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Federal Housing Finance Agency Community Support Statement

FHFA Form 060
OMB Number 2590-0005
Expires 04/30/2026

FHFA Federal Home Loan Bank (FHLBank) Member ID Number: 14005

Name of FHLBank Member Institution: The Upstate National Bank

Mailing Address: 729 Proctor Avenue

City: Ogdensburg

Submitter Name: Laura Anderson

Work Email: LANDERSON@UPSTATEBANK.COM

State: NY

Title: SVP, Regulatory Compliance

Zip Code: 13669

The information in the Community Support Statement (CSS) submitted by the member, as reflected in this document, may be updated, or changed upon FHFA's review of the CSS.

Part I. Community Reinvestment Act (CRA) Standard:

Most recent CRA rating: Satisfactory

Year of most recent CRA rating: 2021

Part II. First-time Homebuyer Standard: All Federal Home Loan Bank members must complete either Section A or B of this part, except that members with "Outstanding" federal CRA ratings need not complete this part. Members should use data or activities for the previous or current calendar year in completing this part.

A. Complete the following two questions: If your institution did not make, or did not track, mortgage loans to first-time homebuyers, you must complete Section B of this part.

- 1. Number of mortgage loans made to first-time homebuyers 0
- 2. Dollar amount of mortgage loans made to first-time homebuyers \$0

B. Check as many as applicable:

- 1. Offer in-house first-time homebuyer program (e.g., underwriting, marketing plans, outreach programs) No
- 2. Other in-house lending products that serve first-time homebuyers or low- and moderate-income homebuyers No
- 3. Offer flexible underwriting standards for first-time homebuyers No
- 4. Participate in nationwide first-time homebuyer programs (e.g., Fannie Mae, Freddie Mac) No
- 5. Participate in federal government programs that serve first-time homebuyers (e.g., FHA, VA, USDA RD) No
- 6. Participate in state or local government programs targeted to first-time homebuyers (e.g., mortgage revenue bond financing) No
- 7. Provide financial support or technical assistance to community organizations that assist first-time homebuyers No
- 8. Participate in loan consortia that make loans to first-time homebuyers No
- 9. Participate in or support special counseling or homeownership education targeted to first-time homebuyers No
- 10. Hold investments or make loans that support first-time homebuyer programs No
- 11. Hold mortgage-backed securities that may include a pool of loans to low- and moderate-income homebuyers No
- 12. Use affiliated lenders, credit union service organizations, or other correspondent, brokerage or referral arrangements with specific unaffiliated lenders, that provide mortgage loans to first-time or low- and moderate-income homebuyers Yes
- 13. Participate in the Affordable Housing Program or other targeted community investment/development programs offered by the Federal Home Loan Bank No
- 14. Other (attach description of other activities supporting first-time homebuyers; see instructions for Part II) No
- 15. None of the above (attach explanation of any mitigating factors; see instructions for Part II) No

If you checked Question 14 or 15, please explain below. If your explanation will exceed 300 characters, please upload a file containing your explanation and supporting documents:

Supporting documents:

Upstate Bank - Community Support Statement August 2025.pdf

Part III. Certification:

By submitting this Community Support Statement, I certify that I am a senior official of the above institution, that I am authorized to provide this information to FHFA, and that the information in this Statement and any attachments is accurate to the best of my knowledge.

Paperwork Reduction Act Statement: Notwithstanding any other provision of the law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act, unless that collection of information displays a currently valid OMB Control Number.

Community Support Program Review

Community Support Program CommunitySupportProgram@fhlbny.com

09/03/2025

The Upstate National Bank

Member is in compliance The Federal Housing Finance Agency (FHFA) has reviewed the Community Support Statement that your institution submitted on **8/26/2025 11:14:11 AM**. FHFA has determined that your institution is in compliance with the requirements of FHFA's Community Support Requirements regulation (12 CFR part 1290), effective **8/29/2025**.

Please direct all questions to CommunitySupportProgram@fhlbny.com.



Comptroller of the Currency
Administrator of National Banks



OCC Secure Mail

CRA Public Notice Requirement

kwhelehan@upstatebank.com

CRA Public Notice Requirement

Received: Oct 8, 2020 3:44 PM
Expires: Dec 7, 2020 4:44 PM
From: occsyr@occ.treas.gov
To: kwhelehan@upstatebank.com, tbeers@maplecitiesavings.com, sgobel@grotonbank.com, bdumond@geddesfederal.com, jwatt@nbtbank.com, fnbdryden@aol.com, scacchio@champlainbank.com, jvitale@senecasavings.com, tmurphy@arrowbank.com, tganey@savannahbankny.com, menzo.case@mygenbank.com, cbrooks@drydenbank.com, paul.ward@communitybankna.com, mshattuck@drydenbank.com, fhamlin@cnbank.com, chris.dowd@bsnb.com, rschick@bankwithlnb.com, ddemarco@arrowbank.com, kwilmshurst@massenasavingsloan.com, citbank@cit-tele.com, kwade@cayugalakenationalbank.com, pete@dnbd.net, mark.tryniski@communitybankna.com, tpiche@carthagesavings.com, jhbuhrmaster@firstscotia.com, dnasca@evansbank.com, tkime@bankwithlnb.com
Cc: jesse.anderson@occ.treas.gov, charles.shafer@occ.treas.gov, mquick@savannahbankny.com, shelley.tafel@mygenbank.com, mcondon@nbtbank.com, lori.parish@mygenbank.com, kgilbert@grotonbank.com, astewart@arrowbank.com, mbaumgarden@evansbank.com, nancy.pierce@bsnb.com, kathryn@dnbd.net, leanna.fischer@occ.treas.gov, dwright@cnbank.com, lmirabito@nbtbank.com, leddy@arrowbank.com, cmonty@champlainbank.com
Subject: CRA Public Notice Requirement

This message was sent securely using Zix

Good afternoon. I am sending this email on the behalf of ADC Jesse Anderson.

In June 2020, the OCC published a final rule to strengthen and modernize the Community Reinvestment Act. The June 2020 CRA rule established a new requirement that a bank must include an email address for its Deputy Comptroller in its CRA Public Notice. The OCC has established a centralized email box, CRACOMMENTS@OCC.TREAS.GOV, for banks to use as the required email address. Please use this address as the email address for your Deputy Comptroller in your CRA Public Notice. Thank you. If you have any questions, please reach out to me at (315) 728-7000.



Community Reinvestment Act Notice – Main Office

Under the Federal Community Reinvestment Act (CRA), the Office of the Comptroller of the Currency (OCC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The OCC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the OCC and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each calendar quarter, the OCC publishes a list of the banks that are scheduled for CRA examination by the OCC for the next two quarters. This list is available through the OCC's website at OCC.gov

You may send written comments about our performance in helping to meet community credit needs to Corporate and Professional Banking Center, located at 150 State Street, Suite 320, Rochester, NY 14614, Laura Anderson, SVP, Regulatory Compliance, to the OCC Deputy Comptroller, Northeastern Region Office of the Comptroller of the Currency, 7 Times Square, 10th Floor, New York, NY 10036.

You may also submit comments electronically to the OCC at CRAComments@occ.treas.gov. Your written comments, together with any response by us, will be considered by the OCC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the OCC. You may also request from the OCC an announcement of our applications covered by the CRA filed with the OCC.



CRA Initiatives – Updated Annually as of December 31, 2024

Executive Summary

In 2024, Upstate National Bank focused on stabilizing operations, strengthening community impact, and maintaining sound banking practices amid ongoing economic challenges in the North Country. Key priorities included improving financial performance, supporting sustainable growth, and enhancing customer access to banking services.

Key Financial Highlights

As of December 24, 2024, weekly statement, the Bank reported total deposits of \$170 million, of which \$17 million are held in Philadelphia accounts and \$11 million in Ogdensburg. Total loans within the North Country portfolio stand at \$92 thousand.

Management Overview

When the new management team joined Upstate National Bank in 2024, the Bank faced annual losses of approximately \$1 million and was operating under an OCC Order. The immediate priorities were to:

1. Turn the Bank's performance around
2. Avoid entering high-risk business lines

Commercial lending remained the Bank's primary focus, while maintaining deposits that did not require additional system or personnel support remained a key objective.

