## Ledyard National Bank

## CRA Public File

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## Exhibit I

**Public Comments** 

319 US Route 5 South Norwich, Vermont 05055 T: 802.649.3268 F: 802.649.3270



www.FamilyPlaceVT.org @FamilyPlaceVT on Twitter Facebook.com/FamilyPlaceVT

January 25, 2019

Federal Tax ID #03-0305264

Ledyard National Bank Attn: Jeffrey H. Marks, Senior Vice President & Chief Marketing Officer P.O. Box 799 Hanover, NH 03755

Dear Mr. Marks,

On behalf of the staff and board at The Family Place, I want to thank Ledyard National Bank for your generous \$5,000 donation to our Force for the Future Luncheon as the Lead Sponsor. We are very grateful to have Ledyard National Bank join us in our effort to raise awareness of and support for the health and well-being of children and families in the Upper Valley.

It is our belief that every family should have the chance to reach their full potential, and we are honored to have your partnership in helping them. Last year, we provided 1,414 children in 1,074 families with critical services such as counseling, case management, high quality childcare, education, food for foodinsecure families, home visits, developmental screenings and so much more.

We are excited to have Melanie Berry, Director of Innovation Strategies at the Center on the Developing Child at Harvard University, as our keynote speaker. Melanie Berry provides strategic leadership around the incubation of promising new programs as part of the Center's innovation pipeline. She is part of the team that developed Frontiers of Innovation's model for program development and evaluation, the IDEAS Impact Framework. Prior to joining the Center, she was a clinical scientist with the Stress Neurobiology and Prevention Laboratory at the University of Oregon. Dr. Berry holds a doctoral degree in clinical psychology from the PGSP-Stanford Psy.D. Consortium and has extensive experience serving high-risk children and their parents, particularly families who are involved with the child welfare system.

Once again, thank you so very much! We will contact you in the upcoming weeks regarding complimentary tickets to the event. If you have any questions regarding the luncheon, email forceforthefuture@the-family-place.org or please call 802-649-3268.

Sincerely,

Nancy Bloomfield

**Executive Director** 

We are gratiful, Tels!

Your gift is tax deductible for income tax purposes to the extent permitted by law. In compliance with IRS guidelines, I confirm that no goods or services were provided to you in return for your donation.

#### **BOARD OF DIRECTORS**



226 Holiday Drive, Suite 20 • White River Junction, VT 05001

802.291.7000 • Fax: 802.291.7273 • TTY: 711

Email: info@tphtrust.org • Website: twinpineshousing.org

February 21, 2019

Alanna Mayer Ledyard National Bank PO Box 799 Hanover, NH 03755-0799

Dear Alanna,

We're so grateful for Ledyard Bank and how much your organization cares about our community. Your recent \$2,500.00 gift for renovations to the Village at Crafts Hill will help turn the 100 apartments there into warm, welcoming homes for residents.

We're excited about what 2019 has in store for Twin Pines Housing. In addition to the energy efficiency improvements at the Villages at Crafts Hill, we'll also be creating a much needed community building. Construction is well underway at Wentworth Community Housing in White River Junction and Tracy Community Housing in West Lebanon. When complete later this summer, we'll be able to welcome 59 families into new homes. We're especially proud of the property at Tracy Street. The building is designed to net-zero and passive house standards, and will be the first net-zero multi-family building in New Hampshire. While obtaining funding for an affordable housing project of this kind is complicated at best, we hope it will be a model for the creation of future environmentally friendly multi-family homes. In the coming months we'll also begin the first phase of construction at Summer Park senior housing in Hanover. And we continue to explore other opportunities to develop additional housing throughout the area.

While all of this construction happens, we'll continue to grow our supportive services to ensure that our residents have the essential supports they need to help them stay housed. So many middle- and low-income families in the Upper Valley live paycheck to paycheck. One family emergency, expensive car repair, or exorbitant heating bill can cause their finances to unravel. When one of our residents experiences a challenge, Twin Pines Housing's team works with them to develop payment plans, access emergency financial supports, and utilize area food pantries and community dinners to stabilize their lives and give them hope for a brighter future. One resident has shared that living at one of our properties and accessing resident services "has given us the ability to provide for our family and to save for our own home one day."

We're able to provide our residents with hope because of supporters like you. Thank you!

Sincerely,

Andrew B. Winter Executive Director

andrew.winter@tphtrust.org

That you to hedgand for all you do to support

No goods or services were provided in exchange for this gift. Twin Pines Housing is an exempt organization as described in Section 501(c)(3) of the Internal Revenue Code; EIN# 22-2809527.



We raised \$290 in donations for the American Heart Association from over half of our employees who chose to **Go Red for Women** and wear jeans last week!





September 9, 2021

Julia Gigroux Marketing Coordinator Ledyard National Bank 38 South Main Street Hanover, NH 03755

Dear Julia,

I want to thank Ledyard National Bank for their September 1, 2021 donation of \$1,000.00 in the name of Sue Bean, your Concord Regional Winner for the photo submitted as part of your 30<sup>th</sup> Anniversary Calendar Photo Contest. Every act of generosity furthers our mission to support individuals with disabilities live full and vibrant lives in community.

Your donation makes it possible for GSIL to operate 20 distinct programs and services including but not limited to: employment assistance, transportation, financial counseling, consumer directed in-home supports, community living services, student transition, peer support, and home modifications for accessibility. These programs and services benefit hundreds of consumers statewide, 90% of whom live on low and/or fixed incomes. Access to these services at little or no cost is critical to their wellbeing.

Your donation ensures GSIL's consumers find peace of mind, a roof over their heads, and the ability to live without compromise.

Sincerely,

Lisabritt Solsky, JD, CHIE Vice President of Strategy and Corporate Development



Julia Gignoux Marketing Coordinator Ledyard National Bank 38 Main Street Hanover, NH 03755

September 22, 2020

Dear Julia,

Thank you and Ledyard National Bank for your generosity in sponsoring our inaugural Bluegrass BBQ fundraiser. Your Silver sponsorship of \$500.00 was received on August 3, 2020. We are especially grateful for your support of the Concord Coalition to End Homelessness (CCEH) during this challenging time of COVID-19.

We were fortunate that we could shift gears and host the Bluegrass BBQ as a safe, socially distanced, "lipsmackin good" event along the park outside the Everett Arena in Concord. As with our other annual fundraisers, SouperFest and the Talent Show, beyond being fun-filled community happenings, this event raised awareness about CCEH's work and the importance of our mission.

Our goal during this pandemic is to slow the spread of the virus, and keep our staff and guests safe, while continuing to provide essential services to people struggling with homelessness. With your support we continue to:

- operate our daytime Resource Center serving up to 70 guests per day,
- place new clients in permanent housing as part of our Housing First program,
- move forward with preparing the Green Street Apartments for four individuals coming from homelessness,

and we are re-designing out Winter Shelter to adjust for COVID-19 protocols and safely provide beds for folks starting in December.

CCEH will continue to lead the community to permanent solutions to homelessness and to address the immediate needs of individuals. Our vision is a Concord community where everyone has a safe, decent, stable and affordable place to live. You are a vital partner in making this vision a reality. Thank you!

Sincerely,

Ellen Groh

**Executive Director** 

The king to so were to house were.

The Concord Coalition to End Homelessness is a 501(c)(3) charitable organization. Donations are tax deductible to the extent allowed by law. No goods or services were provided in exchange for your donation.



60 Hanover Street Lebanon, NH 03766 (603)448-4553 www.listencs.org

May 7, 2020

Ledyard National Bank P.O. Box 799 38 Main Street C/O Julia Gignoux Hanover, NH 03755

Dear Julia,

On behalf of all of us at LISTEN, thank you for your recent gift of \$2000 (check no. #100946) in support of our Community Dinners Program. Please also send our deepest gratitude to your President, Kathryn Underwood. Without your support, we could not respond to the growing number of requests for help we are receiving from people across the Upper Valley. Your tax-deductible gift will provide hope and resources to families, children, and seniors right here and right now.

For many people in our community who are living paycheck to paycheck, on a fixed income, or now find themselves unemployed, their ability to support themselves is in serious jeopardy. I want to assure you that **LISTEN** is committed to leveraging every resource that we can to get much-needed assistance to our neighbors. With your help, we will continue to do our best to meet the demand for food and other vital services during the coming weeks and months.

Our food pantry in Lebanon is busier than ever before. Fully one-third of the people that we recently served
have never visited our pantry before this month.

• The demand for LISTEN's community dinners has doubled. We are now serving over 200 meals take-out meals 6 nights a week including to several homeless friends being housed in nearby hotels.

The outpouring of generosity from across the Upper Valley has been a tremendous boost to LISTEN's impact over the past few months, as we partner together to keep our community safe during the COVID-19 crisis. We will continue to do so, despite COVID-19, as financial, staff, and volunteer resources are available for us. Our mission has always been important; today, it may be more so than ever before.

I know I speak for our staff and the thousands of Upper Valley individuals and families: your kindness is making a difference every day. We are grateful for our community. We are grateful for you.

If you would like to know more about our programs, please do not he sitate to contact me at kyle@listencs.org or (603)

448-4553.

Thank you,

John Lipsetful gift at such a capital time for our dinner

Kole Fisher

Executive Director program and tlose who rely on it. Warmly.

IMPORTANT TAX INFORMATION

Current income tax laws require that nonprofit charities provide benefactors with a written substantiation for effts. If applicable, retain this letter as your receipt for the gift described above. LISTEN's tax-exempt number is #23-7225952. LISTEN did not provide any goods or services to the contributor in consideration for the contribution. We do not rent,

loan or sell our donor list.
LISTEN provides services and support to meet the critical needs of the Upper Valley.

DE- Talo chill have and large Check at our Flanour st location to I show and



January 15, 2021

Jeff Marks Ledyard National Bank PO Box 799 38 South Main Street Hanover, NH 03755

Dear Jeff,

Thank you so much for renewing your membership in the Montshire Business Partnership (MBP) program with a contribution of \$450. Your support is gratefully appreciated as we navigate the ongoing public health crisis and work to serve the science needs of families and schools in our community.

Your partnership contribution helps support exhibitions and programs in the natural and physical sciences, ecology, engineering, and technology; strengthen science education in regional schools through the *Montshire STEM Alliance* and other outreach programs; and invest in the *Warm Welcome* program for economically disadvantaged families. Opportunities for inquiry-based science learning include *Montshire at Home*, our online learning series; virtual STEM and STEAM workshops adapted for the unique educational challenges that families and schools face this year; and exhibitions designed for both science discovery and public health best practices.

We are fortunate to partner with community-minded companies like Ledyard National Bank, which help make the Upper Valley a wonderful place to work, play, live, and learn. Thank you again!

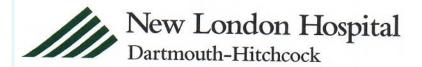
Jennifer Rickards Deputy Director

cc: Julia Gignoux

For income tax purposes, please note that MBP members receive 10 free admission passes with an estimated fair market value of \$14.50 each. The value of membership and other donor benefits is not substantial, so your payment is tax-deductible to the extent provided by IRS guidelines.

That cyon!

