283 HMDA loans totaling \$43.7 million, and 135 small business loans totaling nearly \$16 million.

Borrower and Geographic Distribution of Loans

Home-Mortgage Lending

In 2021, C&N originated 111 HMDA loans aggregating just under \$19.5 million. The bank's lending to low-income borrowers (5%) was below both the level of aggregate lending to low-income borrowers (8%) and well below the proxy (20%). The bank's lending to moderate-income borrowers (16%) trailed slightly behind both the aggregate lending to moderate-income borrowers (19%), and proxy (19%). With respect to the geographic distribution of HMDA loans, the bank made no loans in low-income tracts, compared the aggregate lending levels (2%) and the proxy (1%). In moderate-income tracts, the bank's lending (1%) was below both the aggregate lending levels (8%) and proxy (7%).

During 2022, C&N originated 108 HMDA loans aggregating just under \$17.4 million. The bank's lending to low-income borrowers (8%) was just below the level of aggregate lending to low-income borrowers (9%) and both were well below the proxy (20%). The bank's lending to moderate-income borrowers (21%) trailed just behind the aggregate lending to moderate-income borrowers (23%), but was above proxy (18%). With respect to the geographic distribution of HMDA loans, the bank made 1% of its loans in low-income tracts, which was below the aggregate lending level (2%), but matched the proxy (1%). In moderate-income tracts, the bank's lending (1%) was below both the aggregate lending levels (4%) and proxy (2%).

Finally, during 2023, C&N originated 64 HMDA loans aggregating just under \$6.9 million. The bank's lending to low-income borrowers (9%) was above the level of aggregate lending to low-income borrowers (7%), but below the proxy (20%). The bank's lending to moderate-income borrowers (17%) trailed behind both the aggregate lending to moderate-income borrowers (22%), and the proxy (18%). With respect to the geographic distribution of HMDA loans, the bank made just under 2% of its loans in low-income tracts, which matched the aggregate lending level (2%), and just surpassed the proxy (1%). In moderate-income tracts, the bank's lending (3%) was just below both the aggregate lending levels (4%), but above the proxy (2%).

Small Business Lending

During 2021, C&N originated 83 small business loans, aggregating \$9.4 million. Of these loans, 70% were originated to small businesses, which exceeded aggregate lending of 47% to small businesses by all lenders in the assessment area, but was below the proxy of 90%. Of the bank's small business loans originated in the assessment area, 70% were in an amount of \$100 thousand or less, compared to the aggregate lending levels of 89%. With respect to the geographic distribution of small business loans, the bank made 5% of its loans in low-income tracts, above aggregate lending (4%) and matching proxy (5%). In moderate-income tracts, the bank's lending (11%) was below aggregate lending (14%) and proxy (16%).

During 2022, C&N originated 26 small business loans, aggregating \$2.2 million. Of these loans, 81% were originated to small businesses, which exceeded aggregate lending (55%) to small businesses by all lenders in the assessment area, but trailed the proxy (90%). Of the small business loans originated in the assessment area, 69% were in an amount of \$100 thousand or less, compared to the aggregate lending level of 93%. With respect to the geographic distribution of small business loans, the bank made 12% of its loans in low-income tracts, well above both aggregate lending (3%) and proxy (3%). The bank made no small business loans in moderate-income tracts, which was below aggregate lending (2%) and proxy (3%).

Finally, during 2023, C&N originated 26 small business loans, aggregating \$4.3 million. Of these loans, 65% were originated to small businesses, which exceeded aggregate lending to small businesses by all lenders in the assessment area (56%), but was well below the proxy (90%). Of the small business loans originated in the assessment area, 65% were in an amount of \$100 thousand or less, compared to the aggregate lending level of 94%. With respect to the geographic distribution of small business loans, the bank made 4% of its loans in low-income tracts, above both aggregate lending (2%) and proxy (3%). The bank made no loans in moderate-income census tracts, which was below aggregate lending and proxy (both 3%).

Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed earlier, the bank meets the needs of low- and moderate-income individuals and families by offering several alternative mortgage products. In an effort to address the credit needs of such borrowers in the Williamsport, PA assessment area, C&N originated three of its in-house First-Time Homebuyer loans totaling \$486 thousand, and one Emergency Loan Relief Program loan totaling \$10 thousand. Additionally, the bank originated nine loans totaling \$1.6 million through government programs. More specifically, the bank originated two FHA loans totaling \$433 thousand, two VA loans totaling \$356 thousand, three Fannie Mae HomeReady loans totaling \$390 thousand, and two PHFA loans totaling \$439 thousand. Finally, closing cost assistance was provided to two borrowers through the FHLB of Pittsburgh's First Front Door program.

To address the credit needs of small businesses in the assessment area, C&N participates in SBA and FHLB of Pittsburgh loan programs. Within the Williamsport, PA assessment area, the bank made one SBA 504 loan totaling \$170 thousand, and one FHLB of Pittsburgh Banking on Business loan totaling \$140 thousand.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Finally, as indicated in the following table, during the period evaluated, the bank made three community development loans totaling almost \$2.1 million. Of the dollar amount, 90% supported revitalization or stabilization efforts in the assessment areas, and 10% supported affordable housing. Of the bank’s overall community development lending, 3% by dollar amount was in the Williamsport, PA assessment area.

Citizens & Northern Bank Williamsport, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2022	1	214	0	0	0	0	2	1,875	3	2,089
2023	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	0	0	0	0	0	0
TOTAL	1	214	0	0	0	0	2	1,875	3	2,089

INVESTMENT TEST

The bank’s investment performance in the Williamsport, PA assessment area was consistent with the bank’s investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments and donations in the Williamsport, PA assessment area totaled \$2.5 million. This represents an increase from the \$1.1 million in qualified investments in this assessment area at the previous evaluation. Of the bank’s total investments and donations, 8% were within the Williamsport, PA assessment area.

C&N made 10 qualified investments totaling \$2.4 million in the Williamsport, PA assessment area. Of these, five investments totaling almost \$747 thousand (31%) supported activities focused on affordable housing, four investments totaling almost \$1.4 million (58%) supported community services, and one investment totaling \$265 thousand (11%) supported revitalization and stabilization efforts in the assessment area. In addition to the qualified investments, C&N made 17 donations totaling \$119.6 thousand. Of the donations, 92% supported activities focused on community services, and 8% supported revitalization and stabilization efforts.

The following table presents investment and donation activity for the Williamsport, PA assessment area.

Citizens & Northern Bank Williamsport, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	5	747	4	1,387	0	0	1	265	10	2,399
Donations	0	0	16	110	0	0	1	10	17	120
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	5	747	20	1,497	0	0	2	275	27	2,519

SERVICE TEST

The bank's service test performance in the Williamsport, PA assessment area was consistent with the bank's service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

The bank operated five branches in the assessment area (19% of the bank's total branches). Using 2015 ACS data, one branch (20%) was located in a moderate-income tract, and four (80%) were located in middle-income tracts. Using 2020 Census data, four branches were located in middle-income tracts (80%), and one was located in an upper-income tract (20%). Four of the five branches in the assessment area include ATMs on location.¹⁵ All five branches in the assessment area offer drive-through services, and the bank's South Williamsport (upper-income) branch exclusively offers drive-through services due to physical limitations. Two of the bank's branches offer Saturday morning hours.¹⁶

¹⁵ There is no ATM at the Williamsport (middle-income) branch.

¹⁶ Saturday hours are not offered at the Jersey Shore (middle-income), South Williamsport (upper-income), and Williamsport (middle-income) branches.

YORK, PA ASSESSMENT AREA
LIMITED-SCOPE REVIEW

A limited-scope review of the bank’s performance in the York, PA assessment area was conducted during the current evaluation. It is noted that the York, PA assessment area was established by the bank in October 2021, just prior to the previous CRA evaluation. However, performance in this assessment area was not evaluated at that time due to the limited loan activity and time in the assessment area. For the purposes of assessing C&N’s performance in the Commonwealth of Pennsylvania, the York, PA assessment area was given the second least amount of weight, given the bank’s volumes of loans, deposits, and operations in this assessment area. More specifically, during the evaluation period, lending activity in the York, PA assessment area represented 1% of loans by number, and under 2% of loans by dollar volume. The assessment area’s one branch (4% of total branches) held \$26.7 million in deposits, or just over 1% of the bank’s total deposits as of June 30, 2024.

The bank’s performance in the York, PA assessment area was below its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the tables located in the appendices accompanying this report. Conclusions regarding performance are as follows:

ASSESSMENT AREA	LENDING TEST	INVESTMENT TEST	SERVICE TEST
York, PA Assessment Area	Below	Below	Consistent

DESCRIPTION OF INSTITUTION’S OPERATIONS

The bank’s York, PA assessment area consists of the entirety of York County, which comprises the York-Hanover, PA MSA.

According to 2015 ACS data, the York, PA assessment area consisted of 90 census tracts, 13 of which were designated as low-income (14%), seven of which were moderate-income (8%), 55 of which were middle-income (61%), and 15 of which were upper-income (17%).

According to the 2020 Census data, there were 108 census tracts in the assessment area, 11 of which were designated as low-income (10%), 11 of which were moderate-income (10%), 67 of which were middle-income (62%), and 19 of which were upper-income (18%).

Maps of the York, PA assessment area according to the 2015 ACS, and the 2020 Census are located in Appendix F.

C&N’s performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC’s Deposit Market Share Report, as of June 30, 2024, there were 16 depository institutions operating in the bank’s York, PA assessment area. These institutions maintained a total of 100 branches, holding \$9.8 billion in deposits. C&N, with one branch in the assessment area, ranked thirteenth, with \$26.7 million, or less than 1% of the deposit market.

Manufacturers and Traders Trust Company ranked first with 25 branches holding \$2.7 billion in deposits (28% of the market), followed by PeoplesBank, a Cordorus Valley Company with 15 branches and \$1.5 billion in deposits (15% of the market), and Fulton Bank, N.A. with 10 branches and \$1.2 billion in deposits (nearly 13% of the market).

C&N reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2021, a total of 477 institutions reported 25,561 HMDA loan originations and purchases within the assessment area. C&N tied for one hundred-and-eighth place in the HMDA market with less than 1% HMDA originations and purchases. Rocket Mortgage, LLC ranked first in the HMDA market, with just under 7% market share, followed by Members 1st Federal Credit Union with 6% of the market, and York Traditions Bank with 5% of the HMDA market.

The 2022 aggregate HMDA data showed a 34% decrease in overall HMDA lending, with 462 lenders originating and purchasing 16,852 home-mortgage loans in the assessment area. C&N tied eighty-ninth in the HMDA market with less than 1% originations and purchases. Members 1st Federal Credit Union led the HMDA market, with 9% of the HMDA market, followed by Traditions Bank with 6% of the HMDA market, and Manufacturers and Traders Trust Company with 4% of the HMDA market.

Finally, 2023 aggregate HMDA data once again showed a 28% decrease in overall HMDA lending, with 392 lenders originating and purchasing 12,202 home-mortgage loans in the assessment area. C&N tied for seventy-fourth place in the HMDA market with less than 1% total originations and purchases. Members 1st Federal Credit Union ranked first in the HMDA market, with 11% market share, followed by Traditions Bank with 6% of the HMDA market, and Manufacturers and Traders Trust Company with 4% of the HMDA market.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2021 small business and small farm data, there were 101 CRA reporters in the assessment area, originating or purchasing a total of 8,533 small business and small farm loans. C&N ranked thirty-fourth, with less than 1% of the market. American Express, N.B. led the market with 16 % of all small business and small farm originations and purchases, followed by US Bank, N.A. with just over 8% of the market, and JP Morgan Chase Bank, N.A. with 8% of the CRA market.

According to 2022 small business and small farm data, there were 101 CRA reporters in the assessment area, originating or purchasing a total of 8,195 small business and small farm loans. C&N tied for thirty-fifth place, with less than 1% of the market. American Express, N.B. ranked first with 20% of all small business and small farm originations and purchases, followed by US Bank, N.A. with 12% of the market, and JP Morgan Chase Bank, N.A. also with 12% of the CRA market.

Finally, according to 2023 small business and small farm data, there were 101 CRA reporters in the assessment area, originating or purchasing a total of 7,324 small business and small farm loans. C&N tied for thirty-seventh place, with less than 1% of the market. American Express, N.B. ranked

first with 23 % of all small business and small farm originations and purchases, followed by JP Morgan Chase Bank, N.A. with 14% of the market's total small business and small farm loan originations and purchases, and US Bank, N.A. with 10% of the CRA market.

According to Moody's January 2024 Precis report, the York, PA assessment area is in a late expansion mode, with employment numbers exceeding both state and nationwide performance, boosted by employment gains in manufacturing, logistics, and education and healthcare areas. Per Moody's, the York, PA MSA's leading industries are manufacturing (17%), education and health services (15%), and retail trade and government (both 10%). Top employers include WellSpan Medical Group, Rutter's Holdings, Inc., Stewart Group, Inc., Kinsley Construction, Inc., and Spiritrust Lutheran.

An interview was conducted with a community development representative to provide perspective on the credit and community development needs in the York, PA assessment area. This information is supplemented with demographic and economic data pertinent to the assessment area. The contact, who represented an economic development organization, identified affordable housing as a need in the area, and noted that residential mortgage programs tailored to low- and moderate-income individuals are difficult to come by. Additionally, the community contact mentioned that economic conditions for businesses are grim, with many small businesses closing. The contact indicated that new businesses are in need of financing as they are getting off the ground.

Tables showing the assessment area demographics of the York, PA assessment area in 2021, 2022, and 2023 are contained on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank York, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	10.2	5,905	4.9	1,861	31.5	21,441	18.0
Moderate-income	11	10.2	9,132	7.7	884	9.7	22,623	19.0
Middle-income	67	62.0	80,081	67.1	3,179	4.0	28,747	24.0
Upper-income	19	17.6	24,184	20.3	887	3.7	46,491	39.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	108	100.0	119,302	100.0	6,811	5.7	119,302	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,603	3,583	2.7	28.4	7,608	60.4	1,412	11.2
Moderate-income	16,464	8,751	6.7	53.2	6,457	39.2	1,256	7.6
Middle-income	122,540	90,158	69.1	73.6	25,732	21.0	6,650	5.4
Upper-income	33,289	28,032	21.5	84.2	4,104	12.3	1,153	3.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	184,896	130,524	100.0	70.6	43,901	23.7	10,471	5.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,197	6.9	1,057	6.6	130	10.1	10	4.6
Moderate-income	1,531	8.8	1,359	8.5	150	11.6	22	10.0
Middle-income	11,372	65.3	10,439	65.6	775	60.0	158	72.1
Upper-income	3,324	19.0	3,058	19.3	237	18.3	29	13.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	17,424	100.0	15,913	100.0	1,292	100.0	219	100.0
	Percentage of Total Businesses:			91.3		7.4		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.5	2	0.5	0	0.0	0	0.0
Moderate-income	19	4.3	19	4.4	0	0.0	0	0.0
Middle-income	363	82.9	359	82.9	4	80.0	0	0.0
Upper-income	54	12.3	53	12.2	1	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	438	100.0	433	100.0	5	100.0	0	0.0
	Percentage of Total Farms:			98.9		1.1		0.0

2020 Census Data and 2022 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank York, PA Assessment Area Assessment Area Demographics 2023								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	10.2	5,905	4.9	1,861	31.5	21,441	18.0
Moderate-income	11	10.2	9,132	7.7	884	9.7	22,623	19.0
Middle-income	67	62.0	80,081	67.1	3,179	4.0	28,747	24.1
Upper-income	19	17.6	24,184	20.3	887	3.7	46,491	39.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	108	100.0	119,302	100.0	6,811	5.7	119,302	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,603	3,583	2.7	28.4	7,608	60.4	1,412	11.2
Moderate-income	16,464	8,751	6.7	53.2	6,457	39.2	1,256	7.6
Middle-income	122,540	90,158	69.1	73.6	25,732	21.0	6,650	5.4
Upper-income	33,289	28,032	21.5	84.2	4,104	12.3	1,153	3.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	184,896	130,524	100.0	70.6	43,901	23.7	10,471	5.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1,223	6.9	1,087	6.7	126	9.6	10	4.6
Moderate-income	1,553	8.8	1,376	8.5	155	11.8	22	10.0
Middle-income	11,546	65.1	10,586	65.3	802	60.9	158	72.1
Upper-income	3,415	19.2	3,152	19.5	234	17.7	29	13.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	17,737	100.0	16,201	100.0	1,317	100.0	219	100.0
	Percentage of Total Businesses:			91.3		7.4		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	19	4.3	18	4.1	1	16.7	0	0.0
Middle-income	367	83.4	363	83.6	4	66.7	0	0.0
Upper-income	53	12.1	52	12.1	1	16.6	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	440	100.0	434	100.0	6	100.0	0	0.0
	Percentage of Total Farms:			98.6		1.4		0.0

2020 Census Data and 2023 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the York, PA assessment area is below the lending and investment performance, and consistent with the service performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

LENDING TEST

The bank's lending in the York, PA assessment area was below the bank's lending in the full-scope assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans in the York, PA assessment area, small business loans were weighted more heavily in determining conclusions for the borrower and geographic distribution of lending. It is noted that very little lending took place in the assessment area during the review period, and this fact was fundamental in determining a conclusion for lending test performance. More specifically, over the three years included in the evaluation, the bank only made 26 small business loans totaling \$7.2 million, and 15 HMDA loans totaling \$3.6 million.

Borrower and Geographic Distribution of Lending

Small Business Lending

During 2021, C&N originated 15 small business loans, aggregating \$4 million. Of these loans, 67% (ten loans) were originated to small businesses, which was above the aggregate lending of 49%, but was below the proxy of 91%. Of the 15 small business loans originated in the assessment area, 33% were in an amount of \$100 thousand or less, compared to the aggregate lending levels of 90%. With respect to the geographic distribution of small business loans, the bank made none of its loans in low-income tracts, below both aggregate lending (8%) and proxy (9%). Similarly, the bank made no small business loans in moderate-income tracts, below aggregate lending (6%) and proxy (nearly 7%).

During 2022, C&N only originated eight small business loans, aggregating \$2.4 million. Of these loans, 50% (four loans) were originated to small businesses, which was below aggregate lending (55%) to small businesses by all lenders in the assessment area, and was well below the proxy (91%). Of the eight small business loans originated in the assessment area, 50% were in an amount of \$100 thousand or less, compared to the aggregate lending levels (94%). With respect to the geographic distribution of small business loans, the bank made none of its loans in low-income tracts, below both aggregate lending (5%), and proxy (7%). Similarly, the bank made no loans in moderate-income tracts, which was below aggregate lending and proxy (both 9%).

Finally, during 2023, C&N originated only three small business loans, aggregating \$800 thousand. Of these loans, 67% (two loans) were originated to small businesses, which was above aggregate lending (56%) to small businesses by all lenders in the assessment area, but was well below the proxy (91%). Of the three small business loans originated in the assessment area, 67% were in an amount of \$100 thousand or less, compared to the aggregate lending levels (91%).

With respect to the geographic distribution of small business loans, the bank made none of its loans in low-income tracts, below both aggregate lending (6%), and proxy (7%). Similarly, no loans were made in moderate-income tracts, which was below aggregate lending (8%) and proxy (9%).

Home-Mortgage Lending

During 2021, C&N originated only three HMDA loans aggregating \$764 thousand. The bank's lending to low-income borrowers (33% or one loan) was above both the level of aggregate lending to low-income borrowers (7%) and the proxy (19%). The bank made no loans to moderate-income borrowers, which was below both the aggregate lending to moderate-income borrowers (19%), and proxy (18%). With respect to the geographic distribution of HMDA loans, the bank made no HMDA loans in low-income tracts, compared to the aggregate lending level (3%) and the proxy (3%). In moderate-income tracts, the bank's lending (33% or one loan) was above both the aggregate lending levels (5%) and proxy (6%).