Branch Strategy and Community Commitment

Since the Bank's founding in Lisbon, management initially retained the three existing offices despite economic challenges in the North Country. Eventually, accounts from Lisbon were consolidated into the Ogdensburg Office, with courier services offered to Lisbon municipal account holders. The Lisbon branch property was later donated to a local nonprofit.

Economic Conditions in the North Country

The North Country continues to face economic pressures, relying heavily on Fort Drum and several correctional facilities. Ongoing uncertainty regarding the stability of these major employers impacts the area's long-term financial outlook. Upstate remains committed to supporting the region safely and sustainably.

Residential Mortgages and Consumer Lending

Upstate does not originate residential mortgages but purchases them through 1st Priority, providing preferential rates for North Country applicants. The Bank also maintains a modest consumer loan portfolio and sets competitive rates aligned with the local market.

Community Contributions

Due to its modest size, Upstate makes limited charitable contributions. Of the total contributions of \$4,995 in 2024, \$425 supported Ogdensburg nonprofits and \$200 supported Philadelphia nonprofits, representing 13% of total giving.

Additionally, Upstate has enhanced community vitality by selecting Watertown Savings as a preferred participant.



Conclusion

Upstate National Bank remains committed to responsible growth, community support, and sound banking practices. Through strategic lending, competitive deposit offerings, and community partnerships, the Bank continues to support the North Country's long-term stability.



PUBLIC DISCLOSURE

December 6, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Upstate National Bank
Charter Number 12018

729 Proctor Avenue
Ogdensburg, New York 13669

Office of the Comptroller of the Currency

5000 Brittonfield Parkway
Suite 102B
East Syracuse, New York 13057

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on performance in the state of New York (NY), which demonstrated an overall reasonable distribution of loans to geographies of different income levels and an overall reasonable distribution of loans to borrowers of different income levels.
- The Upstate National Bank (UNB or bank) had a more than reasonable loan-to-deposit ratio during the evaluation period.
- The bank originated and purchased a majority of loans outside the assessment area (AA) during the evaluation period.

Loan-to-Deposit Ratio

UNB's average loan-to-deposit ratio during the evaluation period was more than reasonable. The bank's average quarterly loan-to-deposit ratio during the evaluation period, January 1, 2018 through December 31, 2020, was 109.4 percent. In comparison, four similarly situated institutions had average quarterly loan-to-deposit ratios ranging from 51.0 percent to 124.9 percent during the same period.

Lending in Assessment Area

A majority of the bank's loans were outside its AAs.

The bank originated and purchased 51.4 percent of its total loans outside the bank's AAs during the evaluation period. The bank originated and purchased 44.8 percent of its home mortgage loans and 57.9 percent of its small loans to businesses from inside the bank's AAs during the evaluation period.

This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	103	44.8	127	55.2	230	38,239	47.1	42,872	52.9	81,111
Small Business	55	57.9	40	42.1	95	14,046	56.9	10,624	43.1	24,670
Total	158	48.6	167	51.4	325	52,285	49.4	53,496	50.1	105,781

Description of Institution

UNB is a \$205 million, single state, community bank headquartered in Ogdensburg, NY. While chartered in Ogdensburg, all administrative and operational activity is handled in Rochester, NY. UNB is majority owned by George Karfunkel. The bank operates three full-service branches; one is located in the city of Rochester, NY, which is part of the Rochester, NY metropolitan statistical area (MSA), one is located in the town of Philadelphia, NY, which is part of the Watertown-Fort Drum, NY MSA, and one is located in the town of Ogdensburg, NY, which is part of the non-MSA portion of New York State.

The bank has one automated teller machine (ATM), which is non-deposit taking and located at the Rochester branch. The ATM can only be utilized during the building's hours of operation (7:00 a.m. to 7:00 p.m.). Banking hours are 9:00 a.m. to 4:00 p.m. at each branch location. However, the teller window at the Rochester branch is only open from 10:00 a.m. to 2:00 p.m. The Ogdensburg branch is the only location with a drive-thru window, which opens 45 minutes prior to the branch. Since the prior CRA evaluation, there were no branch openings or closings, and the bank was not a part of a merger or acquisition.

UNB offers traditional products and services, with a primary focus on commercial banking products. Banking products advertised on the bank's website consist solely of commercial products and include commercial and industrial loans, lines of credit, term loans, revolving line facilities, commercial real estate (investor) mortgages, commercial real estate (owner-occupied) mortgages, and short-term and bridge financing. The bank will originate personal loans at a customer's request; however, the bank does not advertise consumer products on their website or in branch locations. UNB is not licensed to originate residential mortgage loans; therefore, all one-to four- family residential mortgage loans on the balance sheet are loans purchased or originated as commercial real estate loans to investors. All lending officers are located at the Rochester branch. Consumer loan applications are accepted at all branches and are sent to the Rochester branch for underwriting and approval. Commercial loan applications are only accepted at the Rochester branch. UNB offers online banking services for retail customers. The service allows customers to view deposit account balances and transfer balances between UNB accounts, and the service includes a bill pay feature.

UNB sources deposits from its three AAs. As of December 31, 2020, UNB's deposit base totaled \$194.8 million. The Federal Deposit Insurance Corporation (FDIC) market share reports indicated the majority of the bank's deposits, as of June 30, 2020, were derived from the Rochester, NY MSA, which accounted for 86.9 percent of total deposits. The Watertown-Fort Drum, NY MSA and St. Lawrence County non-MSA AAs contributed 9.2 percent and 3.9 percent of the deposit base, respectively.

As of December 31, 2020, gross loans equaled \$176.9 million or 86.5 percent of total assets. Management continued strategic focus on commercial loan growth, primarily commercial real estate, as evidenced by the bank's significant concentration in commercial real estate loans at 512.8 percent of total capital, as of December 31, 2020. The loan mix was consistent with management's business strategy and consists of the following: \$92.9 million (52.5 percent) commercial real estate, \$73.5 million (41.5 percent) residential real estate, \$10.0 million (5.7 percent) commercial and industrial, and \$469 thousand (0.3 percent) in other loans. Loans classified as residential real estate on the call report were either commercial loans secured by one-to four-family real estate or purchased one-to four-family mortgage loans.

UNB has no legal, financial, or other impediments that would hinder its ability to help meet the credit needs in its AA. UNB's last CRA evaluation was dated October 1, 2018, at which time the bank's performance was rated "Needs to Improve".

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's performance was assessed using home mortgage loans and small loans to businesses originated and purchased during the evaluation period. The evaluation period covered a three-year period from January 1, 2018 through December 31, 2020. The OCC's assessment of small loans to businesses was based on a sample of 95 loan originations, and the assessment of mortgage loans was based on a sample of 29 loans originated during the evaluation period.

Lending performance was assessed based on the bank's primary loan products. Primary loan products, for purposes of this review, were products in which the bank originated at least 20 loans within an AA during the evaluation period. UNB had a sufficient volume of home mortgage loans and small loans to businesses in the Rochester, NY MSA AA to conduct a meaningful analysis. The bank did not originate or purchase a sufficient volume of loans to conduct a meaningful analysis in the Watertown-Fort Drum, NY MSA or St. Lawrence County non-MSA AAs.

Selection of Areas for Full-Scope Review

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

Ratings

In determining overall conclusions for UNB, the rating was based upon the bank's performance in its only Rating Area, the state of New York.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of New York

CRA rating for the State of New York¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is reasonable.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- UNB did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in New York

As of December 31, 2020, UNB had three AAs within the state of New York. These AAs included the Rochester, NY MSA AA, the Watertown-Fort Drum, NY MSA AA, and the St. Lawrence County non-MSA AA. Refer to Appendix A for the geographies that make up the AAs. All state of New York AAs met the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income tracts.