ONE MONTSHIRE ROAD
NORWICH, VERMONT 05055
802.649.2200
WWW.MONTSHIRE.ORG



May 29, 2020

Ledyard National Bank Julia Gignoux PO Box 799 Hanover, NH 03755

Dear Julia,

On behalf of the staff and patients of New London Hospital (NLH), we are grateful for your sponsorship of \$1,000.00 at the Birdie level. While we had to cancel our traditional golf tournament due to COVID-19 precautions, offering a season-long alternative allows NLH to still benefit from the charitable contributions that sponsorships provide, and we thank you for partnering with us in this unique way.

During the COVID-19 pandemic, NLH has been actively involved in the preparedness and response needed to care for the community and our patients–resulting in unbudgeted, mounting expenses. Ledyard National Bank sponsorship will help to ensure that the ongoing needs of the hospital continue to be met through this crisis and beyond, especially as they change with time.

Throughout the years, NLH's golf tournament has raised more than \$325,000 through the generosity of our dedicated sponsors, committed players and individual golf tournament supporters. We are thrilled that despite this year's unprecedented challenges, we can continue to rely on the dedication of community members like you.

We are looking forward to a great season at Baker Hill!

Sincerely,

Kathleen Kennedy

Director, Community Relations and Development

kathleen.kenned@newlondonhosptial.org

603-526-5322

New London Hospital provides no goods or services in return for this contribution, unless donor sends sponsorship-funded players to tournament, in which case it is estimated that \$85 per player is "value received," with the balance representing a contribution that is tax-deductible as provided by law. Please retain this letter for your records.

## Exhibit II

Public Disclosure

## INTERMEDIATE SMALL BANK

## **PUBLIC DISCLOSURE**

November 26, 2018

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Ledyard National Bank

Charter Number 22210

320 Main Street, Norwich, VT 05055

Office of the Comptroller of the Currency

99 Summer Street, Suite 1400, Boston, MA 02110

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: Satisfactory**

The Lending Test is rated: Satisfactory
The Community Development Test is rated: Satisfactory

The major factors supporting the institution's CRA rating are:

- The Bank's level of lending, as reflected by its loan-to-deposit (LTD) ratio, is considered reasonable given its size, scope of operations, and the credit needs of the assessment area (AA).
- A substantial majority of the Bank's primary lending products were originated and/or purchased within the delineated AAs.
- Overall, the distribution of loans reflects reasonable penetration among borrowers of different incomes and to businesses of different sizes across both rating areas.
- There were no CRA-related complaints received by the Bank or the OCC during the evaluation period.
- Overall, the Bank's level of CD responsiveness is considered reasonable given the Bank's record of CD loans, investments/donations, and services.

## **Definitions and Common Abbreviations**

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**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 MA/assessment area.

Census Tract (CT): 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 areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their 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: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 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 MA/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. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**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 multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state 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) 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 One 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.

## **Description of Institution**

Ledyard National Bank ("LNB", "Ledyard", or "the Bank") is an interstate bank headquartered in Norwich, Vermont (VT). The Bank opened in 1991 in Hanover, New Hampshire (NH) and is wholly owned by Ledyard Financial Group, Inc., a one-bank holding company. LNB operates seven full-service branches located in the Upper Valley region of NH and VT. In addition to the main branch located in VT, LNB operates six additional branches in the NH towns of Lebanon, Lyme, New London, West Lebanon, and Hanover. The Lebanon, NH and West Lebanon, NH branches are located in middle-income geographies, while all other branches are located in upper-income geographies. No branches were opened or closed during the evaluation period. LNB also has an asset management group, Ledyard Financial Advisors, whose activities were not considered in evaluating the Bank's overall CRA performance.

Ledyard offers a standard array of loan and deposit products for both personal and business customers. Consumer loan products include residential mortgage loans, home equity lines of credit, and consumer loans. Commercial loan products include commercial real estate loans and Small Business Administration (SBA) guaranteed loans. All branches are open weekdays 9:00AM to 5:00PM and Saturdays 9:00AM to 12:00PM. Drive-up hours vary slightly by branch, but are generally in line with branch hours. Automated teller machines (ATMs) are located at each of the seven branches. The Bank's website, www.ledyardbank.com, provides a full listing and description of loan products and deposit services. The Bank offers a variety of different account access alternatives including online banking with bill pay options and mobile banking.

As of September 30, 2018, LNB had total assets of \$495 million, net tier 1 capital of \$45 million and total deposits of \$416 million. The loan portfolio totaled \$312 million, or 63 percent of total assets as of the same date. The loan portfolio has grown 15 percent since the prior CRA evaluation in 2015, but the loan mix has remained consistent. The following table provides a summary of the loan mix by product type:

Table 1 – Loan Portfolio Summary by Loan Product September 30, 2018							
Loan Category	% of Gross Loans and Leases						
1-4 Family Residential Mortgage	42.63						
Commercial Real Estate	36.48						
Commercial & Industrial	11.55						
Consumer	4.31						
Multifamily	3.92						
Construction & Development	0.99						
Other	<1.00						
Total	100%						

Source: FDIC Call Report

There are no legal, financial, or other factors impeding the Bank's ability to help meet the credit needs in its assessment areas. During the last CRA Performance Evaluation dated December 10, 2015, Ledvard received a Satisfactory rating.

## Scope of the Evaluation

#### **Evaluation Period/Products Evaluated**

The Bank's CRA performance was assessed using Intermediate Small Bank (ISB) CRA evaluation procedures. The ISB procedures include a Lending Test and a Community Development (CD) Test. The Lending Test evaluates the Bank's record of performance in meeting AA credit needs over the evaluation period, through its record of lending. The CD Test evaluates the Bank's performance in meeting community development needs over the period, through its record of engaging in qualified CD activities including CD lending, CD investments, and CD services.

The evaluation period for the Lending Test covers the Bank's performance from January 1, 2016 through December 31, 2017. Due to updates made to the demographic information during the evaluation period, the Bank's performance during 2016 was evaluated independently of 2017 performance metrics. The Bank's lending performance for 2016 was compared to the 2010 U.S. Census Data. The Bank's performance for 2017 was compared to the 2015 American Community Survey (ACS) data. When evaluating the Bank's overall lending performance, emphasis was placed on loans originated during the 2016 evaluation period, as the majority of the Bank's lending, or 53 percent, occurred during 2016.

The Bank's primary lending products, based on loan originations during the evaluation period, are residential home mortgage and commercial-small business loans. Residential home mortgage loans includes home purchase, improvement, and refinance lending products. Among all loans originated and/or purchased during our evaluation period, residential home mortgage and commercial-small business loans accounted for approximately 41 and 30 percent, respectively.

The evaluation period for the CD Test covers the Bank's performance from January 1, 2016 through December 31, 2017. CD loans, investments, and services submitted by the Bank were reviewed for CRA eligibility to ensure they meet the regulatory definition for community development.

## Data Integrity

The Bank is not subject to the reporting requirements of the HDMA. After identifying residential home mortgage and commercial-small business loans as primary products, we uploaded an electronic listing of these products into CRA reporting software. From this, we were able to draw conclusions regarding the Bank's lending performance according to the CRA. Prior to the generation of performance metric results, we conducted data integrity procedures to ensure data accuracy and to validate the integrity of the Bank's reporting systems. No data integrity issues were identified and we found the Bank's submission of loan data to be reliable.

The activities presented for CD consideration by the Bank were also reviewed for the purpose of determining whether the activities met the regulatory definition of community development.

#### Selection of Areas for Full-Scope Review

The CRA requires an institution to define the AA in which it will be evaluated. Ledyard's delineated AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies. We selected the Bank's entire AA, which includes all branches/deposit taking ATMs and the surrounding contiguous CTs, for assessment according to the CRA.

As previously indicated, Ledyard functions as an interstate institution and has banking operations in NH and VT. For each state we conducted a full-scope review, resulting in the delineation of two full-scope rating areas, NH\_AA1 and VT\_AA2, both of which are comprised entirely of nonmetropolitan statistical area (nonMSA) (#99999) geographies and collectively account for LNB's entire AA.

The full-scope AA1 is a New Hampshire-based, nonMSA (#99999) and is composed of contiguous geographies across portions of Grafton, Merrimack, and Sullivan Counties. As of June 30, 2017, this full-scope area contained six of seven LNB branches and approximately 81 percent of the Bank's total deposits according to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report. Additionally, when considering primary products that were originated/purchased during our evaluation period, the full-scope AA1 accounted for approximately 58 and 47 percent of all residential home mortgages and commercial small-business loans, respectively.

The full-scope AA2 is a Vermont-based, nonmetropolitan statistical area (#99999) and is composed of contiguous geographies across portions of Orange and Windsor Counties. As of June 30, 2017, this full-scope area contained one of seven LNB branches and approximately 19 percent of the Bank's total deposits according to the FDIC Deposit Market Share Report. Additionally, when considering primary products that were originated/purchased during our evaluation period, the full-scope AA2 accounted for approximately 33 and 31 percent of all residential home mortgage and commercial small-business loans, respectively.

Please refer to Appendix C of this evaluation for further discussion surrounding the Community Profiles of the Bank's full-scope AAs.

## Ratings

The Bank's overall rating is based primarily on the areas that received full-scope reviews. Full-scope reviews were performed on two nonMSA AAs (NH\_AA1 and VT\_AA2). For purposes of this evaluation, both of the nonMSA AAs were considered separate rating areas. The results of each rating area were aggregated to determine Ledyard's overall CRA rating.

The Bank's performance during the 2016 evaluation period was more heavily weighted when arriving at overall conclusions as 53 percent of the Bank's lending occurred during this period. Additionally, the NH\_AA1 was given more weight when drawing final conclusions as this AA accounted for 58 and 47 percent of all Bank originated/purchased residential home mortgage and commercial-small business loans and LNB maintains approximately 81 percent of their deposits within NH.

## Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## **Conclusions with Respect to Performance Criteria**

Ledyard National Bank's overall performance under the Lending Test is considered Satisfactory. The Bank's loan-to-deposit ratio is considered reasonable given performance context and a substantial majority of Ledyard's primary lending products were originated and/or purchased within the delineated AAs. Overall, the distribution of loans reflects reasonable penetration among borrowers of different incomes and to businesses of different sizes. An assessment of Ledyard's geographic distribution of lending was not performed as there are no low- or moderate-income census tracts within the AA. There were no CRA-related complaints received by the Bank or the OCC during the evaluation period. Overall, the Bank's level of CD responsiveness is considered reasonable given the Bank's record of CD loans, investments/donations, and services.

#### Loan-to-Deposit Ratio

The Bank's LTD ratio is considered reasonable given LNB's size, financial condition, and significant competition limiting opportunities for lending within the AA. The Bank's net LTD ratio averaged 72 percent for the eight quarters occurring during the evaluation period. During this period, the Bank's LTD ratio ranged from a quarterly low of 70 percent to a quarterly high of 74 percent. The Bank's LTD ratio is lower than the local peer average of 93 percent over the same period. Among local peers, the average LTD ratio ranged from a low of 62 percent to a high of 110 percent. The Bank's LTD ratio is also lower than the national peer bank quarterly average of 81 percent over the same period.

#### Lending in Assessment Area

A substantial majority of the Bank's primary lending products were originated and/or purchased within the delineated AA, meeting the standard for outstanding performance. Ledyard originated and/or purchased approximately 85 percent by number and 79 percent by dollar amount of loans in the AA from 2016 to 2017.