During 2022, C&N originated only six HMDA loans aggregating just under \$2.0 million. The bank's lending to low-income borrowers (17% or one loan) was above the level of aggregate lending to low-income borrowers (10%) but below the proxy (18%). The bank made no loans to moderate-income borrowers, which was below the aggregate lending to moderate-income borrowers (22%) and the proxy (19%). With respect to the geographic distribution of HMDA loans, the bank made 17% of its loans (one loan) in a low-income tract, compared to the aggregate lending levels (4%), and the proxy (3%). The bank made no loans in moderate-income tracts, compared to the aggregate lending level and proxy, both of which were 7%.

Finally, during 2023, C&N originated only six HMDA loans aggregating \$871 thousand. The bank's lending to low-income borrowers (17% or one loan) was above the level of aggregate lending to low-income borrowers (9%) and below the proxy (18%). The bank's lending to moderate-income borrowers (17% or one loan) trailed behind the aggregate lending to moderate-income borrowers (22%) and the proxy (19%). With respect to the geographic distribution of HMDA loans, the bank made 17% (one loan) in a low-income tract, compared to the aggregate lending level (5%), and the proxy (3%). In moderate-income tracts, the bank made no loans, which was below both the aggregate lending level (8%), and the proxy (7%).

Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed earlier, the bank helps to meet the credit needs of low- and moderate-income mortgage borrowers by offering a variety of alternative mortgage products throughout its assessment areas. However, no such loans were originated in the York, PA assessment area during the review period.

Similarly, to help meet the credit needs of small businesses, C&N participates in SBA loan programs. While the bank makes such loans in other assessment areas, the bank made no such loans in the York, PA assessment area.

Finally, during the period evaluated, the bank made no community development loans in the York, PA assessment area.

INVESTMENT TEST

The bank's investment performance in this assessment area was below the bank's investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments and donations in the York, PA assessment area totaled just under \$1.6 million. Of the bank's total investments and donations, 5% were within the York, PA assessment area.

C&N made five qualified investments totaling \$1.5 million in the Lancaster, PA assessment area. Each investment supported affordable housing efforts in the assessment area. In addition to the qualified investments, C&N made eight donations totaling \$50 thousand, each of which focused on community services in the assessment area.

The following table presents investment and donation activity for the York, PA assessment area.

Citizens & Northern Bank York, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	5	1,504	0	0	0	0	0	0	5	1,504
Donations	0	0	8	50	0	0	0	0	8	50
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	5	1,504	8	50	0	0	0	0	13	1,554

SERVICE TEST

The bank's service performance in the York, PA assessment area was consistent with the bank's service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

The bank operated one branch in the assessment area (4% of the bank's total branches). Using both 2015 ACS and 2020 Census data, the bank's single branch was located in a middle-income census tract. The bank's one branch in the assessment area is open Monday through Friday from 9:00 AM to 1:00 PM, and has no Saturday hours, nor an on-site ATM.

In addition to retail services, bank staff provided a handful of financial literacy presentations in the assessment area targeted to low- and moderate-income individuals and geographies. Finally, consistent with other assessment areas, the bank participates as an intermediary for the FHLB of Pittsburgh's "Home4Good Initiative." In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to FHLB of Pittsburgh, on their behalf. During the review period, the bank assisted in bringing \$84.0 thousand in support from this program.

LANCASTER, PA ASSESSMENT AREA
LIMITED-SCOPE REVIEW

A limited-scope review of the bank’s performance in the Lancaster, PA assessment area was conducted at the current CRA evaluation. It is noted that the Lancaster, PA assessment area was established by the bank in January 2022, immediately prior to the previous CRA evaluation. However, performance in this assessment area was not evaluated at that time due to the very short amount of time in the area. For the purposes of assessing C&N’s performance in the Commonwealth of Pennsylvania, and overall, the Lancaster, PA assessment area was given the lowest amount of weight, given the bank’s volumes of loans, deposits, and operations in this assessment area. More specifically, during the evaluation period, lending activity in the Lancaster, PA assessment area represented 1% of loans by number, and less than 2% of loans by dollar volume. The assessment area’s one branch (4% of total branches) held \$7.4 million in deposits, or less than 1% of the bank’s total deposits as of June 30, 2024.

The bank’s performance in the Lancaster, PA assessment area was below its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the tables located in the appendices accompanying this report. Conclusions regarding performance are as follows:

ASSESSMENT AREA	LENDING TEST	INVESTMENT TEST	SERVICE TEST
Lancaster, PA Assessment Area	Below	Consistent	Below

DESCRIPTION OF INSTITUTION’S OPERATIONS

The bank’s Lancaster, PA assessment area consists of the entirety of Lancaster County, which comprises the Lancaster, PA MSA.

According to 2015 ACS data, the Lancaster, PA assessment area consisted of 98 census tract, six of which were designated as low-income (6%), 14 of which were moderate-income (14%), 67 of which were middle-income (68%), and 11 of which were upper-income (11%).

According to the 2020 Census data, there were 116 census tracts in the assessment area, four of which were designated as low-income (3%), 16 of which were moderate-income (14%), 81 of which were middle-income (70%), 15 of which were upper-income (13%).

Maps of the Lancaster, PA assessment area reflecting 2015 ACS and 2020 Census data are located in Appendix F.

C&N’s performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC’s Deposit Market Share Report, as of June 30, 2024, there were 24 depository institutions operating in the bank’s Lancaster, PA assessment area. These

institutions maintained a total of 147 branches, holding \$17.1 billion in deposits. C&N, with one branch in the assessment area, ranked twenty-third, with \$7.4 million, or less than 1% of the deposit market.

Fulton Bank, N.A. ranked first with 20 branches holding \$5.0 billion in deposits (29% of the market), followed by Truist Bank with 19 branches and \$2.7 billion in deposits (16% of the market), and PNC Bank, N.A. with 13 branches and \$1.6 billion in deposits (10% of the market).

C&N reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2021, a total of 484 institutions reported 24,700 HMDA loan originations and purchases within the assessment area. C&N tied for one hundred-and-second in the HMDA market with less than 1% total originations and purchases. Rocket Mortgage, LLC led the HMDA market, with 7% market share, followed by Fulton Bank, N.A. also with almost 7% of the market share, and Wells Fargo Bank, N.A. with 5% of the HMDA market.

The 2022 aggregate HMDA data showed a 36% decrease in overall HMDA lending, with 406 lenders originating and purchasing 15,904 home-mortgage loans in the assessment area. C&N tied for eighty-seventh in the HMDA market with less than 1% total originations and purchases. Members 1st Federal Credit Union ranked first in the HMDA market, with 9% of the market share, followed by Fulton Bank, N.A. with 7% of the HMDA market, and The Ephrata National Bank with 6% of the HMDA market.

Finally, the 2023 aggregate HMDA data once again showed a 32% decrease in overall HMDA lending, with 361 lenders originating and purchasing 10,879 home-mortgage loans in the assessment area. C&N tied for sixty-sixth in the HMDA market with less than 1% total originations and purchases. Members 1st Federal Credit Union ranked first in the HMDA market, with 9% of the market share, followed by Fulton Bank, N.A. with 7% of the HMDA market, and The Ephrata National Bank with 6% of the HMDA market.

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2021 small business and small farm data, there were 141 CRA reporters in the assessment area, originating or purchasing a total of 14,798 small business and small farm loans. C&N tied for fifty-first, with less than 1% of the market. American Express, N.B. ranked first with 11% of all small business and small farm originations and purchases, followed by US Bank, N.A. with 9% of the market, and JP Morgan Chase Bank, N.A. with 8% of the CRA market.

According to 2022 small business and small farm data, there were 116 CRA reporters in the assessment area, originating or purchasing a total of 13,345 small business and small farm loans. C&N tied for forty-third, with less than 1% of the market. American Express, N.B. led the market with 14% of all small business and small farm originations and purchases, followed by US Bank, N.A. with 13% of the market's total small business and small farm loan originations and purchases, and JP Morgan Chase Bank, N.A. with almost 13% of the CRA market.

Finally, according to 2023 small business and small farm data, there were 99 CRA reporters in the assessment area, originating or purchasing a total of 11,584 small business and small farm loans. C&N tied for forty-first, with less than 1% of the market. American Express, N.B. ranked first with 16% of all small business and small farm originations and purchases, followed by JP Morgan Chase Bank, N.A. with just under 16% of the market, and US Bank, N.A. with 11% of the CRA market.

According to Moody's January 2024 Precis report, the Lancaster, PA MSA's economy is mid-expansion mode. The area has experienced employment growth that outpaces both the state and nation, led by growth in leisure/hospitality and healthcare. Per Moody's, leading industries in the assessment area include education and health services (18%), manufacturing (14%), and retail trade (12%). The top employers in the MSA are Lancaster General Hospital, Giant Food Stores, LLC, and Eurofins Lancaster Laboratories Incorporated.

An interview was conducted with a community development representative to provide perspective on the credit and community development needs in the Lancaster, PA assessment area. This information is supplemented with demographic and economic data pertinent to the assessment area. The contact, who represented a community organization, identified affordable housing as a need in the area, particularly for areas of Lancaster that are being gentrified, and pushing low- and moderate-income individuals and the elderly out, due to rising housing costs. According to the contact, immigrants and individuals of color are most in need of credit, with language barriers often hindering access to credit. Finally, existing businesses are struggling, as they often do not have access to the same resources that new businesses do.

Tables showing the assessment area demographics of the Lancaster, PA assessment area in 2021, 2022, and 2023 are contained on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Lancaster, PA Assessment Area Assessment Area Demographics 2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.1	6,108	5.9	31,628	23.1
Upper-income	11	11.2	17,305	12.6	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	98	100.0	137,133	100.0	9,994	7.3	137,133	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	8,182	2,131	1.6	26	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	76.1	68.7	40,099	26.9	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	205,587	134,548	100.0	65.4	60,782	29.6	10,257	5.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	968	3.9	877	3.9	83	3.9	8	3.0
Moderate-income	2,684	10.8	2,374	10.6	283	13.4	27	10.0
Middle-income	18,268	73.6	16,555	73.8	1,508	71.4	205	75.9
Upper-income	2,887	11.7	2,620	11.7	237	11.3	30	11.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	24,807	100.0	22,426	100.0	2,111	100.0	270	100.0
	Percentage of Total Businesses:			90.4		8.5		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	7	0.7	7	0.7	0	0.0	0	0.0
Middle-income	933	90.7	899	90.5	34	94.4	0	0.0
Upper-income	87	8.4	85	8.6	2	5.6	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,029	100.0	993	100.0	36	100.0	0	0.0
	Percentage of Total Farms:			96.5		3.5		0.0

2015 ACS Data and 2021 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Lancaster, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	3.4	3,695	2.6	954	25.8	24,856	17.4
Moderate-income	16	13.8	18,133	12.7	1,596	8.8	27,588	19.3
Middle-income	81	69.9	102,368	71.5	5,050	4.9	35,138	24.6
Upper-income	15	12.9	18,905	13.2	489	2.6	55,519	38.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	116	100.0	143,101	100.0	8,089	5.7	143,101	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,072	2,110	1.5	34.7	3,528	58.1	434	7.1
Moderate-income	29,484	15,940	11.3	54.1	12,187	41.3	1,357	4.6
Middle-income	150,455	102,629	72.5	68.2	42,353	28.1	5,473	3.6
Upper-income	26,149	20,826	14.7	79.6	4,430	16.9	893	3.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	212,160	141,505	100.0	66.7	62,498	29.5	8,157	3.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	867	3.5	775	3.5	86	4.2	6	2.2
Moderate-income	2,618	10.6	2,390	10.7	197	9.6	31	11.4
Middle-income	17,405	70.7	15,789	70.8	1,419	69.3	197	72.4
Upper-income	3,740	15.2	3,355	15.9	347	16.9	38	14.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	24,630	100.0	22,309	100.0	2,049	100.0	272	100.0
	Percentage of Total Businesses:			90.6		8.3		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	95	9.2	91	9.2	4	10.8	0	0.0
Middle-income	812	78.8	783	78.8	29	78.4	0	0.0
Upper-income	122	11.8	118	11.8	4	10.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,031	100.0	994	100.0	37	100.0	0	0.0
	Percentage of Total Farms:			96.4		3.6		0.0

2020 Census Data and 2022 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank Lancaster, PA Assessment Area Assessment Area Demographics 2023								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	3.4	3,695	2.6	954	25.8	24,856	17.4
Moderate-income	16	13.8	18,133	12.7	1,596	8.8	27,588	19.3
Middle-income	81	69.9	102,368	71.5	5,050	4.9	35,138	24.6
Upper-income	15	12.9	18,905	13.2	489	2.5	55,519	38.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	116	100.0	143,101	100.0	8,089	5.7	143,101	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,072	2,110	1.5	34.7	3,528	58.1	434	7.1
Moderate-income	29,484	15,940	11.3	54.1	12,187	41.3	1,357	4.6
Middle-income	150,455	102,629	72.5	68.2	42,353	28.1	5,473	3.6
Upper-income	26,149	20,826	14.7	79.6	4,430	16.9	893	3.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	212,160	141,505	100.0	66.7	62,498	29.5	8,157	3.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	879	3.5	788	3.5	85	4.2	6	2.2
Moderate-income	2,647	10.6	2,419	10.7	199	9.9	29	10.9
Middle-income	17,582	70.6	16,002	70.7	1,386	69.1	194	72.7
Upper-income	3,809	15.3	3,436	15.1	335	16.8	38	14.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	24,917	100.0	22,645	100.0	2,005	100.0	267	100.0
	Percentage of Total Businesses:			90.9		8.0		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	98	9.3	94	9.3	4	10.8	0	0.0
Middle-income	827	78.7	798	78.7	29	78.4	0	0.0
Upper-income	124	11.8	120	11.8	4	10.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,051	100.0	1,014	100.0	37	100.0	0	0.0
	Percentage of Total Farms:			96.5		3.5		0.0

2020 Census Data and 2023 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the Lancaster, PA assessment area was below both the lending and investment performance, and consistent with the service performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

LENDING TEST

The bank's lending in the Lancaster, PA assessment area was below the bank's lending in the full-scope assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans in the Lancaster, PA assessment area, small business loans were weighted more heavily in determining conclusions for the borrower and geographic distribution of lending. It is noted that the bank did very little lending in the assessment area during the review period, and this fact was fundamental in determining a conclusion for lending test performance. More specifically, in the three years included in the evaluation, the bank only made 24 small business loans totaling \$8 million, and 16 HMDA loans totaling \$2.8 million.

Borrower and Geographic Distribution of Lending

Small Business Lending

During 2021, C&N originated only six small business loans, aggregating almost \$1.4 million. Of these loans, 33% (two loans) were originated to small businesses, which was below aggregate lending of 51% to small businesses by all lenders in the assessment area, and was well below the proxy of 90%. Of the six small business loans originated in the assessment area, 33% (two loans) were in amount of \$100 thousand or less, compared to the aggregate lending levels of 88%. With respect to the geographic distribution of small business loans, the bank made no loans in low-income tracts, below both aggregate lending (4%) and proxy (4%). In moderate-income tracts, the bank's lending of 17% (one loan) was above aggregate lending (10%) and proxy (11%).

During 2022, C&N originated only seven small business loans, aggregating \$3.5 million. Of these loans, 43% (three loans) were originated to small businesses, which was below aggregate lending (55%) to small businesses by all lenders in the assessment area, and was well below the proxy (91%). Of the seven small business loans originated in the assessment area, 14% (one loan) were in amount of \$100 thousand or less, compared to the aggregate lending levels (91%). With respect to the geographic distribution of small business loans, the bank made no small business loans in low-income tracts, below both aggregate lending (3%) and proxy (4%). Similarly, the bank made no loans in moderate-income tracts, below aggregate lending (10%) and proxy (11%).

Finally, during 2023, C&N originated 11 small business loans, aggregating \$3.2 million. Of these loans, 46% (five loans) were originated to small businesses, which was below aggregate lending (56%) to small businesses by all lenders in the assessment area, and was well below the proxy (91%). Of the 11 small business loans originated in the assessment area, 27% (three loans) were in an amount of \$100 thousand or less, compared to the aggregate lending levels (92%).

With respect to the geographic distribution of small business loans, the bank made 27% of its loans (three loans) in low-income tracts, above both aggregate lending (3%) and proxy (4%). In moderate-income tracts, the bank's lending of 9% (one loan) was below aggregate lending (11%) and proxy (11%).

Home-Mortgage Lending

During 2021, C&N originated only two HMDA loans aggregating \$214 thousand. The bank made no loans to low-income borrowers, below both the level of aggregate lending to low-income borrowers (7%) and the proxy (18%). Similarly, no loans were made to moderate-income borrowers, below both the aggregate lending to moderate-income borrowers (21%), and proxy (19%). With respect to the geographic distribution of HMDA loans, the bank made 50% of its loans (one loan) in a low-income tract, compared to the aggregate lending levels (2%) and the proxy (2%). In moderate-income tracts, the bank made no loans, which was below both the aggregate lending levels (10%) and proxy (9%).

During 2022, C&N originated only four HMDA loans aggregating \$967 thousand. No HMDA loans were made to low-income borrowers, which was below the level of aggregate lending to low-income borrowers (8%), and below the proxy (17%). Similarly, the bank made no loans to moderate-income borrowers, which was below the aggregate lending to moderate-income borrowers (22%) and the proxy (19%). With respect to the geographic distribution of HMDA loans, the bank made 25% of its loans (one loan) in low-income tracts, compared to aggregate lending levels of 2%, and the proxy of 2%. The bank made 50% of loans (two loans) in moderate-income tracts, compared to the aggregate lending levels of 13%, and proxy of 11%.

Finally, during 2023, C&N originated 10 HMDA loans aggregating \$1.6 million. No HMDA loans were made to low-income borrowers, which was below the level of aggregate lending to low-income borrowers (7%) and the proxy (17%). The bank's lending to moderate-income borrowers of 20.0% (two loans) trailed the aggregate lending to moderate-income borrowers (23%), but was above the proxy (19%). With respect to the geographic distribution of HMDA loans, the bank made none its loans in low-income tracts, compared the aggregate lending levels of 3%, and the proxy of 2%. In moderate-income tracts, the bank's lending of 20.0% (two loans) was above both the aggregate lending level of 14%, and the proxy of 11%.

Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed earlier, the bank helps to meet the credit needs of low- and moderate-income mortgage borrowers by offering a variety of alternative mortgage products throughout its assessment areas. During the review period C&N originated one C&N First Time Homebuyer loan totaling \$214.7 thousand, and one Fannie Mae HomeReady loan totaling \$206.6 thousand.

Similarly, to help meet the credit needs of small businesses, C&N participates in SBA loan programs. While the bank makes such loans in other assessment areas, the bank made no such loans in the Lancaster, PA assessment area.

INVESTMENT TEST

The bank's investment performance in this assessment area was consistent with the bank's investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments and donations in the Lancaster, PA assessment area totaled just under \$2.1 million. Of the bank's total investments and donations, 7% were within the Lancaster, PA assessment area.

C&N made three qualified investments totaling just under \$2.1 million in the Lancaster, PA assessment area. Each investment supported affordable housing efforts in the assessment area. In addition to the qualified investments, C&N made three donations totaling \$15 thousand, each of which focused on community services in the assessment area.

The following table presents investment and donation activity for the Lancaster, PA assessment area.

Citizens & Northern Bank Lancaster, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	3	2,076	0	0	0	0	0	0	3	2,076
Donations	0	0	3	15	0	0	0	0	3	15
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	3	2,076	0	15	0	0	0	0	6	2,091

SERVICE TEST

The bank's service performance in the Lancaster, PA assessment area was below the bank's service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

The bank operated one branch in the assessment area (4% of the bank's total branches), which was opened in January 2022. The bank's single branch in the assessment area was located in an upper-income census tract using 2020 Census data¹⁷. The bank's one branch in the assessment area is open Monday through Friday, and has no Saturday hours, nor an on-site ATM.