UNB offers traditional products and services through its three branches and one non-deposit taking ATM, with a primary focus on commercial banking products. Banking products advertised on the bank's website consist solely of commercial products and include commercial and industrial loans, lines of credit, term loans, revolving line facilities, commercial real estate (investor) mortgages, commercial real estate (owner-occupied) mortgages, and short-term and bridge financing. UNB is not licensed to originate residential products; therefore, all home mortgage loans used in the analysis of the bank's performance under the Lending Test consist of purchased residential mortgages or were originated as commercial loans to investors. Consumer loans are originated; however, lending volume is limited.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Rochester, NY MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: UNB Rochester NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	193	22.8	15.0	32.1	27.5	2.6
Population by Geography	749,356	13.0	13.5	37.6	35.2	0.8
Housing Units by Geography	323,313	13.9	14.3	38.6	33.1	0.1
Owner-Occupied Units by Geography	192,326	5.1	10.4	42.4	42.1	0.0
Occupied Rental Units by Geography	107,438	25.9	20.4	33.3	20.3	0.2
Vacant Units by Geography	23,549	31.6	18.8	31.3	18.3	0.1
Businesses by Geography	53,029	12.5	11.2	36.9	39.2	0.3
Farms by Geography	1,127	4.2	7.4	43.9	44.5	0.1
Family Distribution by Income Level	182,181	22.0	16.3	19.3	42.3	0.0
Household Distribution by Income Level	299,764	25.0	15.7	16.9	42.4	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$67,757	Median Housing Value			\$132,345
			Median Gross Rent			\$827
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Rochester, NY MSA AA consisted of all census tracts within Monroe County, which included the City of Rochester. Per the 2015 American Community Survey (ACS) data, the Rochester, NY MSA AA included 44 low-income tracts, 29 moderate-income tracts, 62 middle-income tracts, 53 upper-income tracts and five tracts for which income had not been designated. The bank's Rochester, NY MSA AA complied with the CRA regulation and did not arbitrarily exclude low- and moderate-income geographies.

UNB offered their full range of products and services through one branch and one non-deposit-taking ATM located in the Rochester, NY MSA AA. According to the June 30, 2020 FDIC Market Share Report, UNB had \$123.0 million in deposits in the Rochester, NY MSA AA, which accounted for 86.9 percent of UNB's bank-wide deposits. UNB ranked 14th out of 18 deposit taking institutions in the MSA with a 0.6 percent market share of deposits. The deposit market in the Rochester, NY MSA AA was dominated by four national and regional banks, whose combined deposit market share was 61.5 percent. These banks included Manufacturers and Traders Trust Co., Key Bank. N.A., JPMorgan Chase and Canandaigua National Bank and Trust Company. Other banks in the Rochester, NY MSA AA included Citizens Bank, Bank of America, and Five Star Bank, with market shares of 8.0, 6.7, and 6.0 percent, respectively.

Home mortgage loans and small loans to businesses represented the primary products for CRA evaluation purposes. Home mortgage loan originations and purchases in the Rochester, NY MSA AA accounted for 94.2 percent of all home mortgage loans originated inside the bank's AAs. Small loans to

businesses in the Rochester, NY MSA AA accounted for 96.4 percent of all small loans to businesses originated inside the bank's AAs.

There were approximately 323.3 thousand total housing units in the Rochester, NY MSA AA of which, 59.5 percent were owner-occupied; 33.2 percent were rental; and 7.5 percent were vacant units. The median housing value was \$132.3 thousand based on the 2015 ACS data.

The OCC utilized two community contacts within the Rochester, NY MSA AA. The first was obtained from an interagency listening session held in April 2021. The organizations were generally concerned with affordable and decent housing for low- and moderate-income persons and families, low- and moderate-income neighborhood revitalization and stabilization, community services for low- and moderate-income persons and families, and economic development through small business lending. The second contact emphasized that banks need to do a better job of working with minority-led organizations and historically marginalized communities, as well as developing better cultural understanding of the populations and communities they serve.

Scope of Evaluation in New York

The OCC conducted a full-scope review of the Rochester, NY MSA AA and limited-scope reviews of the Watertown-Fort Drum MSA AA and St. Lawrence County non-MSA AA. The Rochester, NY MSA AA accounted for 86.9 percent of deposits at the bank. Of loans originated or purchased in the bank's AAs, 94.2 percent of home mortgage loans and 96.4 percent of small loans to businesses were originated or purchased in the Rochester, NY MSA AA during the evaluation period. UNB did not originate or purchase a sufficient volume of loans in the Watertown-Fort Drum, NY MSA or St. Lawrence County non-MSA AAs to perform a meaningful full-scope analysis. Lending activity in the limited-scope AAs was considered in overall Lending Test conclusion. The tables in Appendix D contain lending data for full- and limited-scope AAs.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on the full-scope reviews, the bank's performance in the Rochester, NY MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the Rochester, NY MSA AA.

Home Mortgage Loans

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

Rochester, NY MSA AA

The bank's geographic distribution of home mortgage loans by income level was excellent during the evaluation period. The bank's level of home loan originations in both low-income and moderate-income

geographies exceeded the percentage of owner-occupied housing units and aggregate lending in the AA.

Small Loans to Businesses

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

Rochester, NY MSA AA

The bank's geographic distribution of small loans to businesses by income level was excellent during the evaluation period. The bank's level of small loans to businesses in both low- and moderate-income geographies exceeded the percentage of businesses in low- and moderate-income tracts and aggregate lending in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Rochester, NY MSA AA

The bank demonstrated reasonable distribution of home mortgage loans to borrowers of different incomes during the evaluation period. The percentage of home mortgage loans to low-income borrowers exceeded the percentage of low-income families and aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table R of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Rochester, NY MSA AA

The bank's distribution of small loans to businesses was reasonable during the evaluation period. The percentage of bank loans to businesses with gross annual review of \$1 million or less was below the percentage of those businesses but significantly exceeded the aggregate lending in the AA.

Responses to Complaints

UNB did not receive any CRA related complaints during the evaluation period.

Conclusions for Area Receiving a Limited-Scope Review

Bank deposit and lending activity in the Watertown-Fort Drum MSA and St. Lawrence County non-MSA AAs was not significant enough to warrant full-scope review of these AAs. While volume was

low, the bank's home mortgage performance was consistent with performance in the full-scope AA. Geographic distribution of small loans to businesses and distribution of small loans to businesses by revenue was below the full-scope AA.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2018 through 12/31/2020	
Bank Products Reviewed:	Home mortgage loans and small loans to businesses	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of New York		
Rochester, NY MSA	Full-scope	Monroe County
Watertown-Fort Drum, NY MSA	Limited-scope	Jefferson County (partial)
St. Lawrence County Non-MSA	Limited-scope	St. Lawrence County (partial)

Appendix B: Summary of MMSA and State Ratings

RATINGS	The Upstate National Bank
Overall Bank:	Lending Test Rating
UNB	Satisfactory
MMSA or State:	
New York	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-2020	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Rochester NY MSA AA	97	37,087	94.2	29,033	5.1	33.0	3.6	10.4	30.9	8.6	42.4	16.5	39.2	42.1	19.6	48.6	0.0	0.0	0.0	
St Lawrence non-MSA AA	2	150	1.9	792	0.0	0.0	0.0	12.8	100.0	16.5	65.2	0.0	62.6	22.0	0.0	20.7	0.1	0.0	0.1	
Watertown-Ft Drum NY MSA AA	4	1,002	3.9	527	0.0	0.0	0.0	0.4	75.0	0.0	99.6	25.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	103	38,239	100.0	30,352	4.6	31.1	3.5	10.4	34.0	8.7	45.2	16.5	40.8	39.8	18.4	47.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-2020		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Rochester NY MSA AA	97	37,087	94.2	29,033	22.0	69.6	6.9	16.3	13.0	18.0	19.3	13.0	22.2	42.3	4.3	39.7	0.0	0.0	13.1		
St. Lawrence non-MSA AA	2	150	1.9	792	23.1	100.0	4.5	17.4	0.0	15.5	19.8	0.0	23.6	39.7	0.0	47.9	0.0	0.0	8.5		
Watertown -Ft Drum NY MSA AA	4	1,002	3.9	527	21.4	25.0	1.1	24.0	50.0	10.8	23.9	0.0	18.2	30.7	25.0	53.7	0.0	0.0	16.1		
Total	103	38,239	100.0	30,352	22.1	65.5	6.8	16.7	17.2	17.8	19.5	13.8	22.2	41.7	3.4	40.2	0.0	0.00	13.1		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