The following table details the Bank's lending within the AA by number and dollar amount of loans:

Table 2 - Lending Inside and Outside of the Assessment Area										
	N	umber	of Loans			Dollar An	nount c	of Loans \$	(000s)	
Loan Category	Insid	de	Outsi	de	Total	Insid	le	Outsi	de	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2016	146	91.3	14	8.8	160	33,493	83.9	6,451	16.2	39,944
2017	106	89.8	12	10.2	118	23,070	83.5	4,543	16.5	27,613
Subtotal	252	90.6	26	9.4	278	56,563	83.7	10,994	16.3	67,557
Small Business									<del></del>	
2016	78	78.8	21	21.2	99	27,991	72.3	10,744	27.7	38,735
2017	79	76.7	24	23.3	103	23,805	78.6	6,500	21.4	30,305
Subtotal	157	77.7	45	22.3	202	51,796	75.0	17,244	25.0	69,040
Total	409	85.2	71	14.8	480	108,359	79.3	28,238	20.7	136,597

Source: Evaluation Period: 1/1/2016 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0

## **State Rating**

#### State of New Hampshire

**CRA** rating for New Hampshire:

Satisfactory

The lending test is rated:

Satisfactory

The community development test is rated:

Satisfactory

The major factors supporting this rating include:

- The borrower distribution of loans overall reflects reasonable penetration among both individuals of different income levels and businesses of different sizes.
- The Bank's community development performance demonstrates reasonable responsiveness to community development needs in its AA through CD loans, investments/donations, and services.

## Description of Institution's Operations in New Hampshire

The full-scope AA1 is a New Hampshire-based, nonmetropolitan statistical area (#99999) and is composed of contiguous geographies across portions of Grafton, Merrimack, and Sullivan Counties. The NH\_AA1 consists of 17 CTs, which includes seven upper-income tracts and ten middle-income tracts. As of June 30, 2017, this full-scope area contained six of seven LNB branches and approximately 81 percent of the Bank's total deposits according to the FDIC Deposit Market Share Report. Additionally, when considering primary products originated/purchased during our evaluation period of January 1, 2016 through December 31, 2017, the full-scope AA1 accounted for approximately 58 and 47 percent of all residential home mortgages and commercial small-business loans, respectively.

Please refer to Appendix C of this evaluation for further discussion surrounding the Community Profiles of the Bank's full-scope AAs.

## Scope of Evaluation in New Hampshire

We performed a full-scope review of the New Hampshire AA1. Performance within the NH\_AA1 was given the most weight overall when drawing conclusions as the majority of the Bank's operations, including deposit base, lending activity, and branch presence are located within this rating area.

In assessing the Bank's performance, we reached out to several bank contacts in an effort to obtain a better understanding of the credit needs facing the local communities in which the Bank serves. We were unable to make a contact during this evaluation; however, we did reference other community contacts of recent CRA PEs conducted within NH and VT to determine credit needs.

Recent CRA PEs performed in NH indicate that affordable housing, financial literacy, and community services, including access to credit, are significant community development needs

within the NH\_AA1, in addition to basic human needs, such as food and shelter for at risk groups.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

#### **LENDING TEST**

The Bank's performance under the Lending Test in New Hampshire is rated Satisfactory. The distribution of primary lending products overall reflects reasonable penetration among borrowers of different incomes and to businesses of different sizes. A geographic analysis of primary lending products was not performed, as the NH\_AA1 does not include any low- or moderate-income CTs.

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

Ledyard National Bank's distribution of residential home mortgage and commercial-small business loans reflects excellent penetration to borrowers of different incomes and reasonable penetration to businesses of different sizes, given competitive barriers within AA1 and the Bank's volume of lending. The level of home mortgage and small business lending was compared to aggregate peer data, our primary comparator.

Residential Home Mortgage Lending 2016

The overall distribution of home mortgage lending during the 2016 evaluation period reflects excellent penetration amongst borrowers of different income levels. The percentage of home mortgage loans made to both low- and moderate-income borrowers exceeds the aggregate lending data.

The following table illustrates the distribution of home loans to borrowers of different income levels within the NH\_AA1 during 2016:

	Table 3A – Borrower Distribution of Residential Real Estate Loans in Ledyard NH_AA1 nonMSAs (99999) 2016												
Borrower Income Level	Lov	Low Moderate Middle			Low Moderate Middle Uppe			er					
Loan Type	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans					
Home Loans	2.6	14.4	15.0	21.6	19.4	7.2	49.1	56.7					

Source: Bank submitted data of home mortgage loans originated and/or purchased during 2016; 2016 Peer Mortgage Data. Due to rounding, totals may not equal 100.00. Approximately 13.8 percent of borrowers within this AA during 2016 did not have a reportable income.

#### Residential Home Mortgage Lending 2017

The overall distribution of home mortgage lending during the 2017 evaluation period reflects excellent penetration amongst borrowers of different income levels. The percentage of home mortgage loans made to both low- and moderate-income borrowers exceeds the aggregate lending data.

The following table illustrates the distribution of home loans to borrowers of different income levels within the NH\_AA1 during 2017:

12 Par 12 Pa 12 Pa	Table 3B – Borrower Distribution of Residential Real Estate Loans in Ledyard NH_AA1 nonMSAs (#99999) 2017													
Borrower Income Level	Lov	<b>N</b>	Moderate Middle		Upper									
Loan Type	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans						
Home Loans	4.5	17.5	15.0	22.2	19.7	14.3	46.7	46.0						

Source: Bank submitted data of home mortgage loans originated and/or purchased during 2017; 2017 Peer Mortgage Data. Due to rounding, totals may not equal 100.00. Approximately 14.2 percent of borrowers within this AA during 2017 did not have a reportable income.

#### Small Business Lending 2016

The Bank's distribution of commercial small business loans originated/purchased during 2016 is considered reasonable when factoring demographic characteristics of the AA and competitive market factors that limit lending opportunities.

LNB's level of lending to small businesses is significantly below the percentage of 2016 peer aggregate small business lending data, our primary comparator. According to 2016 Peer Small Business data, competition for small business loans within the NH\_AA1 is significant and limits lending opportunities. The top three lenders account for nearly 63 percent of the entire market. During this period, the Bank originated 14 small business loans. When compared to the 2016 Peer Small Business data results, this would account for 0.65 percent of the market and rank Ledyard as the 13<sup>th</sup> largest lender amongst a peer group of 78 lenders, highlighting the significant level of competition for small business lending.

The following table shows the distribution of commercial small business loans among businesses of different sizes by both count and dollar amount of loans:

Table 3C - Borrower Distribution of Commercial Small Businesses Loans in Ledyard NH_AA1 nonMSAs (#99999) 2016										
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total						
% Peer Aggregate Lending to AA Businesses	47.5			100.00						
% of Bank Loans in AA by #	28.6	71.4	0.00	100.00						
% of Bank Loans in AA by \$	12.6	87.4	0.00	100.00						

Source: Bank submitted data of commercial-small business loans originated and/or purchased during 2016; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.

#### Small Business Lending 2017

The Bank's distribution of commercial small business loans originated/purchased during 2017 is considered reasonable when factoring demographic characteristics of the AA and competitive market factors that limit lending opportunities.

Ledyard's level of lending to small businesses is within a reasonable range below the percentage of 2017 peer aggregate small businesses lending data, our primary comparator. According to 2017 Peer Small Business data, competition for small business loans within the NH\_AA1 remains high. The top three lenders within this space account for approximately 53 percent of the entire market. During this period, the Bank originated 21 small business loans. When compared to the 2017 Peer Small Business data results, this would account for less than one percent of the market and rank LNB as the 15<sup>th</sup> largest lender amongst a peer group of 83 lenders, highlighting the significant level of competition for small business lending.

The following table shows the distribution of commercial small business loans among businesses of different sizes by both count and dollar amount of loans:

Table 3D - Borrower Distribution of Commercial Small Businesses Loans in Ledyard NH_AA1 nonMSAs (#99999) 2017										
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total						
% Peer Aggregate Lending to AA Businesses	50.1			100.00						
% of Bank Loans in AA by #	46.7	53.3	0.00	100.00						
% of Bank Loans in AA by \$	23.1	76.9	0.00	100.00						

Source: Bank submitted data of commercial-small business loans originated and/or purchased during 2017; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.

#### Geographic Distribution of Loans

An analysis of the geographic distribution of loans was not performed, as there are no low- or moderate-income census tracts within the Bank's NH\_AA1.

#### **Responses to Complaints**

There were no CRA-related complaints received by the Bank or the OCC during the evaluation period pertaining to the full-scope NH AA1.

#### COMMUNITY DEVELOPMENT TEST

The Bank's performance under the CD test in the NH\_AA1 is rated Satisfactory. The Bank's community development performance demonstrates reasonable responsiveness to community development needs in its AA through CD loans, investments/donations, and services.

#### **Number and Amount of Community Development Loans**

The Bank originated a reasonable amount of CD loans during the evaluation period. The Bank originated two loans totaling \$200 thousand during the evaluation period that qualified as community development loans. The CD loans made by the Bank provide financing to a community organization located within NH that promotes CD activities such as affordable housing and community services for at risk groups.

#### Number and Amount of Qualified Investments

The Bank's level of CD investments within the NH\_AA1 is considered reasonable given the Bank's size, scope of operations, and local community needs. LNB's investments/donations during the evaluation period totaled approximately \$76,460. This is comprised of 56 donations/grants to approximately 36 different community organizations that serve the NH\_AA1. The majority of the Bank's community development investments/donations were targeted towards organizations that provide affordable housing or community services for LMI groups in the area, such as homeless shelters and food banks. While the actual level of Bank donations made was higher, these donations met the definition of community development.

The highlights of the Bank's community development investments/donations are as follows:

- A \$10 thousand grant to a community organization that provides educational and support services to families within the area that are living in poverty.
- The Bank made a \$25 thousand grant to a local community development finance authority to benefit the county senior center in providing services to the elderly and ill.
- A \$1 thousand grant to a local outreach program that offers drug & alcohol counseling to LMI individuals living within the Bank's NH\_AA1.
- The Bank made a \$2 thousand grant to a community development organization that specializes in early childcare and development. Services are provided to primarily LMI families.

Additionally, the Bank made several investments during the evaluation period in the Northern New England Housing Investment Fund – Low Income Housing Tax Credit, totaling approximately \$1.34 million. This fund provides housing assistance to qualifying LMI families and serves the greater Northern New England area, including NH and VT. The services provided by this community development organization benefit Ledyard's NH\_AA1.

#### Extent to Which the Bank Provides Community Development Services

The Bank's level of community development services in the NH\_AA1 is considered reasonable. Accessibility to the Bank's delivery systems in the AA is considered adequate. The bank has six full-service branches located within the NH\_AA1. The Bank does not have any branches in low- or moderate-income CTs as there are no such geographies within the AA.

During the evaluation period, 16 Ledyard employees performed numerous hours of community development eligible services for 11 different organizations within the NH\_AA1. Highlights of the Bank's community development services are as follows:

- A LNB employee served on the Board for a local children's hospital, assisting with the running and oversight of the hospital to ensure continued operation.
- A Bank employee assisted in the reviewing of grant applications for a local organization which provide community development services including grants for affordable housing and economic development purposes.
- An employee served on the Board for a local community group that provides housing and security for at-risk groups, specifically a shelter for battered women.

#### **Responsiveness to Community Development Needs**

Considering the Bank's capacity, identified community needs, and the availability of and competition for CD opportunities, the level of the Bank's CD activities in its NH\_AA1 demonstrates adequate responsiveness to AA community needs.