In addition to retail services, bank staff provided a handful of financial literacy presentations to a school where over half of students qualify for free and reduced lunch in the assessment area. Finally, consistent with other assessment areas, the bank participates as an intermediary for the FHLB of Pittsburgh's "Home4Good Initiative." In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to FHLB of Pittsburgh, on their behalf. During the review period, the bank brought in \$119.0 thousand in support from this program.

¹⁷ The bank's branch was not geocoded using 2015 ACS data, as it was not opened until January 3, 2022.

**STATE OF NEW YORK /
NY NON-MSA ASSESSMENT AREA
FULL-SCOPE REVIEW**

STATE RATING

Performance Test	Performance Level
Lending	Low Satisfactory
Investment	Low Satisfactory
Service	Low Satisfactory
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects adequate penetration among retail customers;
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The bank made limited use of innovative and/or flexible lending practices;
- The bank made few, if any community development loans in the assessment area;
- The bank makes an adequate level of qualified community development investments and grants in the state.
- The bank exhibits adequate responsiveness to credit and community development needs; and
- The bank provides an adequate level of community development services.

SCOPE OF EXAMINATION

For the purposes of this CRA evaluation, the state rating is based solely on the bank's performance in the NY Non-MSA assessment area, which was evaluated using full-scope review procedures. C&N operates just one branch in the NY Non-MSA assessment area.

The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development.

For purposes of assessing C&N's overall CRA performance, very little weight was given to the bank's performance in the state of New York, as the overwhelming majority of the bank's operations are located in the Pennsylvania assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of the Assessment Area

C&N's NY Non-MSA assessment area consists of the entirety of Steuben County in New York. The assessment area is situated in the non-MSA portion of the state of New York, and is located directly north of Tioga County, in the bank's PA Non-MSA assessment area. Steuben County had a population of 98,665 according to the 2015 ACS, and 93,584 as of the 2020 Census.

As indicated above, for the purposes of assessing C&N's overall CRA performance, the least amount of weight was given to the performance in the NY Non-MSA assessment area. Of the bank's total loans, 4% by number, and 3% by dollar volume were originated in the NY Non-MSA assessment area. C&N operates one branch in this assessment area (4% of total branches), which holds \$80.1 million in deposits, or 4% of the bank's total deposits as of June 30, 2024.

C&N's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 American Community Survey (ACS) data, the NY Non-MSA assessment area contained 30 census tracts. No tracts were designated as low-income, while three tracts (10%) were moderate-income, 24 (80%) were middle-income, and three (10%) were upper-income. According to the 2020 Census data, the NY Non-MSA assessment area contained 31 census tracts. Once again, no tracts were designated as low-income, and three (10%) were designated as moderate-income, while 23 (74%) were middle-income, and five (16%) were upper-income.

Map of the assessment area at the time of the 2015 ACS, and at the time of the 2020 Census are available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2024, there were six depository institutions operating in the bank's NY Non-MSA assessment area. These institutions maintained a total of 19 branches, holding \$1.5 billion in deposits. C&N, with one branch in the assessment area, ranked fifth, with \$80.1 million, or 5% of the deposit market. Community Bank, N.A. ranked first, with seven branches holding \$539.7 million (36%) of the deposit market, followed by Five Star Bank with five branches holding \$522.6 million (35%) of the deposit market, and Chemung Canal Trust Company with two branches holding \$181.5 million (12%) of the deposit market.

C&N reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2021, a total of 113 institutions reported 2,684 HMDA loan originations and purchases within the assessment area. C&N tied for nineteenth in the HMDA market with just under 1% of total originations and purchases. Corning Credit Union ranked first in the HMDA market with 20% of the market share, followed by Community Bank, N.A. with 9% of the HMDA market and ServU Federal Credit Union with 7% of the HMDA market.

Aggregate 2022 HMDA data showed 129 lenders originating and purchasing 2,191 home-mortgage loans in the assessment area. C&N ranked thirteenth in the HMDA market with under 2% total originations and purchases. Corning Credit Union ranked first in the HMDA market with 21% of the market, followed by ServU Federal Credit Union with just over 10% of the market, and Community Bank, N.A. with 10% of the HMDA market.

Finally, 2023 aggregate HMDA data showed a 31% decrease in overall HMDA lending from the previous year, with 101 lenders originating 1,667 home-mortgage loans in the assessment area. C&N ranked eleventh in the HMDA market with under 2% total originations and purchases. Corning Credit Union ranked first in the HMDA market with 21% of the market, followed by ServU Federal Credit Union with 15% of the market, and Community Bank, N.A. with 10% of the HMDA market.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2021 small business and small farm data, there were 64 CRA reporters in the assessment area, originating or purchasing a total of 1,370 small business and small farm loans. C&N ranked eighth, with almost 4% of the market. American Express, N.B. ranked first with 21 % of all small business and small farm originations and purchases, followed by Community Bank, N.A. with 11% of the market's total small business and small farm loan originations and purchases, and Five Star Bank with just under 11%.

According to 2022 small business and small farm data, there were 55 CRA reporters in the assessment area, originating or purchasing a total of 1,264 small business and small farm loans. C&N ranked ninth with 2% of the market. American Express, N.B. ranked first with 25% of the market, followed by JP Morgan Chase Bank, N.A. with just over 8% of the market's total small business and small farm loan originations and purchases, and US Bank, N.A. with 8% of the CRA market.

Finally, according to 2023 small business and small farm data, there were 61 CRA reporters in the assessment area, originating or purchasing a total of 1,160 small business and small farm loans. C&N tied for nineteenth place with less than 1% of the market. American Express, N.B. ranked first with 26% of the market, followed by JP Morgan Chase Bank, N.A. with 12% of the market's total small business and small farm loan originations and purchases, and Citi Bank, N.A. with 9% of the CRA market.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on credit and community development needs of the NY Non-MSA assessment area. Both interviews were held with organizations that provide affordable housing.

Contacts indicated a need for funding and technical support for home purchases and new businesses. It was noted that rural housing is overlooked in favor of building in more urban areas where it is more economical to do so. Additionally, one of the community contacts noted a need for home repairs in the assessment area, as the average age of housing stock is quite high, and many homes

are in need of critical repairs in order for families to continue living in them. Finally, contacts indicated a need for community services, including support for food pantries, due to budget cuts for such services.

Economic Characteristics

As indicated above, C&N's NY Non-MSA assessment area consists of the entirety of Steuben County in the State of New York.

As noted previously, population in the assessment area declined during the review period, from 98,665 according to the 2015 ACS data, to 93,584 according to the 2020 Census. Despite a falling population, according to an economic overview published by the Steuben County Industrial Development Authority, Steuben County benefits from a cost of living that is 7% lower than the U.S. average. According to the economic overview, health care and social assistance represents the largest employment segment in the county (17%), followed by manufacturing (12%), and retail trade (11%). Major employers in the county include Corning, Inc., Alstom, Siemens Energy, Instant Brands, and Gunlocke.

Steuben County's unemployment rates are contained in the table below, along with the rates for the State of New York, and the United States, for years 2021 through 2023. During the evaluation period, seasonally unadjusted unemployment rates in the NY Non-MSA assessment area were lower than those in the State of New York, but just over nationwide measures in two of the three years of the evaluation.

Citizens & Northern Bank NY Non-MSA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
County	% 2021	% 2022	% 2023
Steuben County	5.0	3.7	4.0
State of New York	7.1	4.3	4.2
United States	5.3	3.6	3.6

Unemployment data is from the Bureau of Labor Statistics.

Housing

2015 ACS Data

According to the 2015 ACS data, the NY Non-MSA assessment area contained approximately 48,849 housing units, of which 59% were owner-occupied, 25% were rental units, and 16% were vacant units. The overall occupancy rate in the assessment area (59%) was above the occupancy rate of the state of New York, (48%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to 2015 ACS data, there were no low-income census tracts in the assessment area. Of total owner-occupied units, 8% were located in moderate-income tracts, while the majority of owner-occupied housing units (80%) were located in middle-income census tracts, and 13% were located in upper-income tracts.

Of the total existing housing units, 68% were single-family units, just under 11% were two-to-four family units, nearly 7% were multifamily units (five families or more), and 15% were mobile homes.

The median age of the housing stock was 61 years, making it older than that in the state of New York, where the median age of housing was 59 years, indicating a potential need for home improvement loans for rehabilitation of the assessment area's housing stock. This was anecdotally confirmed by community contacts.

Data show that the price of housing in the assessment area is much less expensive than in the state overall. According to 2015 ACS data, the median housing value in the NY Non-MSA assessment area was \$90,985, which is much lower than the median housing value in the state of New York (\$283,400). Data show a disparity between housing values in moderate-income tracts compared to those in middle-and upper-income tracts. The median housing value in moderate-income tracts was \$68,826, while the median housing value in middle-income tracts was \$88,759. The median housing value in upper-income tracts was highest at \$124,999. In the assessment area, almost 57% of the total owner-occupied housing units were valued at less than \$100 thousand, compared to the state, where only 17% of owner-occupied housing units were valued at less than \$100 thousand.

Finally, median gross rent (rent plus utilities) was less expensive in the assessment area than in the state of New York. Median gross rent in the NY Non-MSA assessment area was \$658, which was well below the median gross rent in New York of \$1,132. Within the NY Non-MSA assessment area, 37% of renters spent more than 30% of their income on rent, which is a much lower figure than in New York as a whole (51%).

2020 Census Data

According to the 2020 Census data, the NY Non-MSA assessment area contained approximately 49,688 housing units, of which 59% were owner-occupied, 22% were rental units, and 19% were vacant units. The overall occupancy rate in the assessment area (59%) was above the occupancy rate of the state of New York, (48%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home mortgage credit within such tracts. According to 2020 Census data, as there were no low-income tracts in the assessment area. Of owner-occupied housing units, 7% were located in moderate-income tracts. Once again, the majority of owner-occupied housing units (73%) were located in middle-income census tracts, and 20% were located in upper-income tracts.

Of the total existing housing units, 69% were single-family units, 10% were two-to-four family units, 7% were multifamily units (five families or more), and 14% were mobile homes. The median age of the housing stock was 61 years, which was in-line with the statewide average (63 years).

Though home prices increased across the board, data show that the price of housing in the assessment area was once again less expensive than in New York overall. According to 2020 Census data, the median housing value in the NY Non-MSA assessment area was \$104,186, which is much lower than the median housing value in the state of New York (\$325,000). Though there were no low-income tracts in the assessment area according to the 2020 Census, data show a disparity between

housing values in moderate- and middle-income tracts compared to those in upper-income tracts. The median housing value in moderate-income tracts was \$96,034, and the median housing value in middle-income tracts was \$95,573.

The median housing value in upper-income tracts was much higher, at \$155,349. Finally, in the assessment area, 48% of the total owner-occupied housing units were valued at less than \$100 thousand, compared to the state, where just 14% of owner-occupied housing units were valued at less than \$100 thousand.

Finally, median gross rent (rent plus utilities) rose, but was once again less expensive in the assessment area than in New York. Median gross rent in the NY Non-MSA assessment area was \$714, which was below the median gross rent in New York of \$1,315. Within the NY Non-MSA assessment area, 37% of renters spent more than 30% of their income on rent, which is a much lower figure than in New York as a whole (49%).

Borrower Income

2015 ACS Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 26,139 families in the assessment area. Of these families, 21% were designated as low-income, 19% were designated as moderate-income, 21% as middle-income, and 39% were upper-income. Families living below the poverty level represented just under 12% of families in the assessment area, which was consistent with the rate of 12% for the state of New York.

2020 Census Data

There was little change in the percentage of families of different income levels from the 2015 ACS to the 2020 Census. According to the 2020 Census data, of the 25,921 families in the assessment area, 20% were designated as low-income, 18% were designated as moderate-income, 21% as middle-income, and 41% were upper-income. Families living below the poverty level represented 8% of families in the assessment area, which is slightly lower than the rate of 10% for the state of New York.

For the purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified utilizing the HUD annually-adjusted median family income data made available by the FFIEC. Median family incomes for the assessment area are listed in the table below for each of the years covered by the evaluation and are categorized by the dollar amounts recognized as low-, moderate-, middle-, and upper-income respectively.

Year	FFIEC-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2021	\$69,400	Less than \$34,700	\$34,700 - \$55,519	\$55,520 - \$83,279	\$83,280 or more
2022	\$76,700	Less than \$38,350	\$38,350 - \$61,359	\$61,360 - \$92,039	\$92,040 or more
2023	\$83,700	Less than \$41,850	\$41,850 - \$66,959	\$66,960 - \$100,439	\$100,440 or more

Geographic Business Data

2015 ACS Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet business demographics, in 2021 there were 2,871 businesses in the assessment area. There were no low-income census tracts in the assessment area, according to 2015 ACS data. Of the businesses located in the assessment area, 7% were located in moderate-income tracts. The majority of businesses were located in middle-income tracts (75%), while 18% of businesses were located in upper-income tracts. Business demographic data also revealed that of the 2,871 businesses in the assessment area, 89% were small businesses with gross annual revenue of \$1 million or less.

2020 Census Data

According to Dun & Bradstreet business demographics, in 2022 there were 2,817 businesses in the assessment area. There were no low-income tracts in the assessment area, according to the 2020 Census data. Of the businesses in the assessment area, 9% were located in moderate-income tracts, 69% of businesses were located in middle-income tracts, and 22% were located in upper-income tracts. Business demographic data also revealed that of the 2,817 businesses in the assessment area, 89% were small businesses with gross annual revenue of \$1 million or less.

Finally, according to Dun & Bradstreet business demographics, in 2023 there were 2,817 businesses in the assessment area. There were no low-income tracts in the assessment area, according to the 2020 Census data. Of the businesses in the assessment area, 9% were located in moderate-income tracts, 69% of businesses were located in middle-income tracts, and 22% were located in upper-income tracts. Business demographic data also revealed that of the 2,817 businesses in the assessment area, 89% were small businesses with gross annual revenue of \$1 million or less.

Assessment area demographics used to evaluate C&N's performance in the NY Non-MSA assessment area in 2021, 2022, and 2023 are detailed in the tables on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank NY Non-MSA Assessment Area Assessment Area Demographics 2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,504	21.1
Moderate-income	3	10.0	2,169	8.3	469	21.6	4,975	19.0
Middle-income	24	80.0	20,340	77.8	2,286	11.2	5,547	21.2
Upper-income	3	10.0	3,630	13.9	252	6.9	10,113	38.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	26,139	100.0	3,007	11.5	26,139	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	4,032	2,225	7.7	55.2	1,202	29.8	605	15.0
Middle-income	38,198	22,871	79.5	59.9	8,629	22.6	6,698	17.5
Upper-income	6,619	3,660	12.8	55.3	2,471	37.3	488	7.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	48,849	28,756	100.0	58.9	12,302	25.2	7,791	15.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	211	7.3	196	7.7	10	4.7	5	4.8
Middle-income	2,144	74.7	1,894	74.2	159	74.0	91	86.7
Upper-income	516	18.0	461	18.1	46	21.3	9	8.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,871	100.0	2,551	100.0	215	100.0	105	100.0
	Percentage of Total Businesses:			88.9		7.5		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	17	6.7	15	6.2	1	12.5	1	100.0
Middle-income	225	89.3	219	90.1	6	75.0	0	0.0
Upper-income	10	4.0	9	3.7	1	12.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	252	100.0	243	100.0	8	100.0	1	100.0
	Percentage of Total Farms:			96.4		3.2		0.4

2015 ACS Data and 2021 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank NY Non-MSA Assessment Area Assessment Area Demographics 2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,267	20.3
Moderate-income	3	9.7	1,971	7.6	255	12.9	4,704	18.1
Middle-income	23	74.2	18,601	71.8	1,585	8.5	5,400	20.8
Upper-income	5	16.1	5,349	20.6	281	5.3	10,550	40.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	31	100.0	25,921	100.0	2,121	8.2	25,921	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	4,468	2,110	7.2	47.2	1,187	26.6	1,171	26.2
Middle-income	36,809	21,243	72.6	57.7	7,747	21.0	7,819	21.2
Upper-income	8,411	5,905	20.2	70.2	1,907	22.7	599	7.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,688	29,258	100.0	58.9	10,841	21.8	9,589	19.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	261	9.3	236	9.4	23	11.0	2	1.9
Middle-income	1,940	68.9	1,712	68.4	143	68.0	85	81.7
Upper-income	616	21.8	555	22.2	44	21.0	17	16.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,817	100.0	2,503	100.0	210	100.0	104	100.0
	Percentage of Total Businesses:			88.9		7.5		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	11	4.6	11	4.7	0	0.0	0	0.0
Middle-income	214	88.8	205	88.4	8	100.0	1	100.0
Upper-income	16	6.6	16	6.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	241	100.0	232	100.0	8	100.0	1	100.0
	Percentage of Total Farms:			96.3		3.3		0.4

2020 Census Data and 2022 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank NY Non-MSA Assessment Area Assessment Area Demographics 2023								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,267	20.3
Moderate-income	3	9.7	1,971	7.6	255	12.9	4,704	18.1
Middle-income	23	74.2	18,601	71.8	1,585	8.5	5,400	20.8
Upper-income	5	16.1	5,349	20.6	281	5.3	10,550	40.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	31	100.0	25,921	100.0	2,121	8.2	25,921	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	4,468	2,110	7.2	47.2	1,187	26.6	1,171	26.2
Middle-income	36,809	21,243	72.6	57.7	7,747	21.0	7,819	21.2
Upper-income	8,411	5,905	20.2	70.2	1,907	22.7	599	7.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,688	29,258	100.0	58.9	10,841	21.8	9,589	19.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	260	9.2	233	9.3	25	11.8	2	2.0
Middle-income	1,939	68.9	1,715	68.5	140	66.0	84	83.1
Upper-income	618	21.9	556	22.2	47	22.2	15	14.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,817	100.0	2,504	100.0	212	100.0	101	100.0
	Percentage of Total Businesses:			88.9		7.5		3.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	11	4.6	11	4.8	0	0.0	0	0.0
Middle-income	213	88.8	204	88.3	8	100.0	1	100.0
Upper-income	16	6.6	16	6.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	240	100.0	231	100.0	8	100.0	1	100.0
	Percentage of Total Farms:			96.3		3.3		0.4

2020 Census Data and 2023 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers and businesses of different sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

C&N's lending levels in the NY Non-MSA assessment area reflect adequate responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the NY Non-MSA assessment area represented 4% of the bank's overall lending by number of loans, and 3% by dollar volume. During the evaluation period, C&N made 89 HMDA loans totaling nearly \$12 million, 68 small business loans totaling \$7.6 million, and 17 small farm loans totaling \$422 thousand in the NY Non-MSA assessment area.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, adequate penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending performance, given the demographics of the assessment area, including the fact that there were no low-income census tracts using 2015 ACS data or 2020 Census data. Further, due to loan volumes, HMDA loans were given the most weight in determining the bank's overall borrower distribution of loans, followed by CRA small business loans.

Home-Mortgage Lending

C&N's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is adequate.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 21% of assessment area families were designated as low-income, 19% were moderate-income, 21% were middle-income, and 39% were upper-income. According to 2015 ACS data, 40% of families were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

Similarly, according to the 2020 Census data, 20% of assessment area families were designated as low-income, 18% were moderate-income, 21% were middle-income, and 41% were upper-income. Using 2020 Census data, 38% of families were low- or moderate-income families.

The following tables compare C&N's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate lending in 2021, relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data. The remaining tables, used to evaluate 2022 and 2023 lending, rely on 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data.