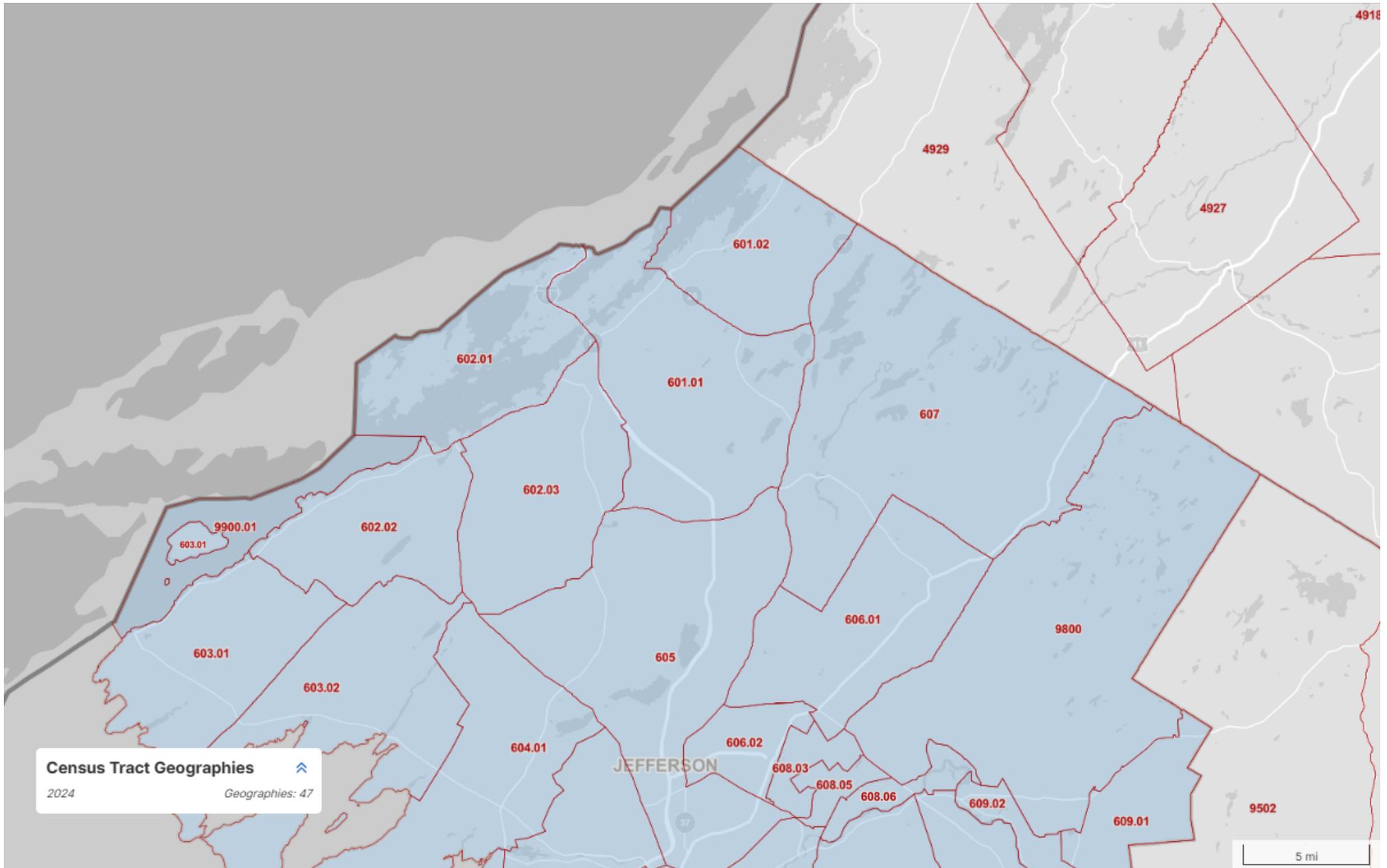
Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography (\$000)																			2018-2020
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Rochester NY MSA AA	53	13,988	97.7	13,823	12.5	37.7	10.3	11.2	15.1	10.3	36.9	20.8	36.5	39.2	26.4	42.7	0.3	0.0	0.2
St. Lawrence non-MSA AA	0	0	0.0	928	0.0	0.0	0.0	12.8	0.0	13.1	55.7	0.0	61.2	29.1	0.0	25.1	2.3	0.0	0.5
Watertown-Ft Drum NY MSA AA	2	57.5	3.6	219	0.0	0.0	0.0	4.6	0.0	0.9	95.1	100.0	99.1	0.0	0.0	0.0	0.3	0.0	0.0
Total	55	14,046	100	14,970	11.6	36.4	9.5	11.2	14.4	10.3	38.9	23.6	39.0	38.0	25.5	41.0	0.4	0.0	0.2

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-2020	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Rochester NY MSA AA	53	13,988,444	96.4	13,823	84.9	77.4	45.3	5.6	20.8	9.4	1.8	
St. Lawrence non-MSA AA	0	0	0	928	77.2	0	33.6	5.1	0	17.7	0	
Watertown-Ft Drum NY MSA AA	2	57,500	3.6	219	78.0	50.0	48.9	3.8	50.0	18.2	0	
Total	55	14,045,944	100	14,970	84.4	76.4	44.6	5.6	21.8	10.1	1.8	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Jefferson County (North) - Census Tract



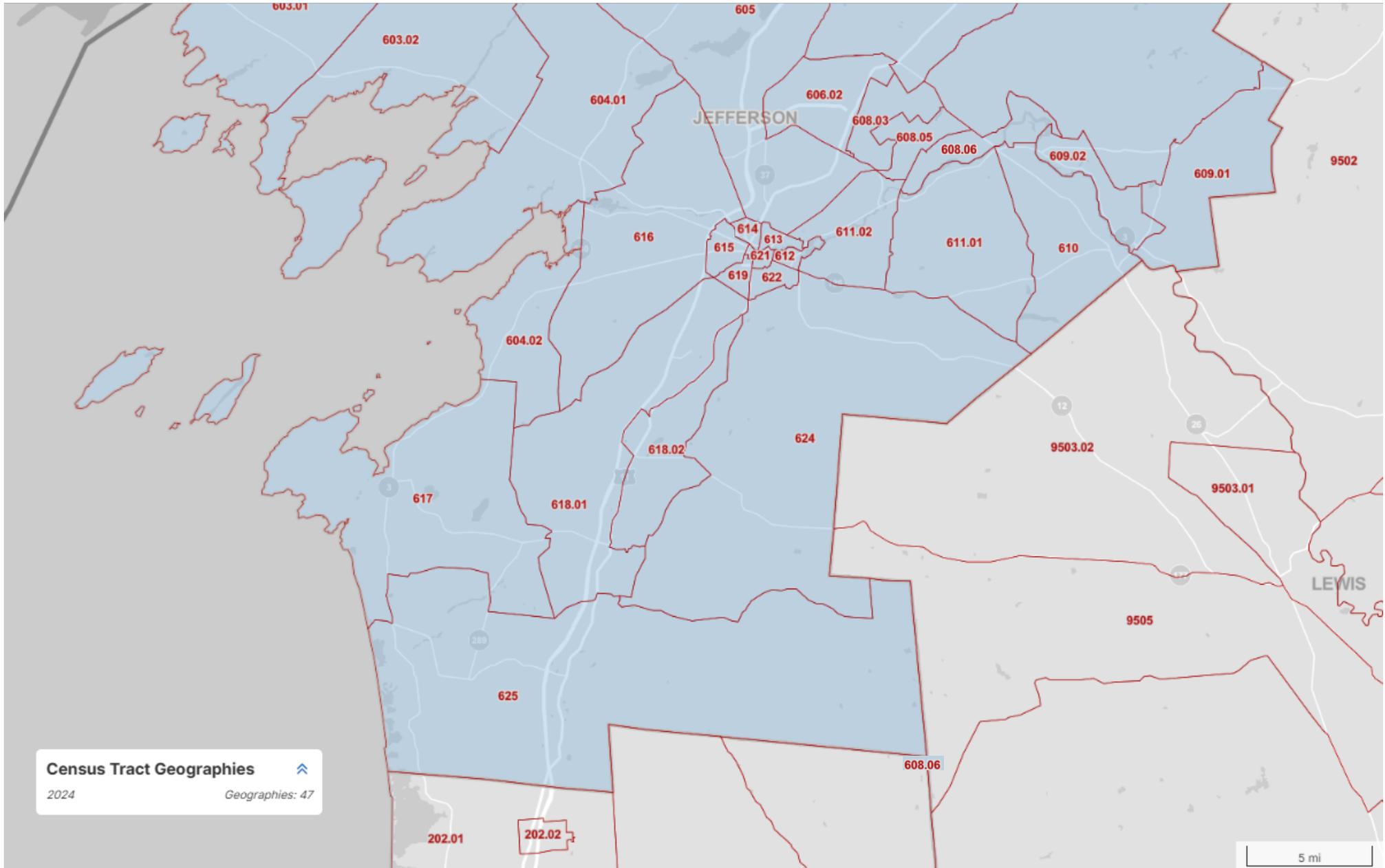
Map Note 1:

The boundaries , roads , and hydrography shown on the map are from the Census Bureau's MAF/TIGER database . Boundaries in the vicinity of coastal areas (Atlantic Ocean , Pacific Ocean , and the Great Lakes) are clipped to a representative coastline for data years 2020 and beyond and generally do not extend into the water .