## **State Rating**

#### State of Vermont

CRA rating for Vermont:

The lending test is rated:

Satisfactory

Satisfactory

The community development test is rated: Satisfactory

The major factors supporting this rating include:

• The borrower distribution of loans overall reflects reasonable penetration among both individuals of different income levels and businesses of different sizes.

• The Bank's community development performance demonstrates reasonable responsiveness to community development needs in its AA through CD loans, investments/donations, and services.

## **Description of Institution's Operations in Vermont**

The full-scope AA2 is a Vermont-based, nonmetropolitan statistical area (#99999) and is composed of contiguous geographies across portions of Orange and Windsor Counties. The VT\_AA2 consists of 11 CTs, which includes five upper-income tracts and six middle-income tracts. As of June 30, 2017, this full-scope area contained only one LNB branch and approximately 19 percent of the Bank's total deposits according to the FDIC Deposit Market Share Report. Additionally, when considering primary products originated/purchased during the evaluation period, AA2 accounted for approximately 33 and 31 percent of all residential home mortgage and commercial small-business loans, respectively.

Please refer to Appendix C of this evaluation for further discussion surrounding the Community Profiles of the Bank's full-scope AAs.

## Scope of Evaluation in Vermont

We performed a full-scope review of the Vermont AA2. Performance within the Bank's Vermont\_AA2 was not weighted as heavily when drawing conclusions as the majority of Ledyard's operational activities occurred within NH.

In assessing the Bank's performance, we reached out to several bank contacts in an effort to obtain a better understanding of the credit needs facing the local communities in which the Bank serves. We were unable to make a contact during this evaluation; however, we did reference other community contacts of recent CRA PEs conducted within NH and VT to determine credit needs.

Recent CRA PEs performed in VT indicate that affordable housing, community services, and economic development initiatives are significant community development needs within the VT\_AA2. The state of VT also faces traditional needs such as access to food and shelter for at risk groups.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

#### **LENDING TEST**

The Bank's performance under the Lending Test in Vermont is rated Satisfactory. The distribution of primary lending products overall reflects reasonable penetration among borrowers of different incomes and to businesses of different sizes. A geographic analysis of primary lending products was not performed, as the VT\_AA2 does not include any low- or moderate-income CTs.

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

Ledyard National Bank's distribution of residential home mortgage and commercial-small business loans reflects reasonable penetration to both borrowers of different incomes and businesses of different sizes, given competitive barriers within the AA2 and the Bank's volume of lending. The level of home mortgage and small business lending was compared to aggregate peer data, our primary comparator.

Residential Home Mortgage Lending 2016

The overall distribution of home mortgage lending during the 2016 evaluation period reflects reasonable penetration amongst borrowers of different income levels. The percentage of home mortgage loans made to moderate-income borrowers exceeds the aggregate lending data. The percentage of home mortgage loans made to low-income borrowers falls within a reasonable range below 2016 peer mortgage data.

According to 2016 Peer Mortgage Market Share Data, there is little opportunity to lend to low-income borrowers within the VT\_AA2, and competition remains significant. In 2016, the top three lenders within this market accounted for approximately half of all originations/purchases, of which there was only a total of 14 loans reported by HMDA. Ledyard originated one residential mortgage to a low-income borrower during 2016. When compared to the aggregate peer data, this would account for 7.14 percent of the market, and rank LNB, as the 4<sup>th</sup> largest lender amongst a peer group of 10 lenders.

The following table illustrates the distribution of home loans to borrowers of different income levels within the VT AA2 during 2016:

Table 4A – Borrower Distribution of Residential Real Estate Loans in Ledyard VT_AA2 nonMSAs (99999) 2016											
Borrower Income Level	Low Moderate Middle						Upp	er			
Loan Type	% of Aggregate Lending Data	% of Bank Loans									
Home Loans	2.3	2.0	11.8	18.4	21.8	18.4	47.4	61.2			

Source: Bank submitted data of home mortgage loans originated and/or purchased during 2016; 2016 Peer Mortgage Data. Due to rounding, totals may not equal 100.00. Approximately 16.8 percent of borrowers within this AA during 2016 did not have a reportable income.

#### Residential Home Mortgage Lending 2017

The overall distribution of home mortgage lending during the 2017 evaluation period reflects reasonable penetration amongst borrowers of different income levels. The percentage of home mortgage loans made to moderate-income borrowers exceeds the aggregate lending data. The Bank did not make any loans to low-income borrowers within the VT\_AA2 during 2017.

Lending to low-income borrowers within the VT\_AA2 remains competitive in 2017 with limited opportunities for lending. According to 2017 Peer Mortgage Market Share Data, among HMDA-reportable institutions in this market area, there were only 21 home mortgage loans originated during 2017 for low-income borrowers. While the top lender had only three instances of lending, this accounted for 14.29 percent of the market. In addition, peer data also indicates that among the 15 lenders, only five had more than once instance of home mortgage lending.

The following table illustrates the distribution of home loans to borrowers of different income levels within the VT\_AA2 during 2017:

	Table 4B – Borrower Distribution of Residential Real Estate Loans in Ledyard VT_AA2 nonMSAs (#99999) 2017											
Borrower Income Level	Low		Moderate Middle		Upp	er						
Loan Type	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans				
Home Loans	3.6	0.0	12.1	34.9	21.0	16.3	50.1	48.8				

Source: Bank submitted data of home mortgage loans originated and/or purchased during 2017; 2017 Peer Mortgage Data. Due to rounding, totals may not equal 100.00. Approximately 13.2 percent of borrowers within this AA during 2017 did not have a reportable income.

#### Small Business Lending 2016

The Bank's distribution of commercial small business loans originated/purchased during 2016 is considered reasonable when accounting for demographic characteristics of the AA and competitive market factors that limit lending opportunities.

LNB's level of lending to small businesses falls below the percentage of 2016 peer aggregate small business lending data, our primary comparator. According to 2016 Peer Small Business data, competition for small business loans within the VT\_AA2 is significant, as the top three lenders within this market account for nearly 61 percent of the entire market, limiting lending opportunities. During this period, the Bank originated ten small business loans. When compared to the 2016 Peer Small Business data results, this would account for approximately 1.51 percent of the market and rank Ledyard as the 14<sup>th</sup> largest lender amongst a peer group of 49 lenders, highlighting the significant level of competition for small business lending.

The following table shows the distribution of commercial small business loans among businesses of different sizes by both count and dollar amount of loans:

Table 4C - Borrower Distribution of Commercial Small Businesses Loans in Ledyard VT_AA2 nonMSAs (#99999) 2016										
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total						
% Peer Aggregate Lending to AA Businesses	44.0		<u> </u>	100.00						
% of Bank Loans in AA by #	34.5	65.5	0.00	100.00						
% of Bank Loans in AA by \$	23.6	76.4	0.00	100.00						

Source: Bank submitted data of commercial-small business loans originated and/or purchased during 2016; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.

#### Small Business Lending 2017

The Bank's distribution of commercial small business loans originated/purchased during 2017 is considered reasonable when factoring demographic characteristics of the AA and competitive market factors that limit lending opportunities.

Ledyard's level of lending to small businesses falls below the percentage of 2017 peer aggregate small businesses lending data, our primary comparator. According to 2017 Peer Small Business data, competition for small business loans within the VT\_AA2 remains high, as the top three lenders within this space account for approximately 54 percent of the entire market. During this period, the Bank originated 14 small business loans. When compared to the 2017 Peer Small Business data results, this would account for approximately 1.6 percent of the market and rank LNB as the 14<sup>th</sup> largest lender amongst a peer group of 59 lenders, highlighting the significant level of competition for small business lending.

The following table shows the distribution of commercial small business loans among businesses of different sizes by both count and dollar amount of loans:

Table 4D - Borrower Distribution of Commercial Small Businesses Loans in Ledyard VT_AA2 nonMSAs (#99999) 2017										
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total						
% Peer Aggregate Lending to AA Businesses	55.4			100.00						
% of Bank Loans in AA by #	41.2	58.8	0.00	100.00						
% of Bank Loans in AA by \$	10.6	89.4	0.00	100.00						

Source: Bank submitted data of commercial-small business loans originated and/or purchased during 2017; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.

#### Geographic Distribution of Loans

An analysis of the geographic distribution of loans was not performed, as there are no low- or moderate-income census tracts within the Bank's VT\_AA2.

#### **Responses to Complaints**

There were no CRA-related complaints received by the Bank or the OCC during the evaluation period pertaining to the full-scope VT\_AA2.

#### COMMUNITY DEVELOPMENT TEST

The Bank's performance under the CD test in the VT\_AA2 is rated Satisfactory. The Bank's community development performance demonstrates reasonable responsiveness to community development needs in its AA through CD loans, investments/donations, and services.

#### **Number and Amount of Community Development Loans**

The Bank originated a reasonable amount of CD loans during the evaluation period. The Bank originated three loans totaling \$1.19 million during the evaluation period that qualified as community development loans. All three CD loans made by the Bank provide financing to community organizations within the VT\_AA2 that provide affordable housing projects for LMI groups benefit. One of the three loans is a \$985 thousand loan to a local affordable housing developer. The Bank has a history of joint CD projects with this borrower and expects the project will continue into the next CRA cycle.

#### Number and Amount of Qualified Investments

The level of CD investments within the VT\_AA2 is considered reasonable given the Bank's size, scope of operations, and local community needs. LNB's investments/donations during the evaluation period totaled approximately \$21,165. This is comprised of 23 donations/grants to approximately 13 different community organizations that serve the VT area. The majority of the Bank's community development investments/donations were targeted towards organizations that provide affordable housing or economic development services targeted towards LMI groups in the area. While the actual level of Bank donations made was higher, these donations met the definition of community development.

The highlights of the Bank's community development investments/donations are as follows:

• A \$2,500 grant to a Vermont-based community organization that promotes and supports programs that help meet the health care needs of low-income residents.

- A \$1,500 grant to a homeless shelter and soup kitchen which also provides housing for LMI groups in the area.
- A \$1,750 grant to an organization that specializes in early childhood educational programs and financial literacy for low-income children and their families.

Additionally, the Bank made several investments during the evaluation period in the Northern New England Housing Investment Fund – Low Income Housing Tax Credit, totaling approximately \$1.34 million. This fund provides housing assistance to qualifying LMI families, and serves the greater Northern New England area, including NH and VT. The services provided by this community development organization benefit Ledyard's VT AA2.

#### **Extent to Which the Bank Provides Community Development Services**

The Bank's level of community development services in the VT\_AA2 is considered reasonable. Accessibility to the Bank's delivery systems in the AA is considered adequate. The Bank has one full-service branch located within the VT\_AA2. The Bank does not have any branches in low- or moderate-income CTs as there are no such geographies within the AA.

During the evaluation period, seven Ledyard employees performed numerous hours of community development eligible services for six different organizations within the VT\_AA2. Highlights of the Bank's community development services are as follows:

- A LNB employee served on the Board for a home ownership and counseling community development organization, which specifically benefits LMI families.
- An employee served on the Board for a local community group that provides visiting nurse and hospice care for the elderly, including LMI patients.

#### Responsiveness to Community Development Needs

Considering the Bank's capacity, identified community needs, and the availability of and competition for CD opportunities, the level of the Bank's CD activities in its VT\_AA2 demonstrates adequate responsiveness to AA community needs.