Citizens & Northern Bank NY Non-MSA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	21.1	3.8	7.2
Moderate	19.0	15.4	18.9
Middle	21.2	15.4	22.8
Upper	38.7	65.4	36.7
Unknown	0.0	0.0	14.4
Total	100.0	100.0	100.0

Citizens & Northern Bank NY Non-MSA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	20.3	8.6	8.2
Moderate	18.1	20.0	22.2
Middle	20.9	25.7	23.0
Upper	40.7	40.0	33.5
Unknown	0.0	5.7	13.1
Total	100.0	100.0	100.0

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank NY Non-MSA Assessment Area Distribution of HMDA Loans by Borrower Income Level				
Income Level	% Families by Family Income (2020 Census Data)	Aggregate Comparison		
		2023		
		% C&N Lending	% Aggregate Lending	
Low	20.3	10.7	9.3	
Moderate	18.1	14.3	21.4	
Middle	20.9	21.4	25.0	
Upper	40.7	35.7	30.4	
Unknown	0.0	17.9	14.0	
Total	100.0	100.0	100.0	

Lending to Low-Income Borrowers

Overall, C&N's lending to low-income borrowers was adequate.

2015 ACS Data

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a downpayment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

C&N's lending in 2021 to low-income borrowers was poor. In 2021, 4% of the bank's HMDA loans (one loan) were to low-income borrowers in the assessment area, which was below the aggregate lending level of 7% and the proxy of low-income families in the assessment area, which was 21%. By product type, C&N's single loan to a low-income borrower was a refinance loan. In comparison, 2021 aggregate lending data shows that 7% of home purchase loans, 7% of refinance loans, 11% of home improvement loans, 10% of other purpose lines of credit loans, 8% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" were made to low-income borrowers.

2020 Census Data

C&N's lending in 2022 to low-income borrowers was adequate. In 2022, 9% of the bank's HMDA loans (three loans) were to low-income borrowers in the assessment area, which was just above the aggregate lending level of 8%, but below the proxy of 20%. By product type, C&N originated 6% of its home purchase loans, 33% of its home improvement loans, 100% of other purpose closed/exempt loans, and no refinance loans, multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to low-income borrowers.

In comparison, 2022 aggregate lending data shows that 7% of home purchase loans, 10% of refinance loans, 8% of home improvement loans, 9% of other purpose lines of credit, 15% of other purpose closed/exempt loans, 4% of loans with purpose "not applicable," and no multifamily loans were made to low-income borrowers.

C&N's lending in 2023 to low-income borrowers was good. In 2023, 11% of the bank's HMDA loans (three loans) were to low-income borrowers in the assessment area, which was above the aggregate lending level of 9%, but below the proxy of 20%. By product type, C&N originated 5% of its home purchase loans, 50% of its home improvement loans, 25% of its other purpose lines of credit, and no refinance loans, multifamily loans, other purpose closed/exempt loans, or loans with purpose "not applicable" to low-income borrowers. In comparison, 2023 aggregate lending data shows that 7% of home purchase loans, 10% of refinance loans, 13% of home improvement loans, 13% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" were made to low-income borrowers.

Lending to Moderate-Income Borrowers

For the period under review, the bank's lending to moderate-income borrowers was adequate.

2015 ACS Data

C&N's lending in 2021 to moderate-income borrowers was adequate. In 2021, 15% of the bank's HMDA loans (four loans) were to moderate-income borrowers in the assessment area, which was just under both the aggregate lending level and the proxy of moderate-income families, both of which were 19%. By product type, C&N originated 13% of its home purchase loans, 13% of its refinance loans, 50% of other purpose closed/exempt loans, and no home improvement loans, multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, 2021 aggregate lending data shows that 21% of home purchase loans, 17% of refinance loans, 20% of home improvement loans, 16% of other purpose lines of credit, 26% other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" were made to moderate-income borrowers.

2020 Census Data

C&N's lending in 2022 to moderate-income borrowers was good. In 2022, 20% of the bank's HMDA loans (seven loans) were to moderate-income borrowers in the assessment area, which was just below the aggregate lending level of 22%, but above and the proxy of 18%. By product type, C&N originated 19% of its home purchase loans, 25% of its refinance loans, 33% of other purpose lines of credit, and no home improvement loans, multifamily loans, other purpose closed/exempt loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, 2022 aggregate lending data shows that 25% of home purchase loans, 23% of refinance loans, 14% of home improvement loans, 18% of other purpose lines of credit, 21% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" were made to moderate-income borrowers.

C&N's lending in 2023 to moderate-income borrowers was adequate. In 2023, 14% of the bank's HMDA loans (four loans) were to moderate-income borrowers in the assessment area, which was below both the aggregate lending level of 21% and the proxy of 18. By product type, C&N originated 21% of its home purchase loans, and no refinance loans, home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, 2023 aggregate lending data shows that

23% of home purchase loans, 22% of refinance loans, 16% of home improvement loans, 15% of other purpose lines of credit, 27% other purpose closed/exempt loans, and no multifamily loans, or loans with purpose “not applicable” were made to moderate-income borrowers.

Small Business Lending

An analysis of C&N’s borrower distribution of small business loans reflects adequate penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

The number of businesses operating in the bank’s assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to available Dun & Bradstreet business demographic data, in 2021 there were 2,871 businesses in the assessment area, with 2,551 (89%) designated as small businesses. In 2022, there were 2,817 businesses in the assessment area, 2,503 (89%) of which were small businesses. Finally, in 2023, there were 2,817 businesses in the assessment area, 2,504 (89%) of which were small businesses.

2015 ACS Data

In 2021, the bank’s borrower distribution of small business loans was good. In 2021, C&N originated 37 small business loans within the assessment area, aggregating \$2.1 million. Of these loans, 65% (24 loans) were originated to small businesses. This performance was above the aggregate lending level of 40% to small businesses, but below the proxy of 89%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2021, 81% of C&N’s small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 92% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

2020 Census Data

The bank’s borrower distribution of small business loans in 2022 was poor. In 2022, C&N originated 27 small business loans within the assessment area, aggregating \$3.9 million, of which 37% (10 loans) were originated to small businesses. This performance was well below both the aggregate lending level of 52% to small businesses, and the proxy of 89%. In 2022, 74% of C&N’s small business loans were extended in amounts of \$100 thousand or less.

Aggregate data indicates that 94% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

The bank’s borrower distribution of small business loans in 2023 was adequate. In 2023, C&N originated four small business loans within the assessment area, aggregating \$1.6 million, of which

50% (two loans) were originated to small businesses. This performance was in-line with the aggregate lending level of 53% to small businesses, but well below the proxy of 89%. In 2023, 50% of C&N's small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 95% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects adequate penetration throughout the NY Non-MSA assessment area, in moderate-income tracts. As mentioned previously, there were no low-income census tracts in the NY Non-MSA assessment area during the review period, and as a result, the geographic distribution analysis is based solely on the bank's performance in moderate-income census tracts. Once again, it is noted that HMDA loans were given greater weight in determining this conclusion, given their higher volume by number and dollar amount, followed by small business loans.

Home-Mortgage Lending

C&N's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts, is adequate. The percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, 8% of owner-occupied housing was located in moderate-income tracts. The majority of owner-occupied housing (almost 80%) was located in middle-income census tracts, and nearly 13% of owner-occupied housing was located in upper-income tracts.

According to 2020 Census data, 7% of owner-occupied housing was located in moderate-income tracts. Once again, the majority of owner-occupied housing (73%) was located in middle-income census tracts, and 20% of owner-occupied housing was located in upper-income tracts.

The following tables present C&N's geographic distribution of HMDA loans from 2021 through 2023, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The first table, used for lending in 2021, relies on 2015 ACS data, along with updated HMDA data. Both the second table and the third table use 2020 Census data, and updated HMDA data.

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

Citizens & Northern Bank NY Non-MSA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	7.7	3.8	6.2
Middle	79.5	92.4	74.9
Upper	12.7	3.8	18.9
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Citizens & Northern Bank NY Non-MSA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	7.2	0.0	8.6
Middle	72.6	88.6	67.2
Upper	20.2	11.4	24.2
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Citizens & Northern Bank NY Non-MSA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison	
		2023	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	7.2	10.7	9.0
Middle	72.6	71.4	66.8
Upper	20.2	17.9	24.2
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Lending in Moderate-Income Census Tracts

C&N's overall HMDA lending in moderate-income tracts was adequate.

2015 ACS Data

C&N's lending in moderate-income tracts in 2021 was adequate. In 2022, C&N's HMDA lending in moderate-income tracts was 4% (one loan), which measured below both the proxy of 8% of owner-occupied housing in moderate-income tracts, as well as the aggregate performance of 6%.

Categorized by loan product type, C&N's single loan in a moderate-income tract was a home purchase loan.

Aggregate lending data shows that 6% of home purchase loans, 5% of refinance loans, 9% of home improvement loans, 13% of multifamily loans, 9% of other purpose line of credit, 10% of other purpose closed/exempt loans, and 8% of loans with purpose "not applicable" were made in moderate-income census tracts in the assessment area in 2021.

2020 Census Data

The bank's lending in moderate-income census tracts in 2022 was poor. In 2022, C&N originated no HMDA loans in moderate-income tracts. This performance was below both the proxy of 7% of owner-occupied housing in moderate-income tracts, as well as the aggregate performance of 9%. By loan type, aggregate lenders made 10% of home purchase loans, 8% of refinance loans, 4% of home improvement loans, 11% of multifamily loans, 5% of other purpose lines of credit, 7% of other purpose closed/exempt loans, and 4% of loans with purpose "not applicable" in moderate-income census tracts.

Finally, the bank's lending in moderate-income census tracts in 2023 was good. In 2023, C&N's HMDA lending in moderate-income tracts was 11% (three loans), which measured above both the proxy of owner-occupied housing in moderate-income tracts, which was 7%, as well as the aggregate performance of 9%. Categorized by loan product type, C&N made 5% of its home purchase loans, 100% of its multifamily loans, 25% of its other purpose line of credit, no refinance loans, home improvement loans, other purpose closed/exempt loans, or loans with purpose "not applicable" in moderate-income tracts in 2023. Aggregate lending data shows that 10% of home purchase loans, 8% of refinance loans, 10% of home improvement loans, 20% of multifamily loans, 7% of other purpose line of credit, 8% of other purpose closed/exempt loans, and 11% of loans with purpose "not applicable" were made in moderate-income census tracts in the assessment area in 2023.

Small Business Lending

The geographic distribution of C&N's small business lending reflects adequate penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. As noted previously, no low-income census tracts were present in the NY Non-MSA assessment area at the time of the 2015 ACS or the 2020 Census. Based on available business data in 2021, 7% of the assessment area's businesses were located in moderate-income tracts. The majority of businesses were located in middle-income tracts (75%), while 18% of businesses were located in upper-income tracts.

In 2022, 9% of businesses were located in moderate-income tracts, 69% were located in middle-income tracts, and 22% were located in upper-income tracts. Similarly, in 2023, 9% of businesses

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

were located in moderate-income tracts, 69% were located in middle-income tracts, and 22% were located in upper-income tracts.

The tables below present C&N's small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

Citizens & Northern Bank NY Non-MSA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2021	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	7.3	10.8	7.1
Middle	74.7	81.1	77.7
Upper	18.0	8.1	14.5
Tract Unknown	0.0	0.0	0.7
Total	100.0	100.0	100.0

Citizens & Northern Bank NY Non-MSA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2020 Census Data)	Aggregate Comparison	
		2022	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	9.3	51.9	9.3
Middle	68.9	48.1	71.5
Upper	21.9	0.0	18.5
Tract Unknown	0.0	0.0	0.7
Total	100.0	100.0	100.0

Citizens & Northern Bank NY Non-MSA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2020 Census Data)	Aggregate Comparison	
		2023	
		% C&N Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	9.2	25.0	10.2
Middle	68.8	75.0	68.6
Upper	21.9	0.0	20.3
Tract Unknown	0.0	0.0	0.8
Total	100.0	100.0	100.0

Lending in Moderate-Income Census Tracts

C&N's small business lending in moderate-income tracts was good.

2015 ACS Data

In 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was good. C&N originated 11% of its small business loans (four loans) in the assessment area's moderate-income census tracts. The bank's lending level was above both the applicable loan demand proxy of 7% of businesses located in moderate-income census tracts, and the 2021 aggregate small business lending level of 7%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in moderate-income census tracts was excellent. C&N originated 52% of its small business loans (14 loans) in the assessment area's moderate-income census tracts. The bank's lending level was well above both the applicable loan demand proxy, and the 2022 aggregate small business lending level, both of which were 9%.

In 2023, the geographic distribution of the bank's small business lending in moderate-income census tracts was good. C&N originated 25% of its small business loans (one loan) in the assessment area's moderate-income census tracts. The bank's lending level was above both the applicable loan demand proxy of 9%, and the 2023 aggregate small business lending level of 10%.

Responsiveness to Credit Needs

C&N exhibits an adequate record of servicing the credit needs of low- and moderate-income individuals and areas and very small businesses, consistent with safe and sound banking practices. Responsiveness was primarily demonstrated through the bank's retail HMDA and small business lending, given that no community development loans were made, and few innovative/flexible lending products were used in this assessment area.

Innovative and/or Flexible Lending Practices

C&N makes limited use of innovative and/or flexible lending practices in serving the credit needs of the NY Non-MSA assessment area.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the NY Non-MSA assessment area, C&N offers two flexible mortgage programs developed in-house. More specifically, the bank offers a proprietary First-Time Homebuyer Program, with mortgage features including as little as 3% down, seller's assistance up to 3%, a free homeowner education program, free consultations with bank staff, and no monthly PMI payments.

The bank also offers an Emergency Loan Relief Program for borrowers affected by unexpected natural disasters. During the evaluation period, the bank made two First-Time Homebuyer loans totaling \$200 thousand, and two Emergency Relief loans totaling \$20 thousand in response to Tropical Storm Debby.

Additionally, C&N offers a variety of first-time homebuyer products through government agencies, including the FHA, USDA, VA, Fannie Mae, and others. During the evaluation timeframe, the bank made one FHA loan totaling \$230 thousand, and two Fannie Mae HomeReady loans totaling over \$243 thousand.

Similarly, the credit needs of small businesses can often be addressed more effectively through alternative products. In an effort to address the credit needs of small businesses in its assessment areas, C&N participates in SBA loan programs, though the bank made no such loans in the NY Non-MSA assessment area.

Community Development Lending

C&N makes few, if any, community development loans in the assessment area.

During the period evaluated, which includes the timeframe between February 1, 2022 through November 4, 2024, the bank made no qualified community development loans in the NY Non-MSA assessment area. No community development lending took place in the assessment area at the previous CRA evaluation.

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Volume of Investment and Grant Activity

C&N made an adequate level of qualified community development investments and grants, rarely in a leadership position. The bank made 11 qualified investments, grants, and donations for the NY Non-MSA assessment area totaling over \$2.7 million, which represents an increase from the previous CRA examination when the bank made seven investments totaling \$917 thousand in the assessment area. Of the bank's total investments and donations, 9% were made within the NY Non-MSA assessment area.

The bank made two qualified investments totaling \$2.7 million, and both supported affordable housing in the NY Non-MSA assessment area.

In addition to the two qualified investments, the bank also made nine donations totaling \$17.5 thousand to local. Of the total dollar amount, just under \$1 thousand (over 5%) supported community services for low- and moderate-income individuals, \$6.5 thousand (37%) supported economic

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

development to support small businesses and small farms in the area, and \$10 thousand (57%) supported revitalization and stabilization efforts in the assessment area.

The following table presents the investments and grant activity of the NY Non-MSA assessment area.

Citizens & Northern Bank NY Non-MSA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	2	2,662	0	0	0	0	0	0	2	2,662
Donations	0	0	7	<.1	1	7	1	10	9	17
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	2	2,662	7	<.1	1	7	1	10	11	2,679

Responsiveness to Credit and Community Development Needs

C&N exhibits adequate responsiveness to credit and community development needs of the assessment area. As mentioned previously, the level of qualified investments and grants increased significantly since the prior evaluation. Further, as noted in the table above, a significant portion of the bank's qualified investments by dollar amount supported affordable housing in the assessment area, a pronounced community need as indicated through community development interviews.

Community Development Initiatives

C&N makes occasional use of innovative and/or complex investments to support community development initiatives. In the NY Non-MSA assessment area, the bank invested in two mortgage-backed securities totaling \$2.7 million to support home ownership for low- and moderate-income borrowers or geographies in the assessment area. These investment types are more complex than simple donations.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting the assessment area needs; and
- The extent to which an institution provides community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. For a portion of the evaluation period, the bank operated two branches in the assessment area, until the closure in late 2022 reduced this number to one single branch (4% of all branches).

The following tables detail the locations of the bank's branches with comparison to 2015 ACS, and 2020 Census population demographics.

Citizens & Northern Bank NY Non-MSA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent Branches	Population	Percent of Population
Low	0	0.0	0	0.0
Moderate	0	0.0	8,684	8.8
Middle	2	100.0	75,807	76.8
Upper	0	0.0	14,174	14.4
Unknown Income	0	0.0	0	0.0
Totals	2	100.0	98,665	100.0

Citizens & Northern Bank NY Non-MSA Assessment Area Retail Branch Distribution 2020 Census Data				
Census Tract Type	Number of Branches	Percent Branches	Population	Percent of Population
Low	0	0.0	0	0.0
Moderate	0	0.0	7,933	8.5
Middle	1	100.0	67,343	72.0
Upper	0	0.0	18,308	19.5
Unknown Income	0	0.0	0	0.0
Totals	1	100.0	93,584	100.0

The bank's branch is open Monday through Friday, as well as Saturday mornings. An ATM is available at the bank's branch location, which provides electronic access to banking services.

To supplement traditional banking services, C&N provides alternative delivery systems through its full-service website. Customers are able to pay bills, view and print statements, collect recurring customer payments, transfer money between accounts, reorder checks, deposit payroll, and apply for loans using the bank's online website at cnbankpa.com.

Changes in Branch Locations

C&N's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals. As noted above, one branch, located in a middle-income census tract in Canisteo, NY, closed on November 4, 2022.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned previously, the bank's one branch in the NY Non-MSA assessment area has an ATM and is open Monday through Friday, as well as Saturday mornings in both the lobby and the drive-through portions of the branch.

Bank Products

C&N offers products that provide greater access to banking services for low- and moderate-income customers, including C&N Everyday Checking Account Basic Checking, a free checking account for consumers, which features no minimum monthly balance requirements, no monthly maintenance charges, and no per-check charges. Additionally, the bank offers a Simple Debit Account, which is a certified Bank-On account targeted to unbanked and underbanked individuals and serves as a second chance account for customers who may not qualify for a traditional account due to a past charge-off. The Simple Debit account has a \$5 service charge per month, offers free printed and electronic statements, free online bill payment, and contains no nonsufficient funds, uncollected funds, or overdraft fees.

The bank also offers products to serve the needs of businesses of different sizes. The bank's Super B Checking Account is a basic checking account that is ideal for small businesses with limited transaction activity. For businesses with a desire to earn interest, the bank offers a Business Interest Checking Account, though this requires the business to maintain a balance of \$1,000 or greater each month. Both business accounts offer 250 free transaction items processed through the account, with transactions above the monthly maximum incurring a \$.25 per item charge. This account allows very small businesses access to banking services that meet their needs.

Community Development Services

C&N provides an adequate level of community development services in the assessment area.

Over the evaluation period, bank officers and employees provided qualified community development services, serving in various capacities on boards and committees, and providing technical assistance to community and economic development organizations. Some notable examples included:

- An employee serves as a board member for REDEC/RCC Development, an economic development organization supporting small businesses in the assessment area.
- An employee serves as a board member and member of the asset management committee for Arbor Housing and Development, a housing organization that focuses on providing affordable housing.

Additionally, the bank provided two financial literacy presentations at a local school where over half of students qualified for free or reduced lunch in the assessment area.