Map Note 2:

The detailed basemap includes national , state , and local parks and forests from the U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2020, Protected Areas Database of the United States (PAD-US) 2.1: U.S. Geological Survey data release , <https://doi.org/10.5066/P92QM3NT> .

Jefferson County (South) - Census Tract



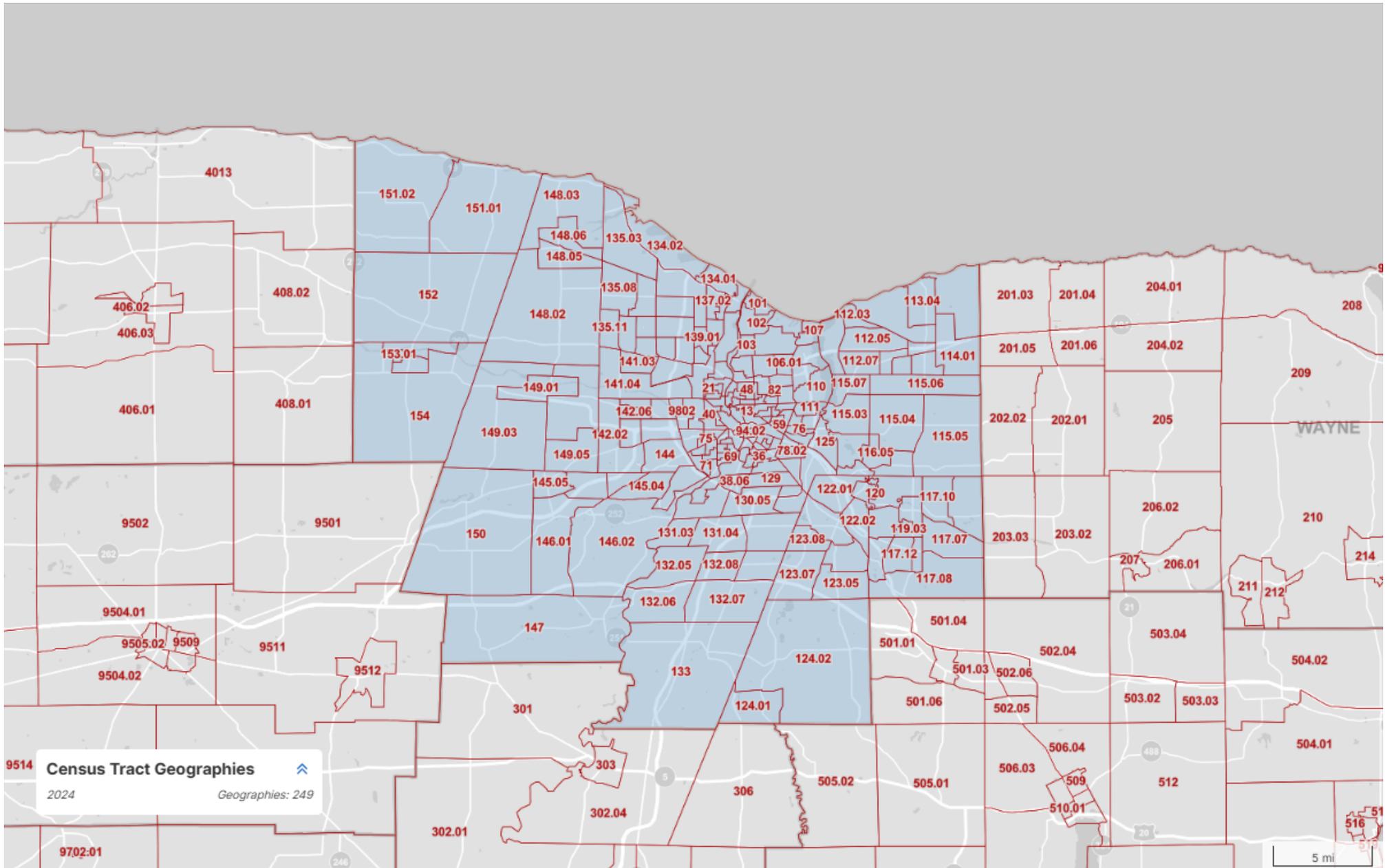
Map Note 1:

The boundaries , roads , and hydrography shown on the map are from the Census Bureau's MAF/TIGER database . Boundaries in the vicinity of coastal areas (Atlantic Ocean , Pacific Ocean , and the Great Lakes) are clipped to a representative coastline for data years 2020 and beyond and generally do not extend into the water .

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Monroe County - Census Tract



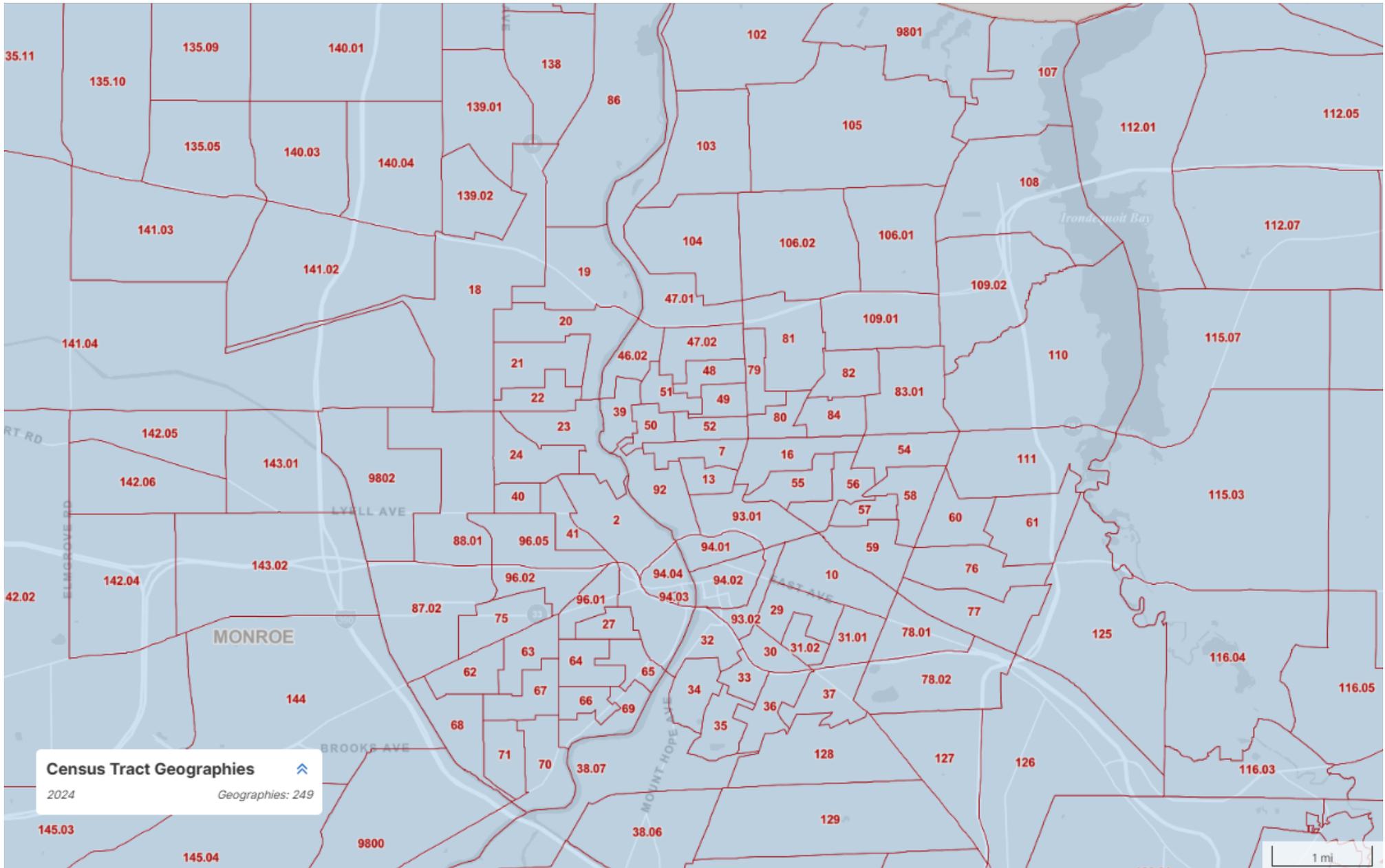
Map Note 1:

The boundaries , roads , and hydrography shown on the map are from the Census Bureau's MAF/TIGER database . Boundaries in the vicinity of coastal areas (Atlantic Ocean , Pacific Ocean , and the Great Lakes) are clipped to a representative coastline for data years 2020 and beyond and generally do not extend into the water .

Map Note 2:

The detailed basemap includes national , state , and local parks and forests from the U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2020, Protected Areas Database of the United States (PAD-US) 2.1: U.S. Geological Survey data release , <https://doi.org/10.5066/P92QM3NT> .

Monroe County - Census Tract



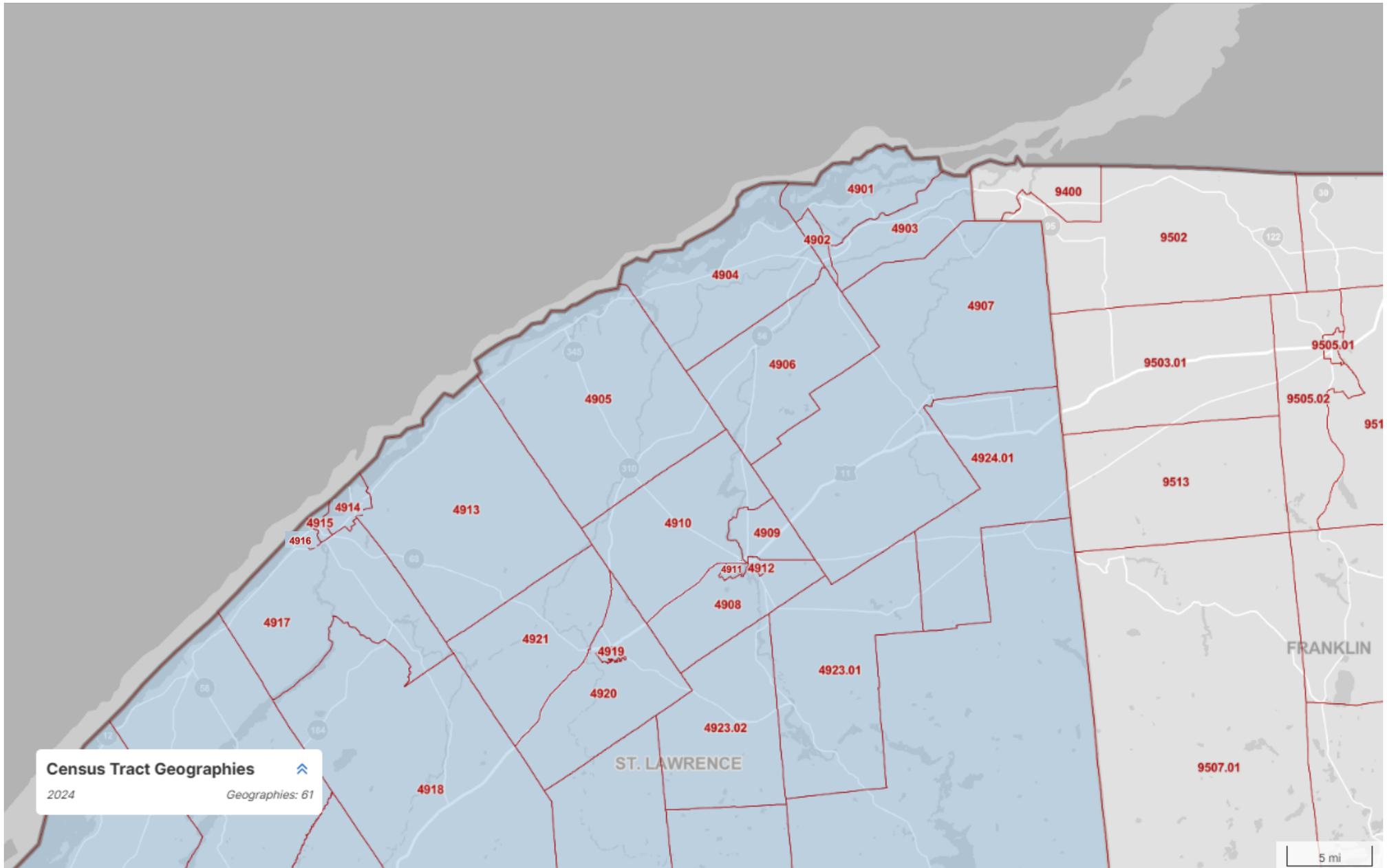
Map Note 1:

The boundaries , roads , and hydrography shown on the map are from the Census Bureau's MAF/TIGER database . Boundaries in the vicinity of coastal areas (Atlantic Ocean , Pacific Ocean , and the Great Lakes) are clipped to a representative coastline for data years 2020 and beyond and generally do not extend into the water .

Map Note 2:

The detailed basemap includes national , state , and local parks and forests from the U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2020, Protected Areas Database of the United States (PAD-US) 2.1: U.S. Geological Survey data release , <https://doi.org/10.5066/P92QM3NT> .

St. Lawrence County (North) - Census Tract



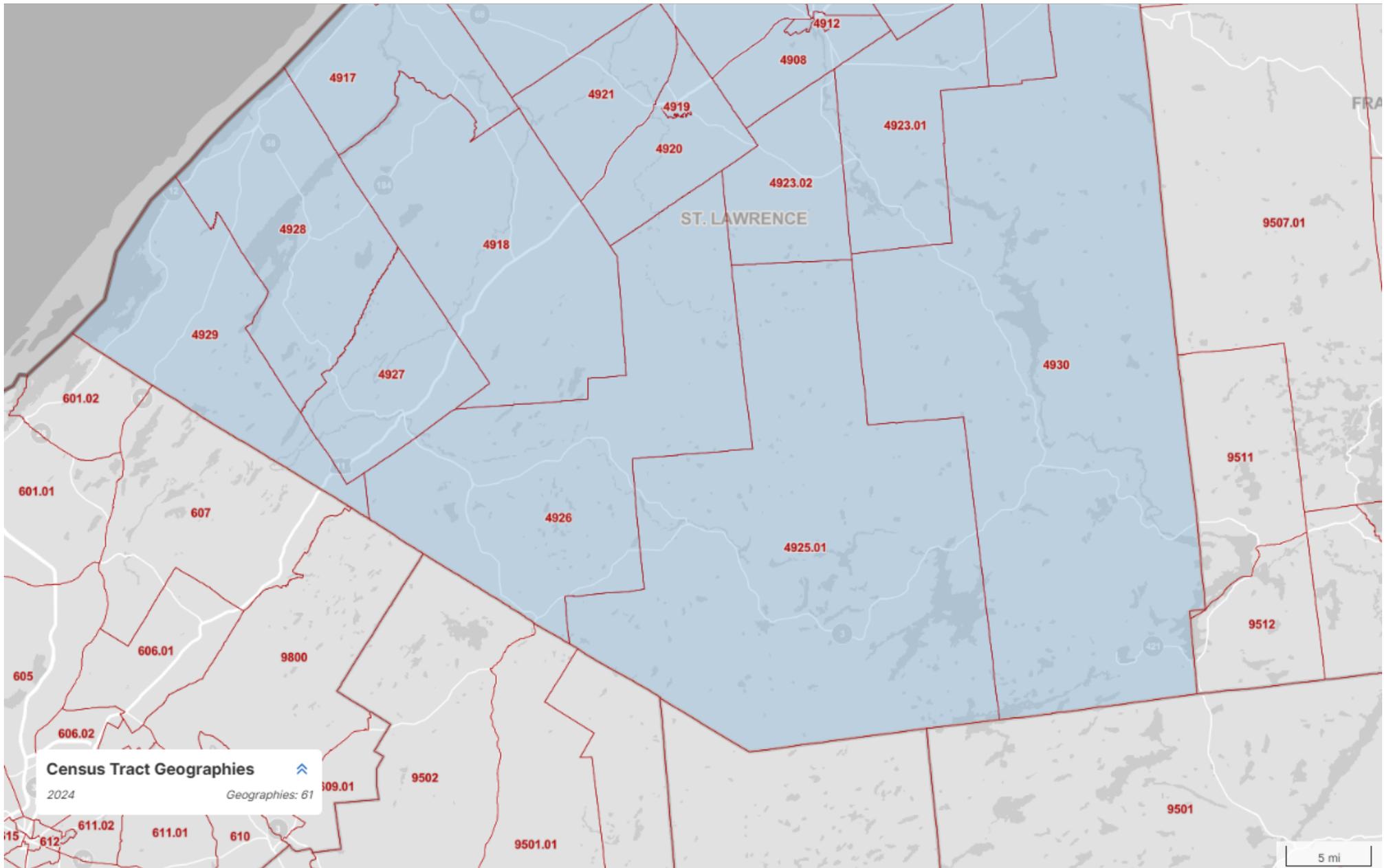
Map Note 1:

The boundaries , roads , and hydrography shown on the map are from the Census Bureau's MAF/TIGER database . Boundaries in the vicinity of coastal areas (Atlantic Ocean , Pacific Ocean , and the Great Lakes) are clipped to a representative coastline for data years 2020 and beyond and generally do not extend into the water .

Map Note 2:

The detailed basemap includes national , state , and local parks and forests from the U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2020, Protected Areas Database of the United States (PAD-US) 2.1: U.S. Geological Survey data release , <https://doi.org/10.5066/P92QM3NT> .

St. Lawrence County (South) - Census Tract



Map Note 1:

The boundaries , roads , and hydrography shown on the map are from the Census Bureau's MAF/TIGER database . Boundaries in the vicinity of coastal areas (Atlantic Ocean , Pacific Ocean , and the Great Lakes) are clipped to a representative coastline for data years 2020 and beyond and generally do not extend into the water .

Map Note 2:

The detailed basemap includes national , state , and local parks and forests from the U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2020, Protected Areas Database of the United States (PAD-US) 2.1: U.S. Geological Survey data release , <https://doi.org/10.5066/P92QM3NT> .



FULL SERVICES BANK BRANCH ADDRESSES AND HOURS OF OPERATION

Monroe County

Rochester Corporate and Professional Banking Center
150 State Street, Suite 320
Rochester, NY 14614

585-454-3450 800-543-9064 (toll free) 585-454-3624 (fax)

Office Hours: Mon – Fri 9 AM – 4 PM
Lobby Hours: Mon – Fri 10 AM – 2 PM

MSA Code: 40380
State Code: 36
County Code: 055
Tract Code: 0094.0
MSA-State-County-Tract: 40380-36-055-0094.04

St Lawrence County:

Ogdensburg Branch Office
729 Proctor Avenue
Ogdensburg, NY 13669

315-393-3332 800-219-6109 (toll free) 315-393-6193 (fax)

Lobby Hours: Mon – Fri 9 AM – 4 PM
Drive-Up Hours: Mon – Fri 8:15 AM – 4 PM

MSA Code: N/A
State Code: 36
County Code: 089
Tract Code: 4914.00
MSA-State-County-Tract: NA-36-089-4914.00

Jefferson County

Philadelphia Branch Office
77 Main Street
Philadelphia, NY 13673

315-642-3422 315-642-3425 (fax)

Lobby Hours: Mon – Fri 9 AM – 4 PM

MSA Code: 48060
State Code: 36
County Code: 045

Tract Code: 0606.0
MSA-State-County-Tract: 40380-36-045-0606.01



Tab 4 – List of Bank’s Branches Opened or Closed in the Current Year or
The Previous Two Years - None



Tab 5 Previous Two Years of HMDA Disclosures Statements

The Bank did not originate at least 100 closed-end mortgage loans in each of the two preceding calendar years or originate at least 200 open-end lines of credit in each of the two preceding calendar years and is therefore not required to submit HMDA data.



Quarterly Loan-To-Deposit Ratio – Previous Two Calendar Years

Quarter:	Ratio:
3/31/25	126.69
12/31/24	129.00
9/30/24	119.54
6/30/24	126.28
3/31/24	119.03
12/31/23	126.30
9/30/23	127.22
6/30/23	124.35
3/31/23	108.25



Tab 7 Quarterly Report Documenting Efforts to Improve CRA Performance (if required)

Not required



FEE SCHEDULE

Checking Account Fees

Check Printing.....	Varies by style
Insufficient Funds (NSF) per check	
EFT/ACH Recurring Withdrawal.....	\$30.00
Return Item.....	\$10.00
Stop Payment.....	\$25.00

General Account Fees

Account Reconciliation per hour (1-hour minimum)	\$20.00
Copies Deposits/Checks.....	\$0.10
Dormant Account (Checking and Savings 545 days)	\$5.00
Copy/Duplicate/Interim Statement.....	\$10.00
Legal Processing (e.g. IRS Levies)	\$75.00
Check Protest Other Bank Check.....	\$20.00
Research per hour (1-hour minimum)	\$25.00
Wire-Outgoing.....	\$25.00

Safe Deposit Fees

Safe Deposit Box Rental Fee:	Varies by Size
Key Replacement.....	\$25.00
Drilled Box.....	\$100.00

Miscellaneous Fees

Cashier's Check	\$5.00
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Retail Banking Services

Deposit Products:

- Regular Checking
- Regular Savings
- Business Checking
- Business Manager Savings
- NOW Accounts
- Money Market Deposit Accounts
- Christmas Club Savings Account (*Ogdensburg and Philadelphia branches*)
- Basic Banking Checking Accounts
- Certificates of Deposit (CD's)
- Individual Retirement Accounts (IRA's)

Consumer Credit Products

- Regular Savings and Certificate of Deposit Secured Loans
- Overdraft Lines of Credit
- Personal Revolving Lines of Credit
- Personal Installment Loans (secured and unsecured)
- Home Equity Lines of Credit

Convenience Products:

- Official Bank Checks
- Automated Clearing House Services
- Wire Transfers (Domestic & International)
- Bank by Mail
- Night Depository
- Direct Deposit
- Auto Deduct for UNB Loan Payments
- ATM/Debit Cards
- On-Line Banking
- On-Line Bill Pay
- Safe Deposit Boxes (*Ogdensburg and Philadelphia branches*)
- Remote Deposit Capture



Mobile Deposit

Check Positive Pay

IntraFi (Large Balance Insurance)

Sweeps (one-way, two-way, ZBA)



COMMERCIAL BANKING SERVICES

Real Estate Loans

1. Permanent Loans
2. Construction Loans/ Bridge Loans
3. Subdivision Development Loans
4. Real Estate Line of Credit

Business Lines of Credit

1. Lines of Credit on Demand Basis
2. Lines of Credit with maturity dates (including Revolving & Non-Revolving)
3. Formula-Based Lines of Credit

Term Loan

Demand Loans

SBA Financing

Standby Letters of Credit

Time Notes

Bond Anticipation for Municipalities

Consumer Credit Services

1. Certificate of Deposit Secured Loans
2. Overdraft Lines of Credit
3. Personal Revolving Lines of Credit
4. Personal Installment Loans (secured and unsecured)



Tab 9 - Public Comments and Bank Responses
(Current year and previous two years)



Notice of complaint acknowledgement

Customer Name
Address
Account Number
Date

Dear Mr/Ms. Jones,

We received your direct complaint dated _____ and will conduct a thorough and **reasonable investigation** of our files and records based on the information submitted. We will follow up within 60 days or less, excluding legal holidays, Saturdays and Sundays.