## **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas 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	Lending Test (excludes loans): Investment and Service and CD Loans:	(01/01/16 to 12/31/17)  Tests (01/01/16 to 12/31/17)			
Financial Institution		Products Reviewed			
Ledyard National Bank ("LNB", "Ledyard", or "the Bank") Norwich, VT		Residential home mortgage and commercial-small business loans, and CD-eligible loans, investments/grants/donations, and services			
Affiliate(s)	Affiliate Relationship	Products Reviewed			
None reviewed.					
List of Assessment Areas and Type of Examination					
Assessment Area	Type of Exam	Other Information			
Ledyard NH_AA1, nonMSAs (#99999)	Full-scope	<ul> <li>NH nonMSAs (#99999)</li> <li>Grafton County (#009)</li> <li>Alexandria, Canaan, Dorchester, Enfield, Grafton, Groton, Hanover, Hebron, Lebanon, Lyme, Orange, Orford, Piermont, Wentworth</li> <li>Merrimack County (#013)</li> <li>Andover, Bradford, Danbury, Hill, Newbury, New London, Salisbury, Sutton, Wilmot</li> <li>Sullivan County (#019)</li> <li>Cornish, Croydon, Grantham, Newport, Plainfield, Springfield, Sunapee</li> </ul>			
Ledyard VT_AA2, nonMSAs (#99999)	Full-scope	<ul> <li>VT nonMSAs (#99999)</li> <li>Orange County (#017)</li> <li>Bradford, Fairlee, Thetford, West Fairlee</li> <li>Windsor County (#027)</li> <li>Barnard, Hartford, Hartland, Norwich, Pomfret, Sharon, Stockbridge, Windsor, Woodstock</li> </ul>			

# **Appendix B: Summary of Multistate Metropolitan Area and State Ratings**

RATINGS Ledyard National Bank			
Overall Bank:	Lending Test Rating	Community Development Test Rating	Overall State Rating
Ledyard National Bank	Satisfactory	Satisfactory	Satisfactory
State Ratings:			
New Hampshire	Satisfactory	Satisfactory	Satisfactory
Vermont	Satisfactory	Satisfactory	Satisfactory

### **Appendix C: Community Profiles for Full-Scope Areas**

### **Description of New Hampshire Assessment Area**

LNB operates primarily in the state of New Hampshire. The AA includes Upper Valley and Lake Sunapee regions. The NH\_AA1 consists of 17 contiguous census tracts, which includes seven upper-income tracts and ten middle-income tracts. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income tracts.

As of May 2018, Moody's Analytics notes the economic indicators for NH are in a late expansion business cycle. Economic drivers include the technology and financial sectors, and NH's unemployment rate of 2.6 percent is the third lowest in the United States. Moody's Analytics indicates that NH will remain a strong performer in the Northeast, which is primarily due to the high-value-added industries, a low tax burden, and an educated workforce. Top employers in the state are Fidelity Investments, Hannaford Bros. Co., Elliot Hospital, BAE Systems Electronic Solutions, and Genesis Healthcare.

Competition remains strong in the market area, as there is a high number of financial institutions within New Hampshire. The FDIC Deposit Market Share reports that there are 21 financial institutions with the Grafton, Merrimack, and Sullivan Counties. The Bank maintains a competitive position within the market, ranked eighth with 4.2 percent of the deposit market share. The top five banks account for 61.9 percent of the total market. Top local competitors include TD Bank, National Association, Bank of America, National Association, Citizens Bank, National Association, Mascoma Savings Bank, and Bar Harbor Bank & Trust.

#### 2016 Evaluation Period

During the 2016 evaluation period, LNB's NH\_AA1 included parts of the three counties of Grafton, Merrimack, and Sullivan, which are close to the Vermont boundary line. The AA includes 17 census tracts, which comprises seven upper-income CTs and ten middle-income CTs. There are no moderate- or low-income census tracts within the NH\_AA1. The 2010 U.S. Census Data indicates the Ledyard, NH\_AA1 has a population of 78,646. Additionally, 2010 Census Data reports that 4.6 percent of households are below poverty level. The median home value is \$272,142 and the median family income for nonMSA geographies within NH is \$66,238.

Demographic information for the Ledyard, NH\_AA1 for the 2016 evaluation period is detailed below:

Table A – Demographic Information of the Assessment Area						
Assessment Area: Ledyard_NH AA1 - 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	0.0	58.8	41.2	0.0
Population by Geography	78,646	0.0	0.0	58.6	41.4	0.0
Housing Units by Geography	37,890	0.0	0.0	61.2	38.8	0.0
Owner-Occupied Units by Geography	22,531	0.0	0.0	60.6	39.4	0.0
Occupied Rental Units by Geography	7,638	0.0	0.0	66.0	34.0	0.0
Vacant Units by Geography	7,721	0.0	0.0	58.5	41.5	0.0
Businesses by Geography	5,691	0.0	0.0	61.9	38.1	0.0
Farms by Geography	261	0.0	0.0	60.5	39.5	0.0
Family Distribution by Income Level	20,051	14.2	16.0	20.8	49.0	0.0
Household Distribution by Income Level	30,169	18.1	15.2	18.4	48.3	0.0
Median Family Income Non-MSAs - NH		\$66,238	Median Housi	ng Value		\$272,142
			Median Gross	Rent		\$973
			Families Belo	w Poverty Le	vel	4.6%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

#### 2017 Evaluation Period

During the 2017 evaluation period, the Bank's NH\_AA1 included parts of the three counties of Grafton, Merrimack, and Sullivan, which are in close proximity to the VT boundary line. The AA includes 17 census tracts, which comprises seven upper-income CTs and ten middleincome CTs. There are no moderate- or low-income tracts within the NH\_AA1. The 2015 ACS indicates the Ledyard NH\_AA1 has a population of 79,933 during 2017. ACS data also reports that 4.9 percent of households are below poverty level. The median home value is \$259,007 and the median family income is \$71,699.

Demographic information for the Ledyard, NH\_AA1 for the 2017 evaluation period is detailed in the following table:

Table A – Demographic Information of the Assessment Area						
Assess	ment Area:	: Ledyard_I	NH AA1 – 201	7		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	0.0	58.8	41.2	0.0
Population by Geography	79,933	0.0	0.0	59.0	41.0	0.0
Housing Units by Geography	39,930	0.0	0.0	63.2	36.8	0.0
Owner-Occupied Units by Geography	22,724	0.0	0.0	63.7	36.3	0.0
Occupied Rental Units by Geography	8,749	0.0	0.0	61.2	38.8	0.0
Vacant Units by Geography	8,457	0.0	0.0	64.0	36.0	0.0
Businesses by Geography	5,657	0.0	0.0	55.5	44.5	0.0
Farms by Geography	269	0.0	0.0	62.5	37.5	0.0
Family Distribution by Income Level	20,411	15.4	16.2	21.3	47.1	0.0
Household Distribution by Income Level	31,473	18.4	15.4	18.2	48.0	0.0
Median Family Income Non-MSAs - NH		\$71,699	Median Housi	ng Value		\$259,007
			Median Gross	Rent	· · · · · · · · · · · · · · · · · · ·	\$1,049
			Families Belo	w Poverty Le	vel	4.9%

Source: 2010 U.S. Census & 2015 ACS Census and 2017 D&B Data
Due to rounding, totals may not equal 100.0
(\*) The NA category consists of geographies that have not been assigned an income classification.

### **Description of Vermont Assessment Area**

The Bank has one branch location within Vermont. The Norwich, VT branch operates as a full-service branch and is the main office. The branch is open 9:00 AM to 5:00 PM Monday through Friday, and 9:00 AM to 12:00 PM on Saturdays. The branch is closed on Sundays. The drive through service window is open 8:00 AM to 5:00 PM Monday through Friday and 9:00 AM to 12:00 PM on Saturdays, however, the ATM located at the branch is available 24 hours a day.

The VT AA includes towns in in the contiguous Orange and Windsor counties. The VT\_AA2 includes 11 census tracts, all of which are middle- or upper-income. There are seven middle-income tracts and four upper-income tracts in 2017. The AA does not arbitrarily exclude any low- or moderate-income areas.

Market competition within the VT\_AA2 is high, with ten other banks in the AA. LNB faces heavy competition from large national banks and other local institutions, such as Mascoma Savings Bank, People's United Bank, Bar Harbor Bank & Trust, and TD Bank. The FDIC Market Share Report as of June 30, 2017 indicates that Ledyard maintained 19 percent of its deposits in the VT branch, totaling \$76.3 million. The Bank ranks eighth with deposit market share of 5.2 percent in the AA. A year prior, in June 2016, the Bank had a deposit market share of 5.3 percent within the VT AA2.

As of May 2018, Moody's Analytics notes Vermont's economy is growing slowly due to a tight labor market. While unemployment is low, job growth and population growth remain relatively stagnant. There are few high paying positions available, limiting in-migration and home sales. Tourism and healthcare remain two of the largest forces driving the state's economy. One in five people within the labor market are employed within the education and health services sector, which are higher paying sectors. This is largely due to the universities and colleges within the state, as well as the high percentage of insured people and aging population who require more medical visits. Government and retail jobs also take up a significant portion of employment and income. Government jobs primarily include local government positions, which have lower pay than state and federal government positions. The economy is expected to improve slightly over the next several years, but will not grow at the same pace as the US.

According to the Lebanon Area Chamber of Commerce, major employers in the Upper Valley area include the Dartmouth-Hitchcock Medical Center, Dartmouth College, Timken Aerospace, and Alice Peck Day Memorial Hospital.

For 2016, the median housing price in the VT\_AA2 is approximately \$259,165. For 2017, the median housing price in the VT\_AA2 is approximately \$255,185. We were able to determine housing prices of the towns in the assessment area by weighting the median housing prices in each town via Zillow (as of October 2018) by the population of those towns (via 2010 census information). The average median housing price in Vermont in October 2018 is \$201,400 (Zillow). The median housing prices in the AA remain relatively high in comparison to the median family income. The relatively expensive housing market limits the affordability of housing for low-and moderate-income families in the AA.

The charts below depict demographic information of the VT\_AA2 for 2016 and 2017, respectively:

Table A - Demographic Information of the Assessment Area						
Assess	ment Area:	: Ledyard_`	VT AA2 – 201	6		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	0.0	72.7	27.3	0.0
Population by Geography	34,463	0.0	0.0	71.4	28.6	0.0
Housing Units by Geography	18,769	0.0	0.0	73.8	26.2	0.0
Owner-Occupied Units by Geography	10,563	0.0	0.0	69.0	31.0	0.0
Occupied Rental Units by Geography	4,471	0.0	0.0	79.5	20.5	0.0
Vacant Units by Geography	3,735	0.0	0.0	80.6	19.4	0.0
Businesses by Geography	2,772	0.0	0.0	66.0	34.0	0.0
Farms by Geography	160	0.0	0.0	65.0	35.0	0.0
Family Distribution by Income Level	9,478	15.1	16.6	20.4	47.9	0.0
Household Distribution by Income Level	15,034	20.6	13.2	17.9	48.3	0.0
Median Family Income Non-MSAs - VT		\$60,519	Median Housi	ng Value		\$259,165
			Median Gross	Rent	······	\$908
			Families Belo	w Poverty Le	vel	5.6%

Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0
(\*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Dem	ographic II	ıformation	of the Assessn	nent Area		
Assessment Area: Ledyard_VT AA2 - 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	0.0	54.5	45.5	0.0
Population by Geography	34,094	0.0	0.0	56.1	43,9	0.0
Housing Units by Geography	19,064	0.0	0.0	53.3	46.7	0.0
Owner-Occupied Units by Geography	10,749	0.0	0.0	54.3	45.7	0.0
Occupied Rental Units by Geography	4,266	0.0	0.0	60.9	39.1	0.0
Vacant Units by Geography	4,049	0.0	0.0	42.6	57.4	0.0
Businesses by Geography	2,720	0.0	0.0	52.6	47.4	0.0
Farms by Geography	166	0.0	0.0	54.8	45.2	0.0
Family Distribution by Income Level	9,324	14.2	13.9	21.5	50.4	0.0
Household Distribution by Income Level	15,015	20.7	13.6	17.1	48.6	0.0
Median Family Income Non-MSAs - VT		\$64,849	Median Housi	ng Value		\$255,185
			Median Gross	Rent		\$921
			Families Belov	w Poverty Le	vel	5.5%

Source: 2010 U.S. Census & 2015 ACS Census and 2017 D&B Data
Due to rounding, totals may not equal 100.0
(\*) The NA category consists of geographies that have not been assigned an income classification.