CRA APPENDICES

CRA APPENDIX A: SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
Time Period Reviewed			
02/01/2022 – 11/04/2024			
Financial Institution		Products Reviewed	
Citizens & Northern Bank		HMDA	
		Small Business	
Affiliates	Affiliate Relationship	Products Reviewed	
N/A	N/A	N/A	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Examination	Branches Visited ¹⁸	Other Information
PA Non-MSA Assessment Area	Full-Scope	N/A	No low-income census tracts in the assessment area according to 2020 Census data.
Philadelphia, PA Assessment Area	Full-Scope	N/A	Small business loans weighted more than HMDA loans in borrower and geographic distribution analyses due to loan volumes.
NY Non-MSA Assessment Area	Full-Scope	N/A	No low-income census tracts in the assessment area according to both the 2015 ACS and 2020 Census data.
Williamsport, PA Assessment Area	Limited-Scope	N/A	N/A
York, PA Assessment Area	Limited-Scope	N/A	Small business loans weighted more than HMDA loans in borrower and geographic distribution analyses due to loan volumes.
Lancaster, PA Assessment Area	Limited-Scope	N/A	Small business loans weighted more than HMDA loans in borrower and geographic distribution analyses due to loan volumes.

¹⁸ No branch visits were performed in accordance with the scoping process for this evaluation. The institution's CRA Public File was reviewed electronically.

CRA APPENDIX B: SUMMARY OF STATE RATINGS

State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Commonwealth of Pennsylvania	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of New York	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

CRA APPENDIX C: GLOSSARY

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and its physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: Community development: All Agencies have adopted the following language.

- (1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
- (2) Community services targeted to low- or moderate-income individuals;
- (3) Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or
- (4) Activities that revitalize or stabilize—
 - (i) Low-or moderate-income geographies;
 - (ii) Designated disaster areas; or
 - (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on—
 - A. Rates of poverty, unemployment, and population loss; or
 - B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals; or
- (5) Loans, investments, and services that—
 - (i) Support, enable or facilitate projects or activities that meet the “eligible uses” criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
 - (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
 - (iii) Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

Family: 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 (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

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

Household: 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 (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

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

Small loan(s) to farm(s): A loan included in loans to small farms as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans

have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 HMDA LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	23	6.5%	1,882	3.4%
Moderate	0	0.0%	0	0.0%	55	15.6%	6,197	11.1%
Middle	339	96.3%	53,384	95.2%	92	26.1%	12,837	22.9%
Upper	13	3.7%	2,687	4.8%	164	46.6%	32,542	58.0%
Unknown	0	0.0%	0	0.0%	18	5.1%	2,614	4.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	352	100.0%	56,072	100.0%	352	100.0%	56,072	100.0%
Refinance								
Low	0	0.0%	0	0.0%	11	4.1%	651	1.6%
Moderate	0	0.0%	0	0.0%	44	16.2%	4,263	10.4%
Middle	244	90.0%	36,470	89.1%	67	24.7%	8,618	21.1%
Upper	27	10.0%	4,448	10.9%	139	51.3%	26,183	64.0%
Unknown	0	0.0%	0	0.0%	10	3.7%	1,204	2.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	271	100.0%	40,918	100.0%	271	100.0%	40,918	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	5.3%	37	2.6%
Moderate	0	0.0%	0	0.0%	7	18.4%	188	13.0%
Middle	36	94.7%	1,396	96.7%	9	23.7%	348	24.1%
Upper	2	5.3%	47	3.3%	18	47.4%	752	52.1%
Unknown	0	0.0%	0	0.0%	2	5.3%	118	8.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	1,443	100.0%	38	100.0%	1,443	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	625	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	625	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	625	100.0%	2	100.0%	625	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	4	7.7%	158	5.0%
Moderate	0	0.0%	0	0.0%	6	11.5%	224	7.1%
Middle	49	94.2%	3,012	96.0%	9	17.3%	552	17.6%
Upper	3	5.8%	125	4.0%	32	61.5%	2,096	66.8%
Unknown	0	0.0%	0	0.0%	1	1.9%	108	3.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	3,137	100.0%	52	100.0%	3,137	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	40	5.6%	2,728	2.7%
Moderate	0	0.0%	0	0.0%	112	15.7%	10,870	10.6%
Middle	670	93.7%	94,887	92.8%	177	24.8%	22,355	21.9%
Upper	45	6.3%	7,308	7.2%	353	49.4%	61,573	60.3%
Unknown	0	0.0%	0	0.0%	33	4.6%	4,669	4.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	715	100.0%	102,195	100.0%	715	100.0%	102,195	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 HMDA LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	13	4.8%	943	1.9%
Moderate	22	8.1%	3,607	7.4%	48	17.8%	5,956	12.3%
Middle	241	89.3%	43,436	89.7%	69	25.6%	9,818	20.3%
Upper	7	2.6%	1,396	2.9%	127	47.0%	29,866	61.7%
Unknown	0	0.0%	0	0.0%	13	4.8%	1,857	3.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	270	100.0%	48,439	100.0%	270	100.0%	48,439	100.0%
Refinance								
Low	0	0.0%	0	0.0%	18	11.3%	1,351	7.3%
Moderate	5	3.1%	601	3.3%	29	18.1%	2,476	13.4%
Middle	148	92.5%	17,091	92.7%	40	25.0%	4,672	25.3%
Upper	7	4.4%	748	4.1%	67	41.9%	8,813	47.8%
Unknown	0	0.0%	0	0.0%	6	3.8%	1,128	6.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	160	100.0%	18,440	100.0%	160	100.0%	18,440	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	6	9.1%	218	5.9%
Moderate	4	6.1%	252	6.8%	9	13.6%	392	10.7%
Middle	59	89.4%	3,274	88.9%	19	28.8%	1,132	30.7%
Upper	3	4.5%	157	4.3%	31	47.0%	1,900	51.6%
Unknown	0	0.0%	0	0.0%	1	1.5%	40	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	3,683	100.0%	66	100.0%	3,683	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	445	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	445	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	445	100.0%	2	100.0%	445	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	2	1.9%	65	0.9%
Moderate	10	9.4%	672	9.7%	22	20.8%	1,119	16.1%
Middle	96	90.6%	6,291	90.3%	22	20.8%	1,219	17.5%
Upper	0	0.0%	0	0.0%	53	50.0%	4,207	60.4%
Unknown	0	0.0%	0	0.0%	7	6.6%	353	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	106	100.0%	6,963	100.0%	106	100.0%	6,963	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	4	9.3%	97	3.2%
Moderate	5	11.6%	217	7.2%	9	20.9%	576	19.1%
Middle	38	88.4%	2,802	92.8%	9	20.9%	746	24.7%
Upper	0	0.0%	0	0.0%	21	48.8%	1,600	53.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	3,019	100.0%	43	100.0%	3,019	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	43	6.6%	2,674	3.3%
Moderate	46	7.1%	5,349	6.6%	117	18.1%	10,520	13.0%
Middle	584	90.3%	73,339	90.6%	159	24.6%	17,586	21.7%
Upper	17	2.6%	2,301	2.8%	299	46.2%	46,387	57.3%
Unknown	0	0.0%	0	0.0%	29	4.5%	3,822	4.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	647	100.0%	80,989	100.0%	647	100.0%	80,989	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 HMDA LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	16	5.9%	1,269	2.7%
Moderate	15	5.5%	1,977	4.2%	56	20.6%	6,148	13.0%
Middle	249	91.5%	43,890	92.5%	60	22.1%	8,310	17.5%
Upper	8	2.9%	1,562	3.3%	132	48.5%	30,493	64.3%
Unknown	0	0.0%	0	0.0%	8	2.9%	1,209	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	272	100.0%	47,428	100.0%	272	100.0%	47,428	100.0%
Refinance								
Low	0	0.0%	0	0.0%	11	15.7%	505	8.0%
Moderate	5	7.1%	393	6.2%	18	25.7%	1,263	20.1%
Middle	64	91.4%	5,868	93.2%	20	28.6%	2,026	32.2%
Upper	1	1.4%	34	0.5%	19	27.1%	2,078	33.0%
Unknown	0	0.0%	0	0.0%	2	2.9%	423	6.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	6,295	100.0%	70	100.0%	6,295	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	8	10.3%	165	4.0%
Moderate	5	6.4%	251	6.1%	20	25.6%	719	17.6%
Middle	72	92.3%	3,812	93.1%	10	12.8%	426	10.4%
Upper	1	1.3%	30	0.7%	39	50.0%	2,763	67.5%
Unknown	0	0.0%	0	0.0%	1	1.3%	20	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	4,093	100.0%	78	100.0%	4,093	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	16.7%	50	5.0%	1	16.7%	50	5.0%
Middle	5	83.3%	948	95.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	33.3%	418	41.9%
Unknown	0	0.0%	0	0.0%	3	50.0%	530	53.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	998	100.0%	6	100.0%	998	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	6	6.4%	170	2.8%
Moderate	3	3.2%	130	2.1%	17	18.1%	531	8.6%
Middle	89	94.7%	5,754	93.5%	20	21.3%	1,013	16.5%
Upper	2	2.1%	270	4.4%	44	46.8%	3,767	61.2%
Unknown	0	0.0%	0	0.0%	7	7.4%	674	10.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	94	100.0%	6,154	100.0%	94	100.0%	6,154	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2023 HMDA LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	4	9.3%	128	5.3%
Moderate	2	4.7%	346	14.4%	9	20.9%	273	11.3%
Middle	39	90.7%	1,908	79.2%	15	34.9%	724	30.0%
Upper	2	4.7%	156	6.5%	12	27.9%	1,152	47.8%
Unknown	0	0.0%	0	0.0%	3	7.0%	134	5.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	2,410	100.0%	43	100.0%	2,410	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	45	8.0%	2,237	3.3%
Moderate	31	5.5%	3,147	4.7%	121	21.5%	8,984	13.3%
Middle	518	92.0%	62,180	92.3%	125	22.2%	12,498	18.5%
Upper	14	2.5%	2,052	3.0%	248	44.0%	40,671	60.4%
Unknown	0	0.0%	0	0.0%	24	4.3%	2,989	4.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	563	100.0%	67,379	100.0%	563	100.0%	67,379	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	9	37.5%	2,360	23.1%	1	4.2%	250	2.4%
Middle	6	25.0%	1,943	19.0%	7	29.2%	2,122	20.8%
Upper	9	37.5%	5,917	57.9%	8	33.3%	3,931	38.5%
Unknown	0	0.0%	0	0.0%	8	33.3%	3,918	38.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	10,221	100.0%	24	100.0%	10,221	100.0%
Refinance								
Low	1	2.7%	400	3.7%	1	2.7%	208	1.9%
Moderate	2	5.4%	392	3.6%	8	21.6%	1,481	13.8%
Middle	19	51.4%	3,908	36.3%	8	21.6%	1,435	13.3%
Upper	15	40.5%	6,059	56.3%	14	37.8%	5,429	50.5%
Unknown	0	0.0%	0	0.0%	6	16.2%	2,206	20.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	37	100.0%	10,758	100.0%	37	100.0%	10,758	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	142	10.6%	0	0.0%	0	0.0%
Upper	1	50.0%	1,200	89.4%	1	50.0%	1,200	89.4%
Unknown	0	0.0%	0	0.0%	1	50.0%	142	10.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	1,342	100.0%	2	100.0%	1,342	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	9	50.0%	10,545	57.2%	0	0.0%	0	0.0%
Middle	3	16.7%	1,661	9.0%	0	0.0%	0	0.0%
Upper	6	33.3%	6,218	33.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	18	100.0%	18,424	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	100.0%	18,424	100.0%	18	100.0%	18,424	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	1.2%	400	1.0%	1	1.2%	208	0.5%
Moderate	20	24.7%	13,297	32.6%	9	11.1%	1,731	4.2%
Middle	29	35.8%	7,653	18.8%	15	18.5%	3,557	8.7%
Upper	31	38.3%	19,394	47.6%	23	28.4%	10,560	25.9%
Unknown	0	0.0%	0	0.0%	33	40.7%	24,688	60.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	81	100.0%	40,744	100.0%	81	100.0%	40,744	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	5	11.9%	1,442	8.1%	1	2.4%	89	0.5%
Moderate	11	26.2%	3,425	19.3%	2	4.8%	739	4.2%
Middle	13	31.0%	6,380	35.9%	3	7.1%	854	4.8%
Upper	13	31.0%	6,508	36.7%	15	35.7%	8,333	46.9%
Unknown	0	0.0%	0	0.0%	21	50.0%	7,740	43.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	17,755	100.0%	42	100.0%	17,755	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	5.6%	60	1.2%	1	5.6%	60	1.2%
Middle	11	61.1%	2,909	59.9%	1	5.6%	103	2.1%
Upper	6	33.3%	1,886	38.8%	12	66.7%	3,954	81.4%
Unknown	0	0.0%	0	0.0%	4	22.2%	738	15.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	100.0%	4,855	100.0%	18	100.0%	4,855	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	37.5%	1,874	42.4%	2	25.0%	150	3.4%
Middle	0	0.0%	0	0.0%	1	12.5%	250	5.7%
Upper	5	62.5%	2,550	57.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	62.5%	4,024	91.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	4,424	100.0%	8	100.0%	4,424	100.0%
Multi-Family								
Low	3	15.0%	19,425	32.7%	0	0.0%	0	0.0%
Moderate	7	35.0%	12,318	20.7%	0	0.0%	0	0.0%
Middle	4	20.0%	2,314	3.9%	0	0.0%	0	0.0%
Upper	5	25.0%	25,289	42.6%	0	0.0%	0	0.0%
Unknown	1	5.0%	72	0.1%	20	100.0%	59,419	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	59,419	100.0%	20	100.0%	59,419	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	8.0%	650	10.0%	0	0.0%	0	0.0%
Middle	11	44.0%	2,128	32.9%	4	16.0%	232	3.6%
Upper	12	48.0%	3,696	57.1%	19	76.0%	5,992	92.5%
Unknown	0	0.0%	0	0.0%	2	8.0%	250	3.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	6,474	100.0%	25	100.0%	6,474	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	14.3%	80	7.5%	3	42.9%	705	65.8%
Middle	5	71.4%	892	83.2%	2	28.6%	187	17.4%
Upper	1	14.3%	100	9.3%	2	28.6%	180	16.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	1,072	100.0%	7	100.0%	1,072	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	8	6.7%	20,867	22.2%	1	0.8%	89	0.1%
Moderate	25	20.8%	18,407	19.6%	8	6.7%	1,654	1.8%
Middle	44	36.7%	14,623	15.6%	11	9.2%	1,627	1.7%
Upper	42	35.0%	40,030	42.6%	48	40.0%	18,459	19.6%
Unknown	1	0.8%	72	0.1%	52	43.3%	72,171	76.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	120	100.0%	93,999	100.0%	120	100.0%	93,999	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	3	13.0%	497	4.8%	0	0.0%	0	0.0%
Moderate	4	17.4%	1,503	14.5%	1	4.3%	200	1.9%
Middle	7	30.4%	2,185	21.0%	4	17.4%	1,012	9.7%
Upper	9	39.1%	6,207	59.7%	14	60.9%	6,503	62.6%
Unknown	0	0.0%	0	0.0%	4	17.4%	2,677	25.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	10,392	100.0%	23	100.0%	10,392	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	5.9%	30	0.5%
Moderate	2	11.8%	505	9.1%	1	5.9%	250	4.5%
Middle	8	47.1%	2,800	50.3%	0	0.0%	0	0.0%
Upper	7	41.2%	2,265	40.7%	7	41.2%	2,710	48.7%
Unknown	0	0.0%	0	0.0%	8	47.1%	2,580	46.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	5,570	100.0%	17	100.0%	5,570	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	16.7%	143	3.9%
Moderate	1	16.7%	300	8.1%	1	16.7%	100	2.7%
Middle	3	50.0%	1,813	48.8%	1	16.7%	220	5.9%
Upper	2	33.3%	1,600	43.1%	1	16.7%	1,500	40.4%
Unknown	0	0.0%	0	0.0%	2	33.3%	1,750	47.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	3,713	100.0%	6	100.0%	3,713	100.0%
Multi-Family								
Low	1	14.3%	1,200	12.6%	0	0.0%	0	0.0%
Moderate	3	42.9%	3,175	33.4%	0	0.0%	0	0.0%
Middle	2	28.6%	1,850	19.5%	0	0.0%	0	0.0%
Upper	1	14.3%	3,280	34.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	7	100.0%	9,505	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	9,505	100.0%	7	100.0%	9,505	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	6.3%	496	14.2%	1	6.3%	31	0.9%
Middle	8	50.0%	1,537	43.9%	4	25.0%	956	27.3%
Upper	7	43.8%	1,468	41.9%	11	68.8%	2,514	71.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	3,501	100.0%	16	100.0%	3,501	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2023 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	125	100.0%	1	100.0%	125	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	125	100.0%	1	100.0%	125	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	4	5.7%	1,697	5.2%	2	2.9%	173	0.5%
Moderate	11	15.7%	5,979	18.2%	4	5.7%	581	1.8%
Middle	29	41.4%	10,310	31.4%	10	14.3%	2,313	7.1%
Upper	26	37.1%	14,819	45.2%	33	47.1%	13,227	40.3%
Unknown	0	0.0%	0	0.0%	21	30.0%	16,512	50.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	32,806	100.0%	70	100.0%	32,806	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	3	5.9%	329	3.3%
Moderate	1	2.0%	76	0.8%	8	15.7%	1,112	11.0%
Middle	46	90.2%	8,775	87.1%	13	25.5%	1,705	16.9%
Upper	4	7.8%	1,224	12.1%	24	47.1%	6,514	64.7%
Unknown	0	0.0%	0	0.0%	3	5.9%	414	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	51	100.0%	10,075	100.0%	51	100.0%	10,075	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	3.6%	132	1.4%
Moderate	0	0.0%	0	0.0%	8	14.5%	967	10.6%
Middle	53	96.4%	8,848	96.7%	15	27.3%	1,753	19.2%
Upper	2	3.6%	303	3.3%	29	52.7%	6,151	67.2%
Unknown	0	0.0%	0	0.0%	1	1.8%	148	1.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	9,151	100.0%	55	100.0%	9,151	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	25	16.1%
Middle	3	100.0%	155	100.0%	1	33.3%	115	74.2%
Upper	0	0.0%	0	0.0%	1	33.3%	15	9.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	155	100.0%	3	100.0%	155	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	40	58.8%
Middle	2	100.0%	68	100.0%	1	50.0%	28	41.2%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	68	100.0%	2	100.0%	68	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	5	4.5%	461	2.4%
Moderate	1	0.9%	76	0.4%	18	16.2%	2,144	11.0%
Middle	104	93.7%	17,846	91.8%	30	27.0%	3,601	18.5%
Upper	6	5.4%	1,527	7.8%	54	48.6%	12,680	65.2%
Unknown	0	0.0%	0	0.0%	4	3.6%	562	2.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	111	100.0%	19,448	100.0%	111	100.0%	19,448	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	2.0%	70	0.7%
Moderate	1	2.0%	100	1.1%	8	16.0%	951	10.1%
Middle	37	74.0%	7,096	75.2%	14	28.0%	2,197	23.3%
Upper	12	24.0%	2,245	23.8%	25	50.0%	6,006	63.6%
Unknown	0	0.0%	0	0.0%	2	4.0%	217	2.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	9,441	100.0%	50	100.0%	9,441	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	10.0%	54	2.2%
Moderate	0	0.0%	0	0.0%	6	30.0%	582	23.4%
Middle	19	95.0%	2,243	90.0%	6	30.0%	555	22.3%
Upper	1	5.0%	250	10.0%	5	25.0%	1,149	46.1%
Unknown	0	0.0%	0	0.0%	1	5.0%	153	6.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	2,493	100.0%	20	100.0%	2,493	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	16.7%	60	9.2%
Moderate	0	0.0%	0	0.0%	2	16.7%	85	13.1%
Middle	10	83.3%	525	80.8%	2	16.7%	225	34.6%
Upper	2	16.7%	125	19.2%	4	33.3%	195	30.0%
Unknown	0	0.0%	0	0.0%	2	16.7%	85	13.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	650	100.0%	12	100.0%	650	100.0%
Multi-Family								
Low	1	50.0%	214	6.7%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	3,000	93.3%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	3,214	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	3,214	100.0%	2	100.0%	3,214	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	4	19.0%	140	10.5%
Moderate	0	0.0%	0	0.0%	6	28.6%	210	15.8%
Middle	16	76.2%	952	71.5%	4	19.0%	342	25.7%
Upper	5	23.8%	380	28.5%	7	33.3%	640	48.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	1,332	100.0%	21	100.0%	1,332	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	41	16.8%
Middle	1	33.3%	150	62.4%	1	33.3%	50	20.8%
Upper	2	66.7%	91	37.6%	1	33.3%	150	62.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	241	100.0%	3	100.0%	241	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	0.9%	214	1.2%	9	8.3%	324	1.9%
Moderate	1	0.9%	100	0.6%	23	21.3%	1,869	10.8%
Middle	84	77.8%	13,966	80.4%	27	25.0%	3,369	19.4%
Upper	22	20.4%	3,090	17.8%	42	38.9%	8,139	46.9%
Unknown	0	0.0%	0	0.0%	7	6.5%	3,669	21.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	108	100.0%	17,370	100.0%	108	100.0%	17,370	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	3.4%	79	1.7%	1	3.4%	43	0.9%
Moderate	1	3.4%	88	1.9%	3	10.3%	413	9.0%
Middle	22	75.9%	3,830	84.0%	8	27.6%	1,263	27.7%
Upper	5	17.2%	565	12.4%	16	55.2%	2,753	60.4%
Unknown	0	0.0%	0	0.0%	1	3.4%	90	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	4,562	100.0%	29	100.0%	4,562	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	11.1%	25	3.7%
Moderate	0	0.0%	0	0.0%	2	22.2%	142	21.0%
Middle	6	66.7%	489	72.3%	1	11.1%	125	18.5%
Upper	3	33.3%	187	27.7%	4	44.4%	367	54.3%
Unknown	0	0.0%	0	0.0%	1	11.1%	17	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	676	100.0%	9	100.0%	676	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	18.2%	60	13.9%
Moderate	1	9.1%	10	2.3%	3	27.3%	154	35.7%
Middle	8	72.7%	349	81.0%	3	27.3%	77	17.9%
Upper	2	18.2%	72	16.7%	3	27.3%	140	32.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	431	100.0%	11	100.0%	431	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	2	15.4%	135	13.4%
Moderate	0	0.0%	0	0.0%	2	15.4%	75	7.4%
Middle	7	53.8%	624	62.0%	5	38.5%	350	34.8%
Upper	6	46.2%	383	38.0%	4	30.8%	447	44.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,007	100.0%	13	100.0%	1,007	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2023 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	17	8.6%
Middle	2	100.0%	192	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	175	91.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	192	100.0%	2	100.0%	192	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	1.6%	79	1.2%	6	9.4%	263	3.8%
Moderate	2	3.1%	98	1.4%	11	17.2%	800	11.6%
Middle	45	70.3%	5,483	79.8%	17	26.6%	1,815	26.4%
Upper	16	25.0%	1,207	17.6%	28	43.8%	3,883	56.5%
Unknown	0	0.0%	0	0.0%	2	3.1%	107	1.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	64	100.0%	6,867	100.0%	64	100.0%	6,867	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 HMDA LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	289	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	289	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	289	100.0%	1	100.0%	289	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	100.0%	45	100.0%
Moderate	1	100.0%	45	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	45	100.0%	1	100.0%	45	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	430	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	430	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	430	100.0%	1	100.0%	430	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	1	33.3%	45	5.9%
Moderate	1	33.3%	45	5.9%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	66.7%	719	94.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	66.7%	719	94.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	764	100.0%	3	100.0%	764	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 HMDA LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	250	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	250	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	250	100.0%	1	100.0%	250	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	250	100.0%	1	100.0%	250	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	250	100.0%	1	100.0%	250	100.0%
Home Improvement								
Low	1	100.0%	43	100.0%	1	100.0%	43	100.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	43	100.0%	1	100.0%	43	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	835	82.7%	0	0.0%	0	0.0%
Upper	1	50.0%	175	17.3%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	1,010	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	1,010	100.0%	2	100.0%	1,010	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	432	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	432	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	432	100.0%	1	100.0%	432	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	16.7%	43	2.1%	1	16.7%	43	2.1%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	50.0%	1,517	76.5%	0	0.0%	0	0.0%
Upper	2	33.3%	425	21.4%	3	50.0%	932	47.0%
Unknown	0	0.0%	0	0.0%	2	33.3%	1,010	50.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	1,985	100.0%	6	100.0%	1,985	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 HMDA LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	331	100.0%	1	50.0%	311	94.0%
Upper	0	0.0%	0	0.0%	1	50.0%	20	6.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	331	100.0%	2	100.0%	331	100.0%
Refinance								
Low	1	33.3%	80	20.5%	1	33.3%	80	20.5%
Moderate	0	0.0%	0	0.0%	1	33.3%	210	53.8%
Middle	1	33.3%	100	25.6%	0	0.0%	0	0.0%
Upper	1	33.3%	210	53.8%	1	33.3%	100	25.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	390	100.0%	3	100.0%	390	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	150	100.0%	1	100.0%	150	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	150	100.0%	1	100.0%	150	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2023 HMDA LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	16.7%	80	9.2%	1	16.7%	80	9.2%
Moderate	0	0.0%	0	0.0%	1	16.7%	210	24.1%
Middle	3	50.0%	431	49.5%	1	16.7%	311	35.7%
Upper	2	33.3%	360	41.3%	3	50.0%	270	31.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	871	100.0%	6	100.0%	871	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	50.0%	93	43.2%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	122	56.8%	1	50.0%	122	56.8%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	50.0%	93	43.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	214	100.0%	2	100.0%	214	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	50.0%	93	43.2%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	122	56.8%	1	50.0%	122	56.8%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	50.0%	93	43.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	214	100.0%	2	100.0%	214	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	33.3%	125	26.8%	0	0.0%	0	0.0%
Moderate	2	66.7%	342	73.2%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	1	33.3%	92	19.7%
Upper	0	0.0%	0	0.0%	1	33.3%	250	53.5%
Unknown	0	0.0%	0	0.0%	1	33.3%	125	26.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	467	100.0%	3	100.0%	467	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	500	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	500	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	500	100.0%	1	100.0%	500	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	25.0%	125	12.9%	0	0.0%	0	0.0%
Moderate	2	50.0%	342	35.4%	0	0.0%	0	0.0%
Middle	1	25.0%	500	51.7%	1	25.0%	92	9.5%
Upper	0	0.0%	0	0.0%	1	25.0%	250	25.9%
Unknown	0	0.0%	0	0.0%	2	50.0%	625	64.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	967	100.0%	4	100.0%	967	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	16.7%	215	19.9%	1	16.7%	49	4.5%
Middle	4	66.7%	793	73.4%	2	33.3%	287	26.6%
Upper	1	16.7%	72	6.7%	2	33.3%	580	53.7%
Unknown	0	0.0%	0	0.0%	1	16.7%	164	15.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	1,080	100.0%	6	100.0%	1,080	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	95	24.7%	0	0.0%	0	0.0%
Middle	1	50.0%	290	75.3%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	100.0%	385	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	385	100.0%	2	100.0%	385	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	95	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	95	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	95	100.0%	1	100.0%	95	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2023 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	56	100.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	56	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	56	100.0%	1	100.0%	56	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	20.0%	310	19.2%	2	20.0%	104	6.5%
Middle	6	60.0%	1,178	72.9%	2	20.0%	287	17.8%
Upper	2	20.0%	128	7.9%	5	50.0%	1,060	65.6%
Unknown	0	0.0%	0	0.0%	1	10.0%	164	10.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	1,616	100.0%	10	100.0%	1,616	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 HMDA LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	6.3%	32	1.4%	2	12.5%	284	12.3%
Middle	14	87.5%	2,049	88.6%	3	18.8%	494	21.4%
Upper	1	6.3%	230	10.0%	11	68.8%	1,533	66.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	2,311	100.0%	16	100.0%	2,311	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	12.5%	70	7.5%
Moderate	0	0.0%	0	0.0%	1	12.5%	128	13.7%
Middle	8	100.0%	939	100.0%	1	12.5%	70	7.5%
Upper	0	0.0%	0	0.0%	5	62.5%	671	71.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	939	100.0%	8	100.0%	939	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	18	54.5%
Middle	2	100.0%	33	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	15	45.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	33	100.0%	2	100.0%	33	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	1	3.8%	70	2.1%
Moderate	1	3.8%	32	1.0%	4	15.4%	430	13.1%
Middle	24	92.3%	3,021	92.0%	4	15.4%	564	17.2%
Upper	1	3.8%	230	7.0%	17	65.4%	2,219	67.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	3,283	100.0%	26	100.0%	3,283	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 HMDA LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	6.3%	76	2.3%
Moderate	0	0.0%	0	0.0%	3	18.8%	401	12.3%
Middle	13	81.3%	2,658	81.7%	4	25.0%	597	18.4%
Upper	3	18.8%	596	18.3%	7	43.8%	2,144	65.9%
Unknown	0	0.0%	0	0.0%	1	6.3%	36	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	3,254	100.0%	16	100.0%	3,254	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	25.0%	143	11.0%
Middle	11	91.7%	1,120	86.0%	5	41.7%	461	35.3%
Upper	1	8.3%	183	14.0%	4	33.3%	700	53.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	1,303	100.0%	12	100.0%	1,303	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	33.3%	20	25.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	80	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	66.7%	60	75.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	80	100.0%	3	100.0%	80	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	125	71.4%
Middle	3	100.0%	175	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	33.3%	30	17.1%
Unknown	0	0.0%	0	0.0%	1	33.3%	20	11.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	175	100.0%	3	100.0%	175	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	100.0%	45	100.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	45	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	45	100.0%	1	100.0%	45	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	3	8.6%	141	2.9%
Moderate	0	0.0%	0	0.0%	7	20.0%	669	13.8%
Middle	31	88.6%	4,078	84.0%	9	25.7%	1,058	21.8%
Upper	4	11.4%	779	16.0%	14	40.0%	2,933	60.4%
Unknown	0	0.0%	0	0.0%	2	5.7%	56	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	4,857	100.0%	35	100.0%	4,857	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 HMDA LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	5.3%	36	1.1%
Moderate	1	5.3%	36	1.1%	4	21.1%	396	11.7%
Middle	14	73.7%	2,072	61.4%	4	21.1%	832	24.7%
Upper	4	21.1%	1,267	37.5%	6	31.6%	1,665	49.3%
Unknown	0	0.0%	0	0.0%	4	21.1%	446	13.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	3,375	100.0%	19	100.0%	3,375	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	115	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	115	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	115	100.0%	1	100.0%	115	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	50.0%	11	19.1%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	56	100.0%	1	50.0%	45	80.9%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	56	100.0%	2	100.0%	56	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	78	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	78	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	78	100.0%	1	100.0%	78	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	1	25.0%	20	18.5%
Moderate	1	25.0%	14	13.0%	0	0.0%	0	0.0%
Middle	2	50.0%	63	58.3%	0	0.0%	0	0.0%
Upper	1	25.0%	31	28.7%	3	75.0%	88	81.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	108	100.0%	4	100.0%	108	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