If any corrections are to be made to the account in question, a written explanation or clarification of the results of our investigation/correction, and any action(s) taken, will be given back in a response.

Accordingly, we are not authorizing any adjustments to your account at this time and are sending you this letter within 20 days of receiving your complaint. We encourage you to go online to view your **"Summary of Rights"**.

Sincerely,

Laura Anderson
SVP, Regulatory Compliance Officer and CRA Officer

Investment	Recipient Organization	Investment Amount	Investment Date	Description	Purpose	Number of a) affordable housing units, b) families assisted, c) businesses assisted	Branch
	Antwerp Food Pantry	500.00	12/16/2025				
	Indian River Baptist Church Food Pantry	500.00	12/16/2025				
	Theresa Youth Comission	500.00	12/16/2025				
	STEP BY STEP INC	500.00	11/24/2025	CC 61242			Ogdensburg - Denise
	CHMC AUXILIARY	100.00	9/24/2025	CC 61084 - FESTIVAL OF THE TREES			Chris/Michelle
	COMMUNITY HEALTH CENTER OF THE NORTH COUNTRY	50.00	8/26/2025	CC61002			Chris/Michelle
	OGDENSBURG SNACKPACK PROGRAM	50.00	8/26/2025	CC61003			Chris/Michelle
	LISBON CHEERLEADING	50.00	8/26/2025	CC61004			Chris/Michelle
	HOSPICE OF ST. LAWRENCE VALLEY	100.00	7/24/2025	CC60924 - 15TH ANNUAL SWIM A MILE FOR HOSPICE			Chris/Michelle
	THE FIRST PRESBYTERIAN CHURCH	50.00	7/9/2025	5TH AMAZING RACE AROUND OGDENSBURG			Ogdensburg - Denise
	GOUVERNEUR BREAST CANCER FUND	200.00	6/12/2025	24TH ANNUAL CANCER FUND WALK			Ogdensburg - Denise
	THERESA FIRE DEPARTMENT	100.00	1/7/2025	38th ANNUAL ICE FISHING DERBY			Shannon - Philadelphia
	2025 Total	2,700.00					
	LYNDON MATTESON	270.00	10/3/2024	ROTARY SPONSORSHIP (GREECE LITTLE LEAGUE)			LYNDON MATTESON
	CLAXTON-HEPBURN MEDICAL CENTER AUXILIARY	125.00	9/3/2024	21th ANNUAL FESTIVAL OF THE TREES -2024			Ogdensburg - Denise
	UNIVERSITY OF ROCHESTER	3,000.00	7/1/2024	HIGHLAND HOSPITAL GALA			Chris/Michelle
	THE FIRST PRESBYTERIAN CHURCH	50.00	5/10/2024	4TH AMAZING RACE AROUND OGDENSBURG			Ogdensburg - Denise
	AMERICAN CANCER SOCIETY	100.00	5/10/2024	RELAY FOR LIFE TRACK SIGN			Shannon - Philadelphia
	GOUVERNEUR BREAST CANCER FUND	250.00	5/10/2024	23rd ANNUAL CANCER FUND WALK			Ogdensburg - Denise
	PHILADELPHIA UNITED METHODIST CHURCH	100.00	4/10/2021	CHURCH STEEPLER ROOF RESTORATION PROJECT			Shannon - Philadelphia
	ABILITY PARTNERS FOUNDATION	500.00	4/1/2024	HONORING HEROES GALA AND AUCTION THE FINGER LAKES			Chris/Michelle
	GREATER ROCHESTER CHAMBER OF COMMERCE - VIA AMEX	500.00	3/11/2024	YOUNG WOMEN OF DISTINCTION SCHOLARSHIP			Chris/Michelle
	SONS OF THE AMERICAN LEGION	100.00	1/9/2024	CC 59382			Chris/Michelle
	2024 Total	4,995.00					
	INDIAN RIVER HIGH SCHOOL	200.00	12/18/2023	EMS CLUB DONATION			Shannon - Philadelphia
	THERESA FIRE DEPARTMENT	100.00	12/8/2023	36th ANNUAL ICE FISHING DERBY			Shannon - Philadelphia
	CLAXTON-HEPBURN MEDICAL CENTER AUXILIARY	100.00	10/10/2023	20th ANNUAL FESTIVAL OF THE TREES -2024			Ogdensburg - Denise
	HEVRETH DRAMA DEPARTMENT	40.00	9/28/2023	????			Chris/Michelle
	EAST HOUSE	1,000.00	9/20/2023	HOPE & RECOVERY CELEBRATION			Chris/Michelle
	THE FIRST PRESBYTERIAN CHURCH	50.00	7/10/2023	3rd AMAZING RACE AROUND OGDENSBURG			Ogdensburg - Denise
	GRACIOUS FRIENDS ANIMAL SANCTUARY	100.00	6/29/2023	DONATION			Chris/Michelle
	FORT DE LA PRESENTATION	100.00	6/20/2023	DONATION - CC 58864			Ogdensburg - Denise
	AMERICAN CANCER SOCIETY	100.00	6/2/2023	RELAY FOR LIFE TRACK SIGN			Shannon - Philadelphia
	COMMUNITY BANKERS WEBINAR NETWORK- VIA AMEX	259.00	4/14/2023	WEBINAR			Mike Georg AMEX
	GOUVERNEUR BREAST CANCER FUND	100.00	3/24/2023	22nd ANNUAL CANCER FUND WALK			Ogdensburg - Denise
	ABILITY PARTNERS FOUNDATION	500.00	3/23/2023	HONORING HEROES GALA AND AUCTION THE FINGER LAKES			Chris/Michelle
	ST. AGNES SCHOOL FOUNDATION - VIA AMEX	50.00	3/16/2023	IN MEMORY OF KIM DOUGHERTY, GENESEE PENNY SAVER			Chris/Michelle
	REALTOR ASSOCIATION VIA AMEX	285.00	2/17/2023	????			Chris/Michelle
	THERESA FIRE DEPARTMENT	75.00	1/13/2023	35th ANNUAL ICE FISHING DERBY			Shannon - Philadelphia
	WADDINGTON AMERICAN LEGION POST 420	50.00	1/11/2025	ICE FISHING DERBY - RAISE FUNDS FOR SCHOLARSHIPS			Ogdensburg - Denise
	2023 Total	3,109.00					

1/1/2023 - 12/31/2025

Associate Community Volunteer Hours

2023 - 2025

Associate	Organization	Total Hours
Gwen Grab	Treasurer of the Scottsville Free Library Association	28
Shannon Smith	Relay for Life Team, with the American Cancer Society	45
	Asked to speak to all the Health Classes at the local School in January.	
	The Health Teacher includes a class on Financial Wealth in her program. She hopes to inspire her students to start thinking about saving for their future.	
	We talk about all sort of topics ranging from Checking Accounts, Savings Accounts, CDs to Fraud.	
	I also hand out swag to the students as well.	
Tara Turner	Philadelphia Vol Fire Department	800
Robyn Bango	Oxbow Historical Association	200
	Oxbow Flag & Banner Committee	15
	Jefferson County Republican Committee	30
	Jefferson County American Heart Association	15
Amy Haberman	Adopt Me! Bluegrass Animal Rescue	40
	Lowe Elementary School PTA	45
	Rm Parent 4 th and 5 th grade/ Lowe Elementary School	15
Erika Unger	Gananda Community Youth Theater	230
	Gananda Varsity Track	28
	Gananda Racing and Aquatic Team	14
Sean Connor	Director on the Board of the Jamestown City Center	150
	Development Committee (aka Northwest Arena)	
	Chautauqua Regional Community Foundation	14
Tom O'Neil	Bishop Kearney High School Volunteer	75

	Pine Ridge Condo Association, Florida	120
Ogdensburg Branch	Trunk or treat for the community at Blevins, and at Renewal house Light up the night parade to ring in the holiday season for the community Collecting toys for Toys for Tots to ensure no child is left out at Christmas	
Suzanne Redonnet	Volunteer AEMT and on the board of North Seneca Ambulance in Waterloo since 2017. Currently President/ Chair of the Board of Directors.	100