### Exhibit III

Branches Open & Closed

#### **Ledyard National Bank**

#### Offices Opened and Closed

Ledyard Financial Advisors opened a wealth management office in Concord, NH on May 16, 2017 (RSSD 5115422).

The Ledyard Financial Advisors office is located at 1 Pillsbury Street, Suite 303, Concord, NH; which is in Census Tract 0321.00, an upper income tract. Census Tract 0321.00 is adjacent to Tract 0322.00 which is a moderate income tract and the boundary between the tracts is at Allison Street, one block north of the Pillsbury Street location.

The Ledyard Financial Advisors office in Concord, NH does not provide retail banking or lending services. The services are limited to personal financial advisory and wealth management services which are primarily for affluent clients with substantial investable assets.

In 2017, Ledyard National Bank expended the New Hampshire Assessment Area to include all census tracts in the city of Concord, NH and has started extending credit to individuals and businesses in the Concord area. One mortgage loan originator works the Concord market one or two days a week.

In October 2020, Ledyard National Bank opened a new retail branch in Concord, New Hampshire. The new location is located at 74 South Main Street Concord, NH 03301. The new, full-service branch features an innovative design that removes the traditional barriers between clients and branch personnel.

### Exhibit IV

Branch Office Listing

#### Ledyard National Bank

#### **Branch Listing**

#### **Offices and Operating Hours:**

**Norwich:** 320 Main Street/PO Box 670 Norwich, VT 05055 802-649-2050

(CT-9650) Lobby Hours: 9:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-up Hours: 8:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Walk-Up ATM Open 24-hours

**Hanover:** 38 South Main Street/PO Box 799 Hanover, NH 03755 603-643-2244

(CT-9616.01 & 9616.02) Lobby Hours: 9:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-up Hours: 8:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Walk-Up ATM Open 24-hours

**Hanover:** 50 Lebanon Street Hanover, NH 03755 603-643-7457

(CT-9616.01 & 9616.02) Lobby Hours: 9:00-5:00 Daily, 9:00-12:00 Saturday

Drive-Up Hours: 8:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-Up ITM Open 24-hours

No Safe Deposit Boxes

**Lebanon:** 42 Old Etna Road Lebanon, NH 03766 603-448-2220

(CT-9617) Lobby Hours: 9:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-Up Hours: 8:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-Up ATM Open 24-hours

West Lebanon: 67 Main Street West Lebanon, NH 03784 603-298-9444

(CT-9618) Lobby Hours: 9:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-Up Hours: 8:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-Up ATM Open 24-hours

Lyme: 5 Main Street Lyme, NH 03768 603-795-2288

(CT-9609) Lobby Hours: 9:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Walk-Up ATM Open 24-hours

**Concord:** 74 South Main Street Concord, NH 03301 603-415-0877

(CT-321.00) Lobby Hours: 9:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Walk-Up ITM Open 24-hours

Concord LFA\*: 1 Pillsbury Street, Suite 303 Concord, NH 03301 603-513-4100

(CT-0321.00) Hours: 8:00 – 5:00

<sup>\*</sup>This is a limited service office which does not provide retail banking or lending services. The Ledyard Financial Advisors office provides personal financial advisory and wealth management services which are primarily for affluent clients with substantial investable assets.

**New London:** 178 County Road New London, NH 03257 603-526-7725

(CT-410) Lobby Hours: 9:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-Up Hours: 8:00 – 5:00 Daily, 9:00 – 12:00 Saturday

Drive-Up ATM Open 24-hours

Ledyard Financial Advisors, Commercial Loans:

Hours: 9:00 - 5:00 Weekdays

Hanover LFA\*: 2 Maple Street Hanover, NH 03755 603-643-0044

(CT-9616.01 & 9616.02) Hours: 8:00 – 5:00 Weekdays

Walk-Up ATM Open 8:00 – 5:00

\*This is a limited service office which does not provide retail banking or lending services. The Ledyard Financial Advisors office provides personal financial advisory and wealth management services which are primarily for affluent clients with substantial investable assets. The Private Banking Department is located at Maple Street and provides depository and lending services to higher net worth clients. Except for the ATM, there are no cash services available at the Maple Street office. The Infinnex Brokerage Office, a broker-dealer network arrangement offering non-deposit investment services, is also located at the Maple Street office.

# Exhibit V

Details of Services and Fees

# **Checking Accounts**

	Personal Checking	BIG GREEN Checking	Gold Checking	Platinum Checking
ATM/Check Card – Unlimited use	Yes	Yes	Yes	Yes
Free Online Banking	Yes	Yes	Yes	Yes
Free Online Bill Pay	Yes	Yes	Yes	Yes
Check Paid Fee/Withdrawal Charge	Yes	N/A	N/A	N/A
eWallet*	Yes	Yes	Yes	Yes
Features	ATM/Debit Card services**  \$4 monthly service charge and \$.25 service charge for each check over 20 if average daily balance falls below \$500  Monthly service charges are automatically waived for any one of the following:  An average daily balance of \$500  Clients 60 years of age and over  Platinum Checking Account clients  Clients who have a monthly direct deposit  Minimum \$10 to	Dartmouth Athletics branded Visa® ATM/Debit Card services**  Reimbursement of first 4 ATM fees per statement period up to \$20  Electronic Statements required  \$5 Monthly Service Charge per statement cycle  Monthly charge is automatically waived for any one of the following:  Students who are 23 years of age and younger  Seniors who are 70 years of age and older  Clients who have a monthly direct	ATM/Debit Card services**  Reimbursement of first 4 ATM fees per statement period up to \$20  Electronic Statements required  \$5 Monthly Service Charge per statement cycle  Monthly charge is automatically waived for any one of the following:  Students who are 23 years of age and younger  Seniors who are 70 years of age and older  Clients who have a monthly direct deposit  Minimum \$10 to	Exclusive Benefits, including special deposit rates, loan rates and reduced service fees  ATM/Debit Card services available**  \$20 monthly service charge  Monthly charge is automatically waived for one of the following:   \$20,000 in combined deposit account balances  Active Ledyard Financial Advisor Client  Free Cashier's Checks  Free "Safety paper" Checks OR 50% off other "personal-sized" checks  Reimbursement of 4

open account; deposit open account; ATM fees per month minimum balance minimum balance is charged by other Minimum \$10 to financial institutions is not required not required open account; for the use of non-Mobile Banking minimum balance is Mobile Banking and Ledyard ATMs and Mobile not required Mobile Deposits Deposits services services available Ledyard will not assess Mobile Banking and available its own fee for use of Mobile Deposits non-Ledyard ATMs services available No fees for ATM/debit card replacement, stop payments or incoming domestic wire transfers Waive transfer fee for OD LOC/Savings Account Mobile Banking and Mobile Deposits services available Complimentary review of investments by Ledyard Financial Advisors

# **Platinum Checking**

The ideal checking account for the Ledyard client with a banking relationship across multiple banking products. This checking account gives you access to all the best that Ledyard has to offer.







RECEIVE OUR BEST DEPOSIT & LOAN RATES MONTHLY FEE WAIVER
WITH QUALIFYING
DEPOSITS

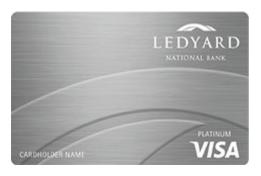
ATM FEE REFUNDS

#### **Account Highlights:**

- Exclusive Benefits, including: Special deposit rates, Reduced service fees
- \$20 Monthly Service Charge per statement cycle. Charge is automatically waived for \$20,000 in combined deposit account balances
- Receive our best deposit and loan rates
- Free Cashier's Checks
- Free "Safety paper" Checks OR 50% off other "personal sized" checks

- Reimbursement of 4 ATM fees per month charged by other financial institutions for the use of non-Ledyard ATMs
- Ledyard will not assess its own fee for use of non-Ledyard ATMs
- Complimentary review of investments by Ledyard Financial Advisors
- No fees for debit card replacement, stop payments, or incoming domestic wire transfers
- Waive transfer fee for OD LOC/Savings Account

Make everyday purchases the easy way with a Ledyard Bank Platinum Debit card



Personal and business banking relationships within the retail bank are subject to FDIC insurance coverage limits. Investment, tax and wealth management services offered by Ledyard Financial Advisors are not insured by the FDIC, are not deposits or other obligations of, or guaranteed by the Bank or any affiliate, and are subject to investment risk including the possible loss of principal amount invested.

# **Dartmouth Big Green Banking**

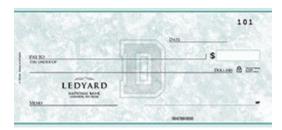
#### Dartmouth Pride Right in Your Wallet

Now you can show your Dartmouth pride wherever you go with Dartmouth Big Green Banking – right in your wallet! As the official bank of Dartmouth Athletics, Ledyard Bank is proud to offer tailored banking solutions for students, alumni and fans alike. With a suite of benefits and features, it's easy to root for the Big Green on campus and off.

#### Dartmouth Big Green Banking includes the following features and benefits:

- Mobile Banking & Mobile Deposits
- Online Banking & Online Bill Pay
- No charge assessed by Ledyard National Bank for withdrawals from ATMs not owned by Ledyard National Bank\*
- Reimbursement of the first 4 ATM fees per statement period assessed by the owner/operator for use of ATMs not owned by Ledyard National Bank with a maximum total reimbursement of \$20\*
- No monthly service charge\*
- Direct Deposit available, but not required
- Dartmouth Athletics branded Visa ATM/Debit Card

- Electronic Bank Statements required
- Minimum \$10 to open account; minimum balance is not required
- Free first order of branded Dartmouth checks



Select your unique Dartmouth Athletic card from 16 design options:



# **Savings Accounts**

	Statement Savings	Certificates of Deposit (Cds)	Personal Step-Up Money Market Account
Interest Paid	Yes	Yes	Yes
Balance required to earn interest	Yes	Yes	Yes
ATM/Check Card – Unlimited use	Yes	NA	No
Free Online	Yes	NA	Yes

Banking			
Free Online Bill Pay	Yes	NA	No
Check Paid Fee/Withdrawal Charge	Yes	NA	Yes
Features	<ul> <li>\$250         average         daily         balance to         earn interest</li> <li>Four         withdrawals         at no charge         per month -         \$.50 each         withdrawal         over four</li> <li>\$4.00         monthly         service         charge if         average         balance falls         below \$250</li> <li>Service         charges are         waived for         those 60         years and         older,         minors and         Platinum         Checking         Account         clients</li> <li>ATM         services are         available*</li> <li>FDIC         insured</li> </ul>	<ul> <li>Short and long-term investment options available</li> <li>Minimum investment \$500</li> <li>Interest compounded daily and credited monthly</li> <li>Preferred rates for those with a Ledyard checking account or Platinum Checking Account clients</li> <li>FDIC insured</li> </ul>	<ul> <li>Interest earned with a \$1,500 daily balance</li> <li>Interest earned may increase as your balance increases (see ledyardbank.com for rates)</li> <li>Unlimited inperson and ATM withdrawals; \$10.00 per item charge all other withdrawals exceeding six per statement cycle</li> <li>\$10.00 service charge if average monthly balance per statement cycle falls below \$1,500</li> <li>FDIC insured</li> </ul>

### INDIVIDUAL RETIREMENT ACCOUNTS (IRAS)

Individual Retirement Accounts are a convenient way to reduce taxable income and save for retirement.