CONTINUED- 2023 HMDA LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	82	100.0%	1	100.0%	82	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	82	100.0%	1	100.0%	82	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	3	10.7%	67	1.8%
Moderate	3	10.7%	128	3.4%	4	14.3%	396	10.4%
Middle	20	71.4%	2,388	62.6%	6	21.4%	960	25.2%
Upper	5	17.9%	1,298	34.0%	10	35.7%	1,868	49.0%
Unknown	0	0.0%	0	0.0%	5	17.9%	524	13.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	3,814	100.0%	28	100.0%	3,814	100.0%

CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	466	96.5%	31,561	94.2%	45	100.0%	902	100.0%
Upper	17	3.5%	1,947	5.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	483	100.0%	33,508	100.0%	45	100.0%	902	100.0%
By Revenue								
Total \$1 Million or Less	339	70.2%	12,829	38.3%	44	97.8%	794	88.0%
Over \$1 Million	127	26.3%	19,976	59.6%	1	2.2%	108	12.0%
Not Known	17	3.5%	703	2.1%	0	0.0%	0	0.0%
Total	483	100.0%	33,508	100.0%	45	100.0%	902	100.0%
By Loan Size								
\$100,000 or less	402	83.2%	11,250	33.6%	43	95.6%	669	74.2%
\$100,001 - \$250,000	55	11.4%	8,553	25.5%	2	4.4%	233	25.8%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	26	5.4%	13,705	40.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	483	100.0%	33,508	100.0%	45	100.0%	902	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	317	93.5%	7,544	58.8%	43	97.7%	669	84.3%
\$100,001 - \$250,000	17	5.0%	2,701	21.1%	1	2.3%	125	15.7%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	1.5%	2,584	20.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	339	100.0%	12,829	100.0%	44	100.0%	794	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	2.2%	498	2.4%	1	6.7%	30	6.0%
Middle	181	97.3%	20,346	97.1%	14	93.3%	470	94.0%
Upper	1	0.5%	100	0.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	186	100.0%	20,944	100.0%	15	100.0%	500	100.0%
By Revenue								
Total \$1 Million or Less	107	57.5%	8,057	38.5%	13	86.7%	475	95.0%
Over \$1 Million	77	41.4%	12,851	61.4%	0	0.0%	0	0.0%
Not Known	2	1.1%	36	0.2%	2	13.3%	25	5.0%
Total	186	100.0%	20,944	100.0%	15	100.0%	500	100.0%
By Loan Size								
\$100,000 or less	130	69.9%	5,074	24.2%	14	93.3%	320	64.0%
\$100,001 - \$250,000	34	18.3%	5,419	25.9%	1	6.7%	180	36.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	22	11.8%	10,451	49.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	186	100.0%	20,944	100.0%	15	100.0%	500	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	86	80.4%	3,320	41.2%	12	92.3%	295	62.1%
\$100,001 - \$250,000	17	15.9%	2,667	33.1%	1	7.7%	180	37.9%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	3.7%	2,070	25.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	107	100.0%	8,057	100.0%	13	100.0%	475	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PA NON-MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	3.9%	737	5.6%	3	15.0%	115	19.9%
Middle	145	95.4%	12,428	94.3%	17	85.0%	463	80.1%
Upper	1	0.7%	10	0.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	152	100.0%	13,175	100.0%	20	100.0%	578	100.0%
By Revenue								
Total \$1 Million or Less	90	59.2%	5,850	44.4%	12	60.0%	449	77.7%
Over \$1 Million	60	39.5%	7,312	55.5%	0	0.0%	0	0.0%
Not Known	2	1.3%	13	0.1%	8	40.0%	129	22.3%
Total	152	100.0%	13,175	100.0%	20	100.0%	578	100.0%
By Loan Size								
\$100,000 or less	118	77.6%	4,897	37.2%	20	100.0%	578	100.0%
\$100,001 - \$250,000	23	15.1%	4,003	30.4%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	11	7.2%	4,275	32.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	152	100.0%	13,175	100.0%	20	100.0%	578	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	75	83.3%	2,923	50.0%	12	100.0%	449	100.0%
\$100,001 - \$250,000	11	12.2%	1,840	31.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	4.4%	1,087	18.6%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	90	100.0%	5,850	100.0%	12	100.0%	449	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	8	2.1%	980	1.8%	0	0.0%	0	0.0%
Moderate	56	14.4%	12,250	22.6%	0	0.0%	0	0.0%
Middle	169	43.4%	22,719	41.9%	2	100.0%	34	100.0%
Upper	155	39.8%	18,105	33.4%	0	0.0%	0	0.0%
Unknown	1	0.3%	120	0.2%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	389	100.0%	54,174	100.0%	2	100.0%	34	100.0%
By Revenue								
Total \$1 Million or Less	219	56.3%	20,368	37.6%	2	100.0%	34	100.0%
Over \$1 Million	144	37.0%	32,089	59.2%	0	0.0%	0	0.0%
Not Known	26	6.7%	1,717	3.2%	0	0.0%	0	0.0%
Total	389	100.0%	54,174	100.0%	2	100.0%	34	100.0%
By Loan Size								
\$100,000 or less	247	63.5%	10,474	19.3%	2	100.0%	34	100.0%
\$100,001 - \$250,000	73	18.8%	12,225	22.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	69	17.7%	31,475	58.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	389	100.0%	54,174	100.0%	2	100.0%	34	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	172	78.5%	6,065	29.8%	2	100.0%	34	100.0%
\$100,001 - \$250,000	24	11.0%	4,002	19.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	23	10.5%	10,301	50.6%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	219	100.0%	20,368	100.0%	2	100.0%	34	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	1	0.9%	236	0.7%	0	0.0%	0	0.0%
Moderate	15	13.8%	4,012	12.5%	0	0.0%	0	0.0%
Middle	58	53.2%	16,596	51.7%	0	0.0%	0	0.0%
Upper	35	32.1%	11,280	35.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	32,124	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	53	48.6%	15,135	47.1%	0	0.0%	0	0.0%
Over \$1 Million	56	51.4%	16,989	52.9%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	32,124	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	37	33.9%	1,546	4.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	28	25.7%	5,214	16.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	44	40.4%	25,364	79.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	32,124	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	19	35.8%	557	3.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	13	24.5%	2,467	16.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	21	39.6%	12,111	80.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	53	100.0%	15,135	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	1	0.9%	765	2.7%	0	0.0%	0	0.0%
Moderate	26	23.9%	8,966	31.5%	0	0.0%	0	0.0%
Middle	52	47.7%	13,268	46.7%	0	0.0%	0	0.0%
Upper	28	25.7%	4,961	17.4%	0	0.0%	0	0.0%
Unknown	2	1.8%	471	1.7%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	28,431	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	50	45.9%	11,948	42.0%	0	0.0%	0	0.0%
Over \$1 Million	59	54.1%	16,483	58.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	28,431	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	47	43.1%	2,545	9.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	24	22.0%	4,421	15.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	38	34.9%	21,465	75.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	28,431	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	24	48.0%	1,292	10.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	11	22.0%	2,129	17.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	15	30.0%	8,527	71.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	11,948	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	4	4.8%	1,214	12.9%	0	0.0%	0	0.0%
Moderate	9	10.8%	591	6.3%	0	0.0%	0	0.0%
Middle	66	79.5%	5,841	62.0%	3	100.0%	52	100.0%
Upper	4	4.8%	1,776	18.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	83	100.0%	9,422	100.0%	3	100.0%	52	100.0%
By Revenue								
Total \$1 Million or Less	58	69.9%	2,850	30.2%	3	100.0%	52	100.0%
Over \$1 Million	21	25.3%	5,361	56.9%	0	0.0%	0	0.0%
Not Known	4	4.8%	1,211	12.9%	0	0.0%	0	0.0%
Total	83	100.0%	9,422	100.0%	3	100.0%	52	100.0%
By Loan Size								
\$100,000 or less	58	69.9%	1,582	16.8%	3	100.0%	52	100.0%
\$100,001 - \$250,000	16	19.3%	2,476	26.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	9	10.8%	5,364	56.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	83	100.0%	9,422	100.0%	3	100.0%	52	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	50	86.2%	1,235	43.3%	3	100.0%	52	100.0%
\$100,001 - \$250,000	6	10.3%	815	28.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	3.4%	800	28.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	58	100.0%	2,850	100.0%	3	100.0%	52	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	3	11.5%	346	15.5%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	19	73.1%	1,454	65.2%	3	100.0%	320	100.0%
Upper	2	7.7%	85	3.8%	0	0.0%	0	0.0%
Unknown	2	7.7%	345	15.5%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	2,230	100.0%	3	100.0%	320	100.0%
By Revenue								
Total \$1 Million or Less	21	80.8%	1,777	79.7%	3	100.0%	320	100.0%
Over \$1 Million	4	15.4%	443	19.9%	0	0.0%	0	0.0%
Not Known	1	3.8%	10	0.4%	0	0.0%	0	0.0%
Total	26	100.0%	2,230	100.0%	3	100.0%	320	100.0%
By Loan Size								
\$100,000 or less	18	69.2%	754	33.8%	2	66.7%	20	6.3%
\$100,001 - \$250,000	7	26.9%	1,156	51.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	3.8%	320	14.3%	1	33.3%	300	93.8%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	2,230	100.0%	3	100.0%	320	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	14	66.7%	551	31.0%	2	66.7%	20	6.3%
\$100,001 - \$250,000	6	28.6%	906	51.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	4.8%	320	18.0%	1	33.3%	300	93.8%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	1,777	100.0%	3	100.0%	320	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 SMALL BUSINESS LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	1	3.8%	640	14.7%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	23	88.5%	3,198	73.7%	2	100.0%	30	100.0%
Upper	1	3.8%	3	0.1%	0	0.0%	0	0.0%
Unknown	1	3.8%	500	11.5%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	4,341	100.0%	2	100.0%	30	100.0%
By Revenue								
Total \$1 Million or Less	17	65.4%	1,652	38.1%	2	100.0%	30	100.0%
Over \$1 Million	9	34.6%	2,689	61.9%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	4,341	100.0%	2	100.0%	30	100.0%
By Loan Size								
\$100,000 or less	17	65.4%	475	10.9%	2	100.0%	30	100.0%
\$100,001 - \$250,000	1	3.8%	125	2.9%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	30.8%	3,741	86.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	4,341	100.0%	2	100.0%	30	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	13	76.5%	371	22.5%	2	100.0%	30	100.0%
\$100,001 - \$250,000	1	5.9%	125	7.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	17.6%	1,156	70.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	1,652	100.0%	2	100.0%	30	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	12	80.0%	2,910	72.6%	0	0.0%	0	0.0%
Upper	3	20.0%	1,100	27.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	4,010	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	10	66.7%	3,258	81.2%	0	0.0%	0	0.0%
Over \$1 Million	5	33.3%	752	18.8%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	4,010	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	5	33.3%	308	7.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	20.0%	559	13.9%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	46.7%	3,143	78.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	4,010	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	3	30.0%	208	6.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	10.0%	223	6.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	60.0%	2,827	86.8%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	3,258	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	37.5%	1,440	61.2%	0	0.0%	0	0.0%
Upper	5	62.5%	913	38.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	2,353	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	4	50.0%	1,528	64.9%	0	0.0%	0	0.0%
Over \$1 Million	4	50.0%	825	35.1%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	2,353	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	4	50.0%	213	9.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	50.0%	2,140	90.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	2,353	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	1	25.0%	88	5.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	75.0%	1,440	94.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,528	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 SMALL BUSINESS LOAN DISTRIBUTION TABLE (YORK, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	66.7%	790	98.8%	0	0.0%	0	0.0%
Upper	1	33.3%	10	1.3%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	800	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	2	66.7%	100	12.5%	0	0.0%	0	0.0%
Over \$1 Million	1	33.3%	700	87.5%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	800	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	2	66.7%	100	12.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	33.3%	700	87.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	800	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	2	100.0%	100	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	100	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	16.7%	770	56.4%	0	0.0%	0	0.0%
Middle	3	50.0%	336	24.6%	0	0.0%	0	0.0%
Upper	2	33.3%	260	19.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	1,366	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	2	33.3%	780	57.1%	0	0.0%	0	0.0%
Over \$1 Million	4	66.7%	586	42.9%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	1,366	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	2	33.3%	83	6.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	50.0%	513	37.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	16.7%	770	56.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	1,366	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	1	50.0%	10	1.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	50.0%	770	98.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	780	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	5	71.4%	3,201	90.4%	0	0.0%	0	0.0%
Upper	2	28.6%	340	9.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	3,541	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	3	42.9%	1,191	33.6%	0	0.0%	0	0.0%
Over \$1 Million	4	57.1%	2,350	66.4%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	3,541	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	1	14.3%	50	1.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	14.3%	113	3.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	71.4%	3,378	95.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	3,541	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	33.3%	113	9.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	66.7%	1,078	90.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	1,191	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	3	27.3%	1,140	35.9%	0	0.0%	0	0.0%
Moderate	1	9.1%	268	8.4%	0	0.0%	0	0.0%
Middle	7	63.6%	1,767	55.7%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	3,175	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	5	45.5%	1,640	51.7%	0	0.0%	0	0.0%
Over \$1 Million	6	54.5%	1,535	48.3%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	3,175	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	3	27.3%	189	6.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	18.2%	350	11.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	54.5%	2,636	83.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	3,175	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	40.0%	350	21.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	60.0%	1,290	78.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	1,640	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	10.8%	270	12.9%	1	7.1%	21	8.5%
Middle	30	81.1%	1,480	70.7%	13	92.9%	225	91.5%
Upper	3	8.1%	342	16.3%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	37	100.0%	2,092	100.0%	14	100.0%	246	100.0%
By Revenue								
Total \$1 Million or Less	24	64.9%	970	46.4%	14	100.0%	246	100.0%
Over \$1 Million	12	32.4%	1,084	51.8%	0	0.0%	0	0.0%
Not Known	1	2.7%	38	1.8%	0	0.0%	0	0.0%
Total	37	100.0%	2,092	100.0%	14	100.0%	246	100.0%
By Loan Size								
\$100,000 or less	30	81.1%	739	35.3%	14	100.0%	246	100.0%
\$100,001 - \$250,000	6	16.2%	953	45.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	2.7%	400	19.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	37	100.0%	2,092	100.0%	14	100.0%	246	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	20	83.3%	344	35.5%	14	100.0%	246	100.0%
\$100,001 - \$250,000	4	16.7%	626	64.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	970	100.0%	14	100.0%	246	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	14	51.9%	1,259	32.0%	0	0.0%	0	0.0%
Middle	13	48.1%	2,673	68.0%	2	100.0%	151	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	3,932	100.0%	2	100.0%	151	100.0%
By Revenue								
Total \$1 Million or Less	10	37.0%	922	23.4%	2	100.0%	151	100.0%
Over \$1 Million	17	63.0%	3,010	76.6%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	3,932	100.0%	2	100.0%	151	100.0%
By Loan Size								
\$100,000 or less	20	74.1%	765	19.5%	1	50.0%	21	13.9%
\$100,001 - \$250,000	1	3.7%	200	5.1%	1	50.0%	130	86.1%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	22.2%	2,967	75.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	3,932	100.0%	2	100.0%	151	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	8	80.0%	372	40.3%	1	50.0%	21	13.9%
\$100,001 - \$250,000	1	10.0%	200	21.7%	1	50.0%	130	86.1%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	10.0%	350	38.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	922	100.0%	2	100.0%	151	100.0%