- FDIC insured, Ledyard National Bank offers a variety of tax-deferred retirement plans to meet an individual's specific financial needs.
- IRAs require a small opening deposit of at least \$10.00.
- Substantial penalty for early withdrawal. Substantial tax penalties may apply for withdrawals before reaching the age of 59 1/2.
- Interest is compounded daily and paid monthly.
- Contributions may be tax deductible and supplement retirement income.\*\*
- To learn more, contact any of our branch representatives.

# CDARS (Certificate of Deposit Account Registry Service)...A safe, convenient solution for large-deposit investors.

Until now, there were only three ways an investor could enjoy full FDIC insurance on deposits larger than 250,000: open and maintain accounts with multiple banks, invest with one bank by transferring ownership and registering accounts in the names of family members or corporate affiliates, or work through a broker-dealer.

Through CDARS, we can now place large deposits into smaller-denomination CDs at multiple institutions. This service can offer you significant benefits:

- The safety of FDIC insurance for large deposits. Because funds are placed in FDIC-insured CDs that are issued by other financial institution Network members, your total deposits over \$250,000 can be eligible for full FDIC coverage. Now you can make bank CD investments up to \$1 million or more!
- CD interest. Rates may compare favorably with those of other high-quality, fixed-income investments.
- Interest-payment flexibility. You may choose to have interest paid monthly or at maturity.
- Management convenience. You can manage all of your CD investments through a single relationship.
- The security of working with a trusted, local source. Your transaction is managed by the people you know and trust here at Ledyard National Bank.

# Health Savings Accounts

A Health Savings Account (HSA) is a tax-advantaged account that enables you to contribute funds for many out-of-pocket medical expenses, from office visits to prescriptions. By saving money on a pre-tax basis, you'll have more to spend on both planned and unexpected healthcare needs.

#### **Our HSA Rates**

Ledyard Bank's competitive HSA interest rates mean the money you save will also grow.

#### **Qualified Medical Expenses\*\***

Your HSA funds can be used for dozens of medical expenses, including:

- Routine physical exams
- Dental care
- Lab fees
- Vision care

- Prescription drugs
- Mental health services
- Hearing aids
- Hospital services
- Nursing services
- Operations (excluding cosmetic surgery)

Click here for the Internal Revenue Service's complete list of HSA qualified medical expenses. HSA Tax Advantages







TAX-FREE CONTRIBUTIONS Your HSA contributions are not subject to federal or state income tax. TAX-FREE GAINS
The interest you earn on your HSA
contributions are never taxed, so you keep
100% of interest-earned funds for your
medical expenses.

TAX-FREE WITHDRAWALS
The funds you withdraw from
your HSA for medical expenses
are never taxed.

\*\*Qualified medical expenses as described in detail in Section 213(d) of the Internal Revenue Service Tax Code (viewable at www.irs.gov); and have not been compensated or reimbursed by insurance or otherwise. You must be enrolled in a High Deductible Health Plan. (Check with your Benefits area to make sure your plan qualifies.)

# **Consumer Loans**

Ledyard offers a variety of personal loan products designed to get you the money you need. All decisions are made locally, which also means a timely response.

- Personal Loans
- Personal Lines of Credit
- Collateral Loans
- Auto Loans
- Overdraft Protection

# **Mortgages**

The Ledyard mortgage process is well defined and our clients can expect the following:

- We are committed to finding the best solutions for our clients and exhaust all efforts to match each client with the right products for his or her needs. In order to do so, we listen to our clients carefully
- We proactively communicate with our clients to ensure the service experience is beyond their expectations
- We are a knowledge provider to our clients and educate them throughout the loan process

#### Mortgages & Home Equity Loans

Whether you're building, buying new or looking to renovate, when it comes to residential mortgages and home equity loans, Ledyard has the experience and resources to help you reach your dreams responsibly.

Contact Neal Meagher at 603-790-1776 or Edward Bidlack at 603-526-5606 or email us at **mortgages@ledyardbank.com** for information on our comprehensive mortgage products. Our depth of experience and attention to our clients' needs will facilitate the lending process. See rates.

- Residential Mortgages
- Fixed or Adjustable Rates
- Jumbo Mortgages
- Second Mortgages
- Home Improvement Loans
- PrimeLine Home Equity Line of Credit
- Manufactured Home Loans
- Land Loans
- Construction Loans
- Vacation Home Loans
- Federal Housing Administration Loans
- Department of Veterans Affairs Loans
- USDA Rural Development Loans

### PRIMEline Home Equity Line of Credit

Your PRIMEline account is the best way to take advantage of the equity in your home for bill consolidation, a new car, home remodeling costs, tuition... you name it. For details, call or stop by any Ledyard office. See rates.

- APR is adjustable monthly to the Wall Street Journal Prime Rate with a floor rate of 3.50%.
- Lines up to \$250,000 (higher amounts available)
- Revolving equity credit line, easy checkbook access

Your interest may be tax deductible; consult your tax advisor to be sure

#### Perfect 10 Home Equity Loan

Your Perfect 10 account is another great way to take advantage of the equity in your home, and with a fixed rate over 10 years. For details, call or stop by any Ledyard office. See rates.

- Low, fixed rate stays fixed for the entire 10-year loan term
- Loan amounts available starting at \$10,000.
- Interest may be tax deductible (consult your tax advisor)

# **Private Banking**

Ledyard Private Banking, a division of Ledyard National Bank, delivers tailored banking and financial solutions that are customized to each client's unique needs. We bring a higher level of personal and consultative service to professionals, their practices and their families.

Private Banking clients work with a Private Banker who manages many, if not all aspects of their professional and personal financial lives. This is particularly beneficial, as professional growth is often accompanied by increased levels of financial responsibility. From coordinating a client's personal banking and investment strategies to providing the financial tools and guidance to manage the business needs of a professional practice, we deliver the ideal combination of products and services best suited to the situation.

We invite you to explore our capabilities and discover the difference a Ledyard Private Banking relationship can make in your professional and personal life.

# Wealth Management

Ledyard Financial Advisors is the premier asset management firm providing integrated investment, tax, banking and wealth management services to affluent individuals, families and institutions throughout the Upper Valley, Lake Sunapee and Concord Regions. In addition to our strong local presence and commitment to community, we are proud to serve clients across 37 states and 7 foreign countries.

# Mobile & App Banking

It's like having Ledyard National Bank in your pocket, 24 hours a day, 7 days a week.

Ledyard offers a solution that is easy to use, fast and secure for your banking needs on the go. Our Mobile and App Banking services allow you to:

- Check your account balances
- Receive alerts when your balance gets low 24/7
- Make a transfer
- And more!

If you are currently enrolled in online banking, it's easy to activate the Ledyard Mobile App. Simply download the app onto your device, and log-in using your current ID and password. If you are not currently enrolled in online banking, you can enroll now on our homepage. After you enroll and download the app, follow the directions provided on the login screen to access your accounts on the mobile app for the first time.

## **CardValet**

Introducing CardValet®, the app on your phone that helps protect the cards in your wallet. With CardValet® you get to decide how your card is used and if there's anything suspicious, you can be notified the moment it happens.







PROTECT YOURSELF Get mobile alerts whenever your card is used TRACK CARD USE Get review card usage history and transaction details SET LIMITS
Set customized purchase controls to help manage spending

#### App Highlights:

- Receive alerts based on location, merchant type, transaction type and purchase amount
- Turn your cards on and off instantly
- Disable lost or stolen cards and help prevent fraudulent activity
- Customize your card controls and you can restrict purchases to your GPS location
- Limit purchases to specific merchant categories, such as restaurants and grocery stores
- Approve transactions made in store online or at the ATM, even limit the purchase amount
- Controlling and monitoring spending

# uChoose Rewards

When it comes to rewards programs, the toughest part should be choosing from lots of options. That's why uChoose Rewards® gives you the flexibility to redeem points for travel, gas, groceries, gift cards to hundreds of merchants and more.





SHOP EARN ENJOY

#### **GETTING STARTED**

uChoose Rewards® is a rewards program that earns you points every time you use your Ledyard Bank debit card. You can also earn additional points for shopping at participating retailers with your card. Redeem your points for the reward of your choice from a vast online catalog.

**To set up your account**, visit <u>uChooseRewards.com</u> and click the Register button. Follow the prompts to create your user ID and password.

#### ALL ABOUT POINTS

Earn points every time you use your debit card and earn additional points for shopping at participating retailers, both in-store or online through <u>uChooseRewards.com</u>.

- Use your Ledyard Bank debit card to earn one point per \$1 spent, wherever you shop! Redeem points for the rewards you want most — the choices are endless!
- We'll keep track of your points for you. Just register at <u>uChooseRewards.com</u> and check your points balance on the homepage.
- You can redeem your points for any of our millions of options, like merchandise, travel experiences and activities, events tickets, merchant gift cards and more.
- All cards attached to an account automatically earn points together. Additionally, if you have multiple debit cards with Ledyard Bank, you can link them together to earn rewards faster. Just go to your profile page after you log in at <u>uChooseRewards.com</u> and click on Learn how.
- You can boost your points and earn up to 10 points per \$1 spent with special offers from featured merchants. Visit <u>uChooseRewards.com</u> for the latest offers and a full list of participating retailers, including restaurants, auto repair shops, clothing stores and online retailers.

Visit uChooseRewards.com today and register to start earning points!

# **Other Services**

#### Personal Financial Management – Ledyard Link

Now it is easier than ever to manage your personal finances, with the help of Ledyard Link from Ledyard National Bank. Over the years, Ledyard has consistently delivered products and services to establish meaningful long-term partnerships with our clients. That's what Plan Well Live Well is all about. A key to planning well is an understanding of how each piece of your personal financial picture interacts with the whole.

With Ledyard Link you can view all your accounts such as checking, savings, credit cards, 401ks, mortgages and investments from over 11,000 institutions. It gives you a consolidated view of all your finances and the power to easily manage and track your accounts – all on one website. From a financial planning standpoint, it even provides users with the ability to categorize, track and forecast expenses.

#### Available Accounts

Transfers may be made from or to Ledyard National Bank checking or savings accounts, but not loans or certificates of deposit (CDs).

Transfers also may be made to or from checking accounts at other FIs, and possibly savings accounts. Subscribers will need to check with the other FI to ensure that Automated Clearing House (ACH) transactions are allowed to savings accounts, as some FIs do not allow this. Transfers to or from loans or CDs are not supported.