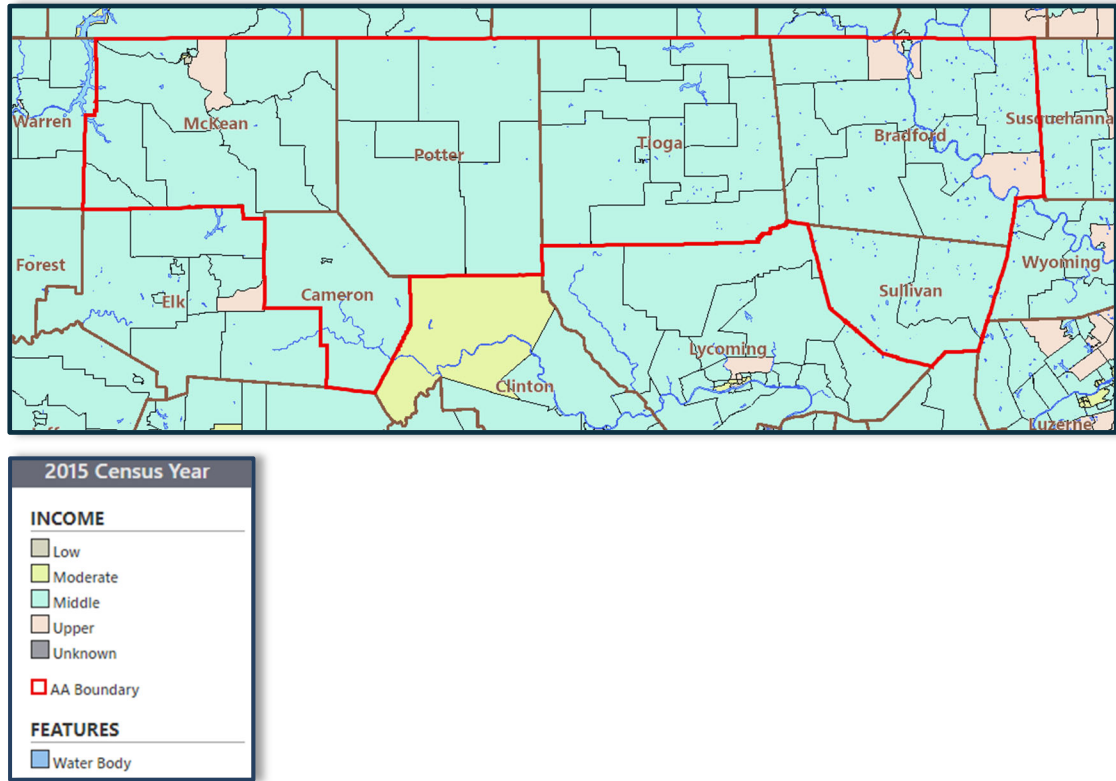
LARGE INSTITUTION PERFORMANCE EVALUATION
NOVEMBER 2024

2023 SMALL BUSINESS LOAN DISTRIBUTION TABLE (NY NON-MSA ASSESSMENT AREA)

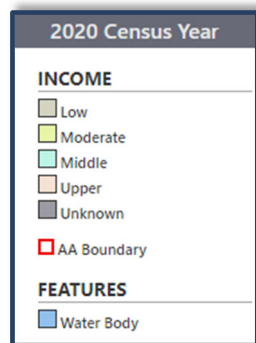
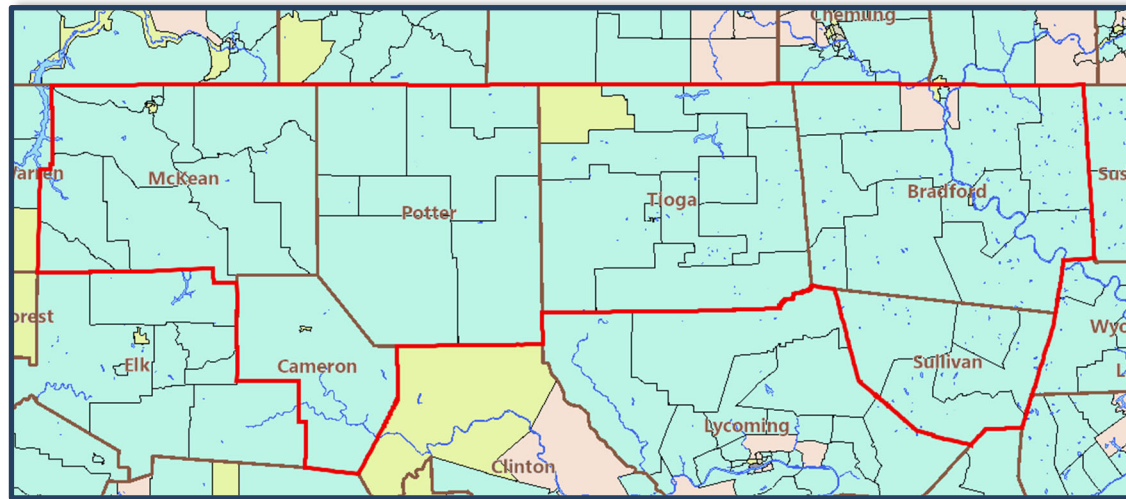
Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	70	4.5%	0	0.0%	0	0.0%
Middle	3	75.0%	1,495	95.5%	2	100.0%	38	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,565	100.0%	2	100.0%	38	100.0%
By Revenue								
Total \$1 Million or Less	2	50.0%	105	6.7%	1	50.0%	25	65.8%
Over \$1 Million	2	50.0%	1,460	93.3%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	1	50.0%	13	34.2%
Total	4	100.0%	1,565	100.0%	2	100.0%	38	100.0%
By Loan Size								
\$100,000 or less	2	50.0%	105	6.7%	2	100.0%	38	100.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	50.0%	1,460	93.3%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,565	100.0%	2	100.0%	38	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	2	100.0%	105	100.0%	1	100.0%	25	100.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	105	100.0%	1	100.0%	25	100.0%

CRA APPENDIX F: ASSESSMENT AREA MAPS

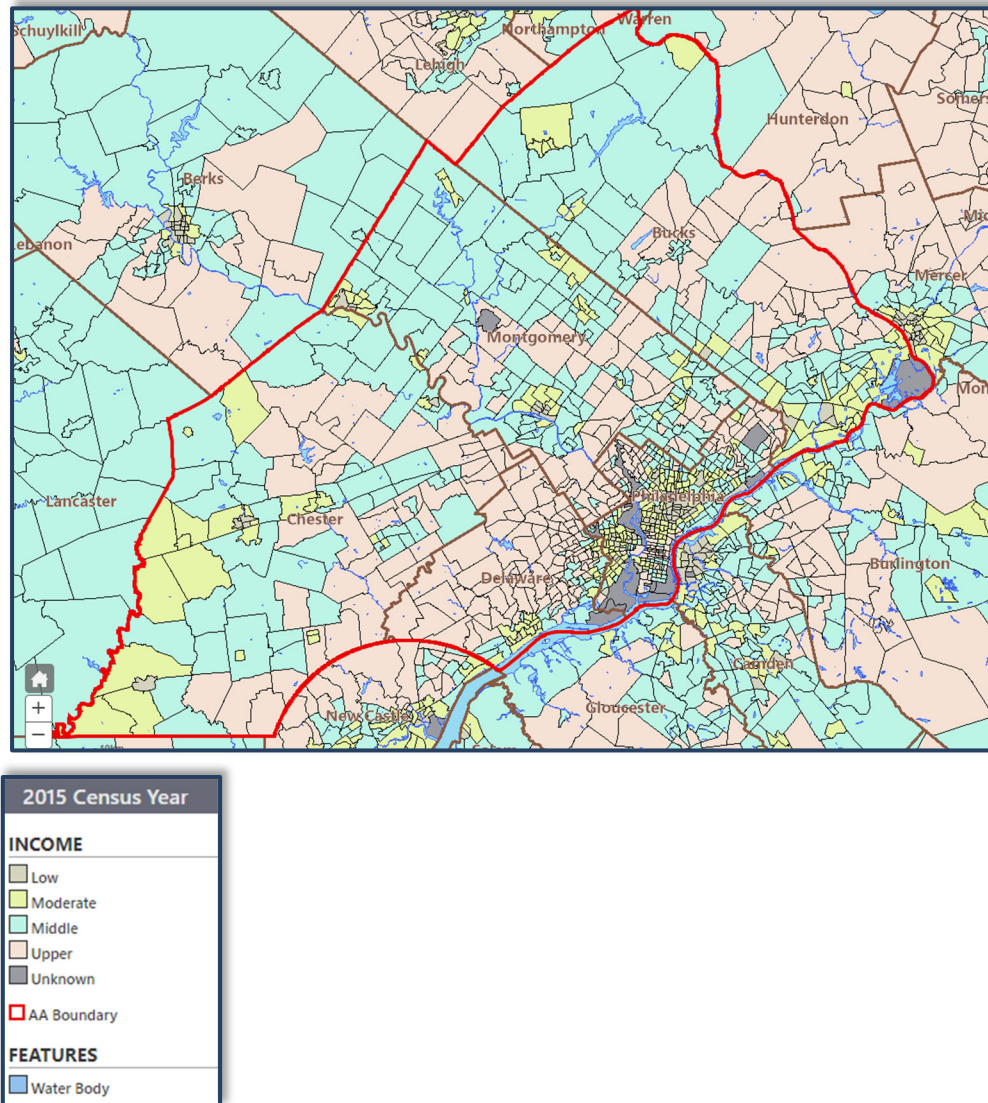
PA NON-MSA ASSESSMENT AREA (2015 ACS DATA)



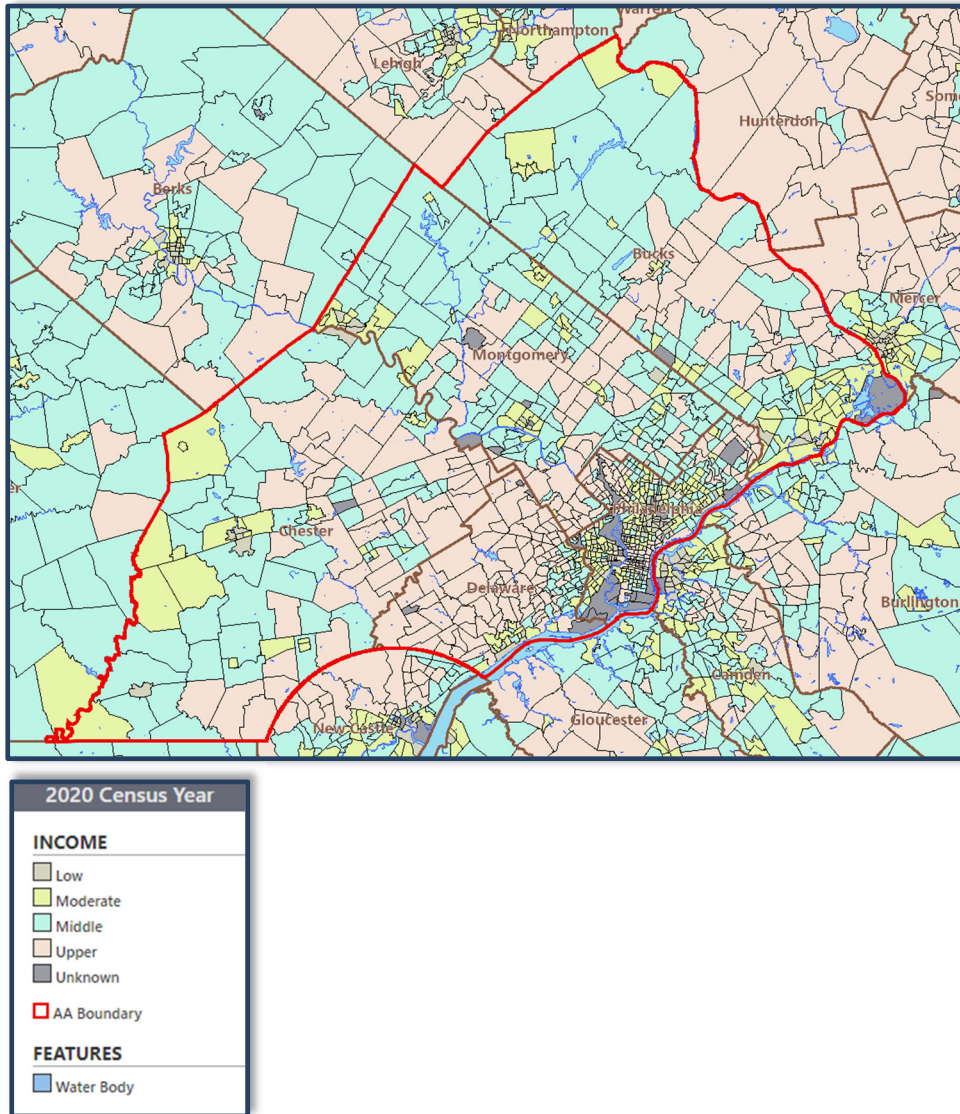
PA NON-MSA ASSESSMENT AREA (2020 CENSUS DATA)



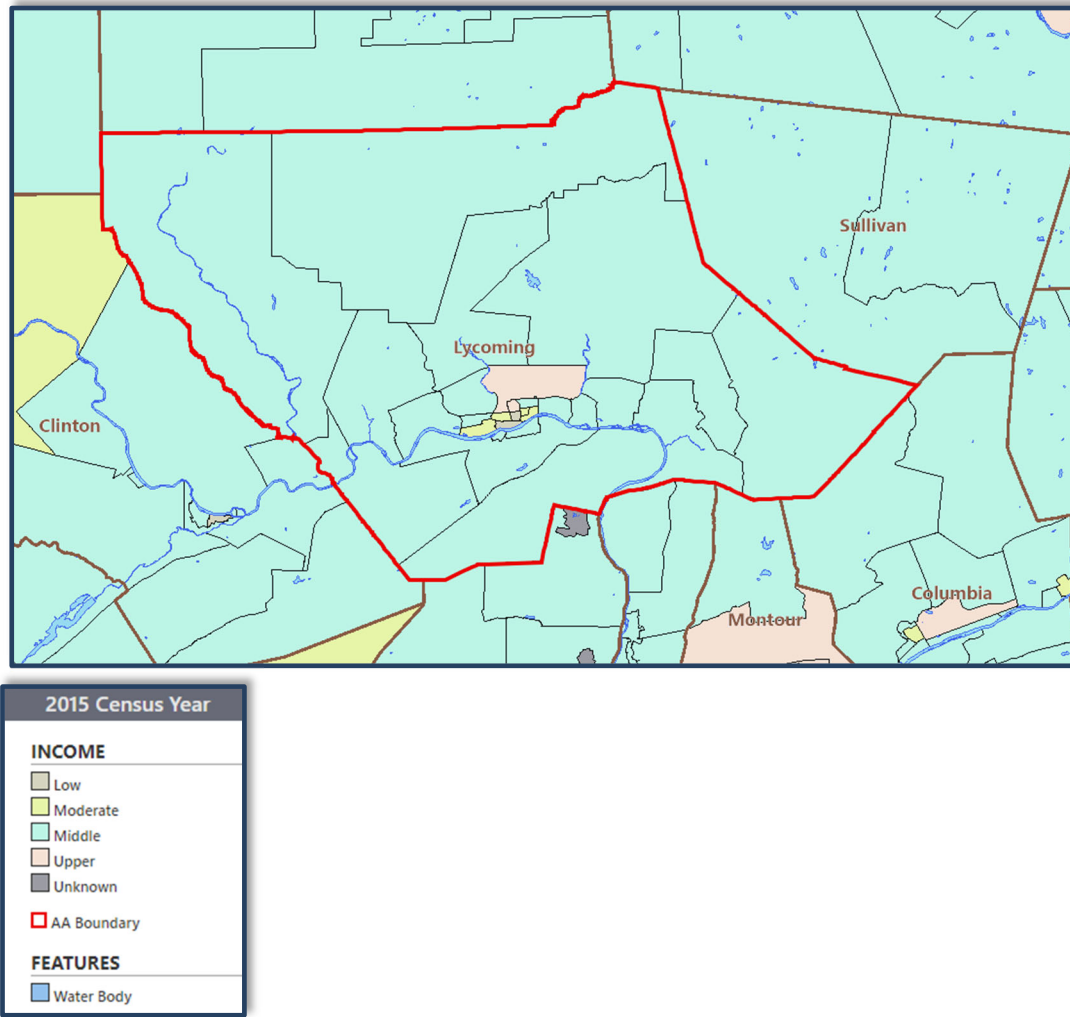
PHILADELPHIA, PA ASSESSMENT AREA (2015 ACS DATA)



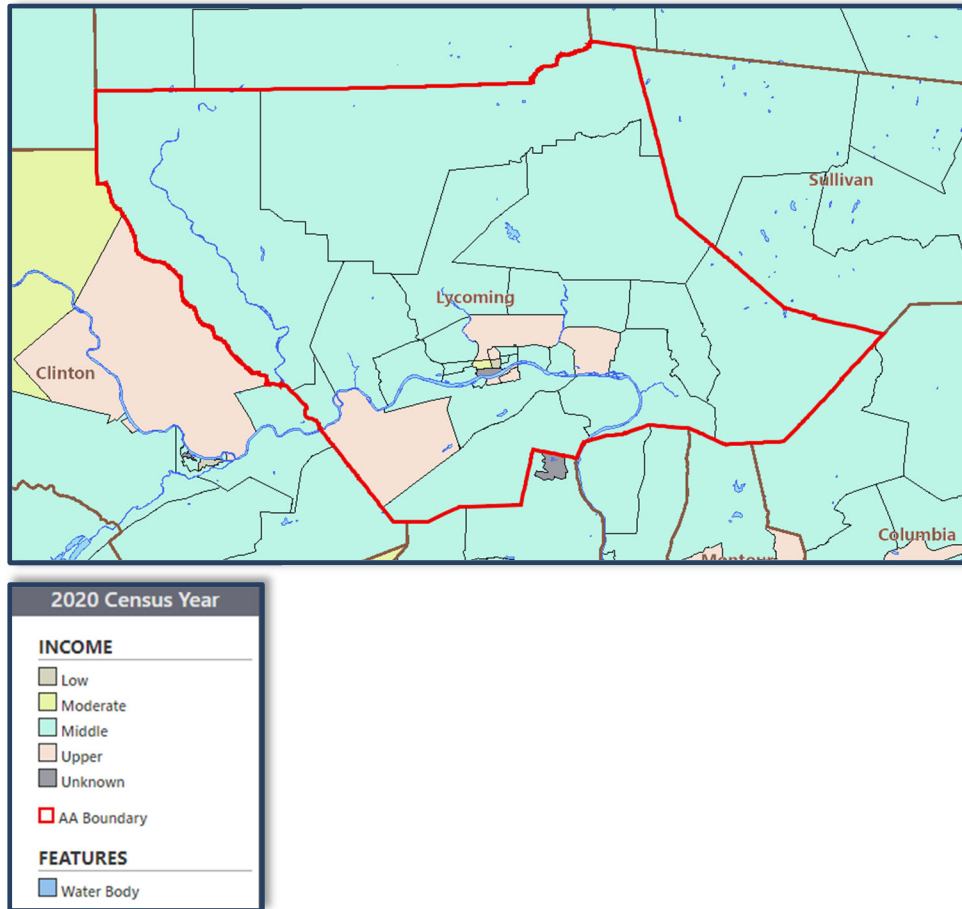
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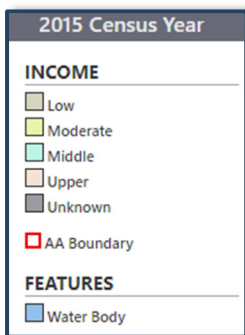
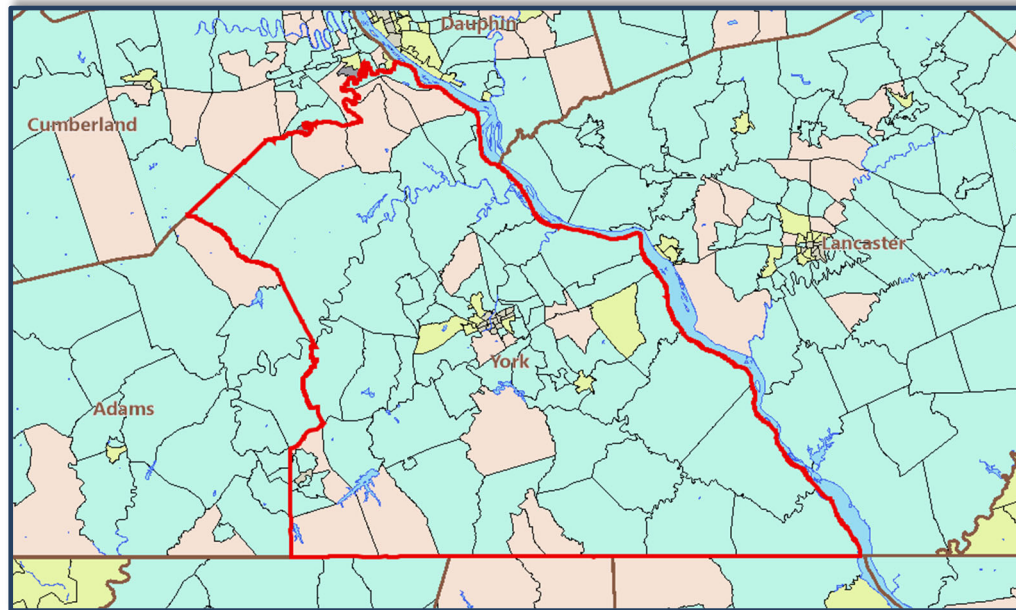
WILLIAMSPORT, PA ASSESSMENT AREA (2015 ACS DATA)



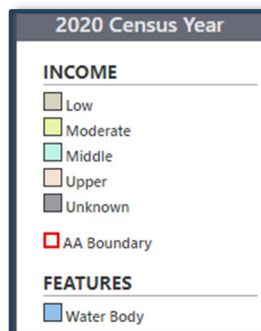
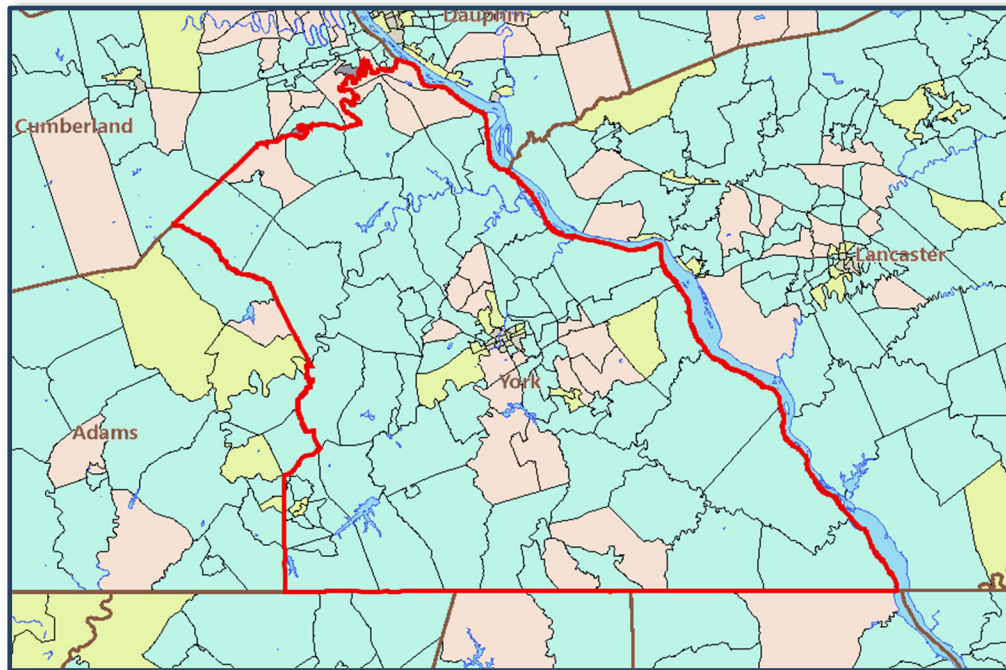
WILLIAMSPORT, PA ASSESSMENT AREA (2020 CENSUS DATA)



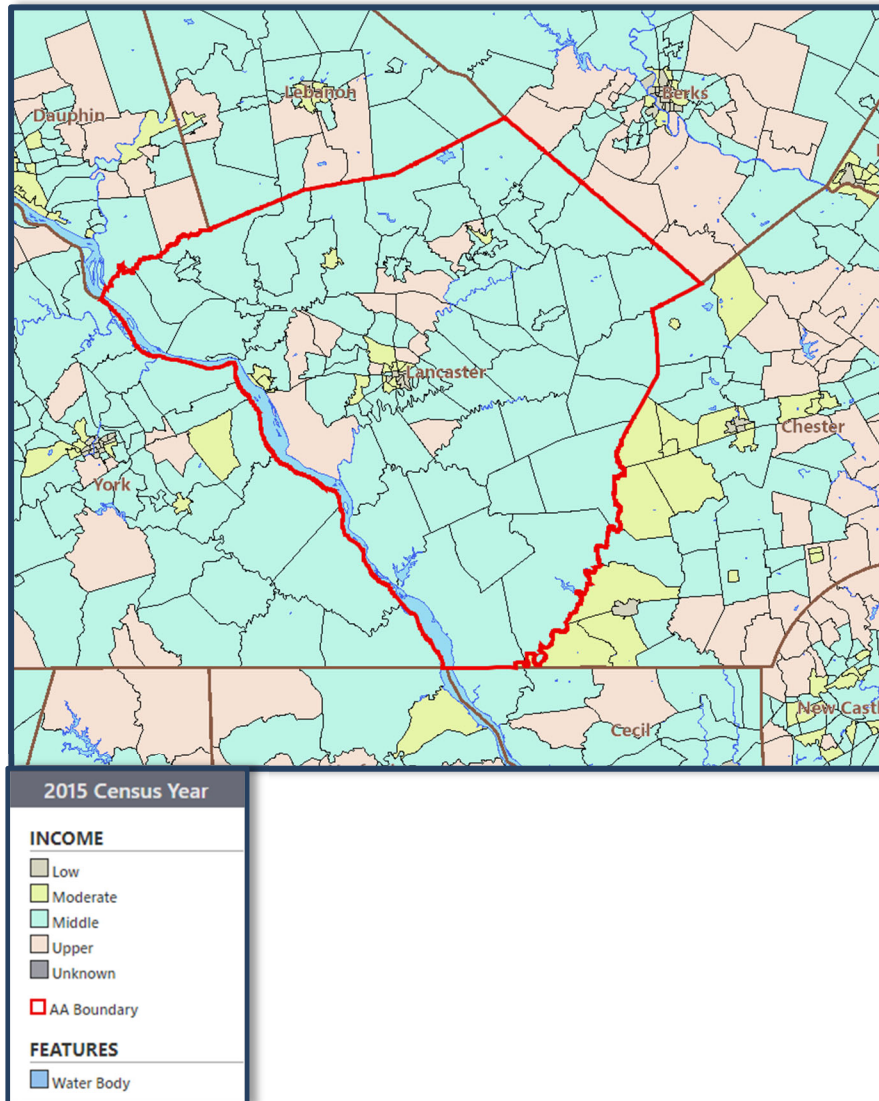
YORK, PA ASSESSMENT AREA (2015 ACS DATA)



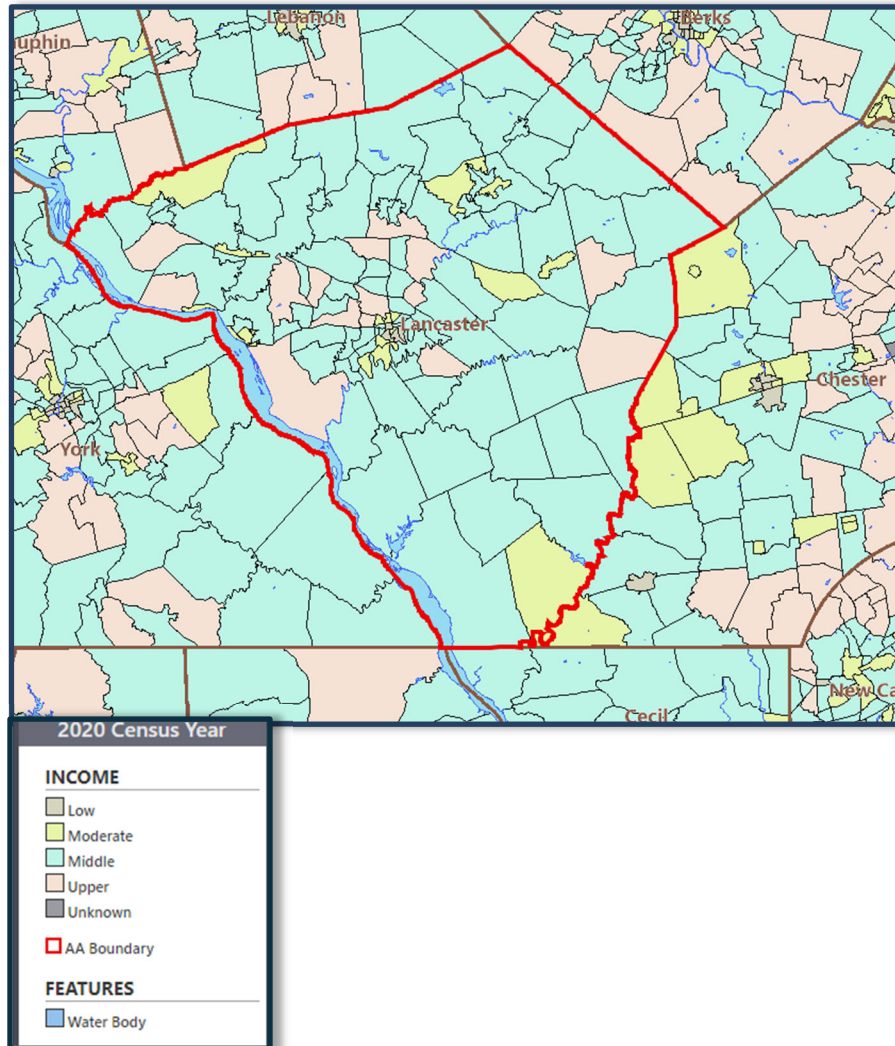
YORK, PA ASSESSMENT AREA (2020 CENSUS DATA)



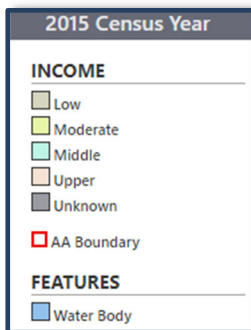
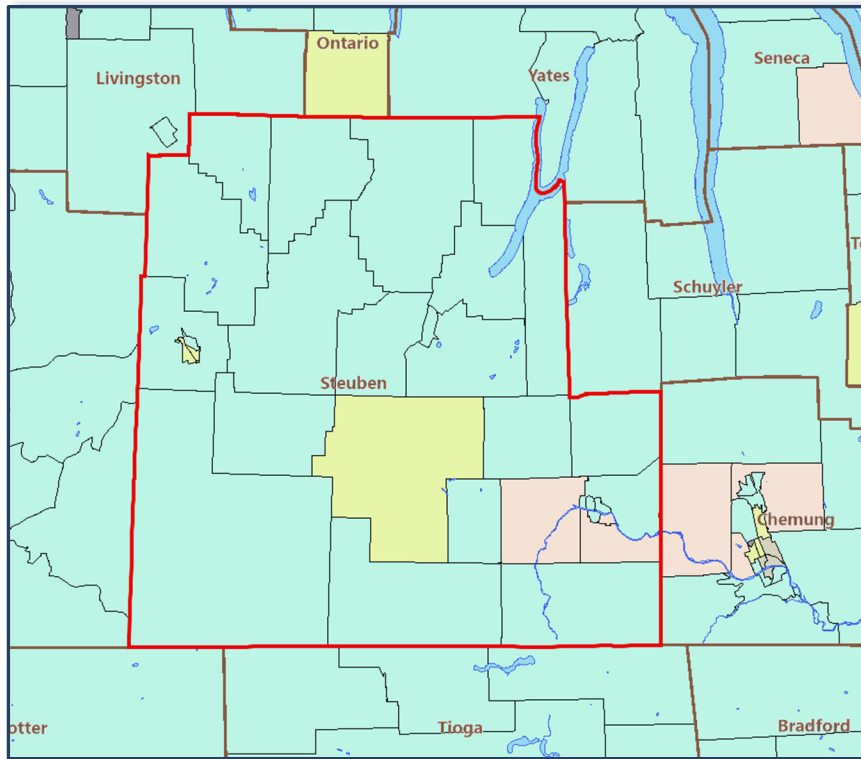
LANCASTER, PA ASSESSMENT AREA (2015 ACS DATA)



LANCASTER, PA ASSESSMENT AREA (2020 CENSUS DATA)



NY NON-MSA ASSESSMENT AREA (2015 ACS DATA)



NY NON-MSA ASSESSMENT AREA (2020 CENSUS DATA)