#### Fees

- Transfers out of Ledyard to other FIs \$3.00 per transfer
- Transfers from other FIs into Ledyard Free

#### **Transfer Amount Limits**

For transfers to or from accounts that you have verified that you own at another institution:

- -\$1,500 initial transaction limit
- -\$1,500 daily limit
- -\$5,000 limit for outstanding transfers at one time
- -5,000 monthly limit\*

### Eligibility

Clients using this service must have established account relationships with the Bank. Micro Deposits are limited to accounts at other financial institutions held in the client's name or where the client is an authorized signatory on the account.

The external account(s) must either be owned by the client, or be one on which they are an authorized signer. The external banking account must also be located in the United States (an ABA routing number is required for the service).

<sup>\*</sup>Monthly is defined as a rolling 30 days, not a calendar month.

This service is available for personal accounts only. Businesses wishing to set their accounts up for ACH services use a separate, more traditional ACH facility. Please contact us for more details.

#### Visa® Credit Cards

#### Consumer Credit Card

When you use your Ledyard National Bank Visa® Platinum card, you have a fast, easy, convenient and safe way to pay for all your purchases. Your card is accepted at millions of merchant locations worldwide and comes with great benefits:

- Reward points for travel and merchandise
- Customer service located in the U.S.
- Automatic and online payment options
- Fraud and zero liability protection
- Balance transfer feature
- Travel Benefits Travel Accident Insurance\* and Auto Rental Insurance\*\*

Visit any of our seven banking offices to apply for a card.

See the card application's Important Disclosures for current terms, rates and fees. Cards are issued by TCM Bank, N.A. pursuant to a license from Visa U.S.A., Inc.

- \* Travel Accident Insurance Coverage applies when the entire cost of the fare (less redeemable certificates, vouchers, or coupons) has been charged to the card. Your account must be in good standing. Restrictions to coverage may apply.
- \*\* Auto Rental Collision Damage Waiver To activate coverage, complete the entire rental transaction with your card and decline the collision damage waiver coverage if offered by the rental company. Restrictions apply if you have personal automobile insurance covering this theft or damage.

#### Standard Issuer Statement

This card is issued by TCM Bank, N.A. Subject to credit approval.

You will also earn rewards on your account with the Scorecard Rewards program. These points can be redeemed for:

- Airline tickets and discounts
- Quality merchandise
- Cruises
- Hotel and resort discounts
- Shopping awards
- Dining and entertainment awards

#### **Business Credit Card**

When you use your Ledyard National Bank Business Visa® card, you have a fast, easy, convenient and safe way to pay for all your purchases and keep track of expenses. This financial and cash management tool provides detailed monthly, quarterly or annual report options that provide consolidated spending information.

Your Business Visa® is accepted worldwide at millions of merchant locations. In addition to worldwide acceptance, you also have these benefits:

- Automatic and online payment options
- Individualized cards and spending limits
- Rewards Option You can choose to earn rewards on your Business account with the ScoreCard
  for business program. These points can be redeemed for free airline travel, hotel discounts, cruises, dining,
  shopping and much more.

Visit any of our seven banking offices to apply for a card.

See the card application's Important Disclosures for current terms, rates and fees. Cards are issued by TCM Bank, N.A. pursuant to a license from Visa U.S.A., Inc.

### Lost or Stolen Ledyard National Bank Credit Card

To report a lost or stolen credit card, please call:

1-800-883-0131

Outside U.S. 1-727-570-4881

#### **ATM Cards**

With any personal account at Ledyard National Bank, you may apply for a Ledyard ATM Card. Our ATMs are open 24 hours a day. You may use your card to make cash withdrawals, deposits, transfers, or loan payments. We have ATMs at the following locations:

- Main Street, Hanover
- Corner of Park & Lebanon Streets, Hanover
- Collis Center, Dartmouth College
- Main Street, Norwich
- On the Green, Lyme
- Drive-up ATM, West Lebanon
- County Road, New London
- Route 120 at Old Etna Road, Lebanon
- Online Application

### Travel & Foreign Currency

Travelex is the world's largest retail foreign exchange specialist, with over 700 branded retail stores, principally in airports and tourist locations. The business sells banknotes and other foreign exchange and travel related products and services to individuals traveling for business and leisure purposes. **Click here** to check exchange rates or purchase currency.

# **Business Banking**

# **Checking**

Let our knowledgeable bankers help you find the checking account that best meets your business needs.

#### SMALL BUSINESS CONNECTION ACCOUNT\*

Relationship banking that rewards you for all the business you do with Ledyard. It's a non-interest bearing checking account that is perfect for businesses with low monthly transaction activity.

#### **BUSINESS CHECKING\***

Our account for businesses with more activity and, perhaps, larger average balances. A monthly earnings credit (based on the prevailing T-Bill index) will be calculated and credited against charges due. This credit is used to offset charges for the month, and not paid as interest.

#### **BUSINESS NOW ACCOUNT\***

This account is for sole proprietorships, non-profits and charitable organizations only. Interest is earned on the entire balance as long as an average daily balance of \$750 is maintained.

	Business Checking	Small Business Checking	Business NOW Account
Minimum Balance	No	No	Daily average balance of \$750
Monthly Maintenance Fee	\$5.00	No	\$5.00
Deposit Fee	\$0.50 per deposit	First 5 deposits free (\$0.50 each thereafter)	\$0.50 per deposit
Items Deposited Fee	\$0.10 for each non-LNB item deposited	No	\$0.10 for each non-LNB item deposited

Check Paid Fee/Withdrawal Charge	\$0.20 per check paid	First 30 checks free (\$0.20 each thereafter)	\$0.20 per check paid
Interest Paid	No	No	Yes: Provided daily average balance is \$750 or higher
Earning Credit	Yes: Calculated monthly based on average balance to offset account fees	No	No
Other			Offering is limited to sole proprietors, not-for-profit entities and municipalities

# **Savings**

Planning well means saving and investing for the future of your business. Ledyard offers a variety of ways to help you do that.

#### **BUSINESS STATEMENT SAVINGS ACCOUNT**

Because we tier our interest rates, the interest earned in your savings account may increase as your balance increases. Interest is earned on the entire balance as long as a \$500 average daily balance is maintained.

#### BUSINESS STEP-UP MONEY MARKET ACCOUNT

Because we tier our interest rates, the interest earned in your Money Market account may increase as your balance increases. Federal regulations limit the number of third-party withdrawals to six per statement cycle. Three of these may be by check.

	Business Savings Account	Business Step-Up Money Market Account
Minimum Balance	\$500 average daily balance to earn interest	\$1,500 required to open account
Monthly Maintenance Fee	No	\$10.00 if average monthly balance per statement cycle falls below \$1,500

Deposit Fee	No	No
Items Deposited Fee	No	No
Check Paid Fee/Withdrawal Charge	Four withdrawals per month at no charge - \$.50 for each withdrawal over four	Unlimited in-person and ATM withdrawals; \$10.00 per item charge for all other withdrawals exceeding six per statement cycle
Interest Paid	Yes	Yes - Five rate tiers defined by daily account balance
Earning Credit	No	No
Other	Federal regulations limit the number of third party withdrawals to six per statement cycle	Federal regulations limit the number of third party withdrawals to six per statement cycle

# **Merchant Credit Card Services**

Ledyard National Bank provides a variety of authorization and data capture options so that business owners can customize their credit card acceptance program to meet their goals and expectations. We offer a variety of programs for small and mid-size retailers, restaurants, and hotel and lodging establishments.

Ledyard's programs are offered through an alliance with BluePay, a premier credit card and merchant processing services company. A few of the many benefits you will enjoy include:

- Competitive processing rates
- No long term contract or hidden fees
- Exceptional Help Desk service available 24x7
- Mastercard, Visa, American Express and Discover acceptance
- New or refurbished point-of-sale equipment
- Internet and software solutions available
- Affordable gift card programs

# **Commercial Loans**

### **Business Lending**

With local decision-making, competitive rates and loans tailored to meet your specific needs; Ledyard's business team can help you get the money you need to keep your business growing.

#### Commercial Mortgages

With flexible terms and a full range of construction, permanent and interim-financing programs, Ledyard's mortgage loans can be customized to fit your needs and the needs of your business.

#### **Business Term Loans**

Term loans are also available if you need to finance the purchase of fixed assets such as machinery or equipment, finance business acquisitions or provide long-term working capital to support growth.

#### **Business Lines of Credit**

Seasonal cash flow needs or other short-term and ongoing financial needs.

#### Small Business Administration Loans

Ledyard offers a number of SBA loan products for growing businesses - everything from the purchase or renovation of real estate, to equipment purchasing, financing inventory, working capital and more. As an active member of the Small Business Administration's Preferred Lender Program (PLP) we're able to initiate and close loans quickly.

#### **Business Letters of Credit**

Ledyard offers Standby Letters of Credit and Documentary Letters of Credit. A Standby Letter of Credit provides assurance or backs performance of an obligation. It is often used to back-up payment of invoices, rent, promissory notes, real estate construction and bid performance. A Documentary Letter of Credit is issued to cover the shipment of goods either internationally or domestically.

#### **Business Credit Cards**

Whether you need immediate purchasing power or a more efficient way to manage expenses, a Ledyard business credit card gives you and your employees the ability to buy what you need when you need it - and to keep track of it all.

# **Cash Management**

Ledyard can help make your money work harder for your business. Use our cash management services to speed up collection times and eliminate time-consuming manual procedures.

### Online Banking

Now, you can manage your business banking whenever and wherever it's convenient for you. Ledyard offers online banking options, which include cash management services.

- View summary of all financial accounts
- View check images
- Obtain account history
- Make transfers between accounts
- Stop payment
- Pay bills
- Initiate ACH transactions and wire transfers
- Multiple users with unique passwords

#### Business Online Bill Pay

Today, businesses want it all. That means true control of your finances, total convenience and customization to do things your way.

Ledyard's Business Online Bill Pay lets you control what is paid, how much is paid and when it's paid. Making payments more quickly and easily with greater control over cashflow is just the beginning. You can access the bill pay feature from anywhere and at any time. You can even run audit reports, track your company's spending and reduce paperwork.

There's no better way to pay bills and invoices!

Please contact your relationship manager for details.

### Remote Deposit Capture (eBiz Deposit)

A convenient, time-saving remote deposit solution allowing you to make non-cash deposits anytime, right from your office.

### **Investment Sweep Account**

Make the most of your daily operating funds by sweeping excess cash automatically from one/multiple accounts into an investment account.

#### Zero Balance Account

For companies with multiple office locations, independent operating accounts are kept at zero, while available cash is concentrated into a single master account for investment or debt reduction.

# **Other Services**

#### Other Business Products & Services

Certificates of Deposit

- Individual Retirement Accounts
- Simplified Employee Pension Plans (SEPs)
- Night Deposit
- Wire Transfers
- Direct Deposit
- Business Debit Card
- Business Credit Card
- Foreign Exchange
- Mobile Banking
- Referral Services
- eBizDEPOSIT (Remote Deposit)
- Health Savings Accounts Employers (HSA Bank)

### Investment, Tax and Wealth Management Services\*

Looking for solutions to help you meet the long-term financial goals for you or your business? Ledyard can help with financial planning for retirement, investment management, estate planning and more. **Ledyard Financial Advisors** offers a full range of financial guidance and investment services right where you do your banking.

\* Personal and business banking relationships within the retail bank are subject to FDIC insurance coverage limits. Investment, tax and wealth management services offered by Ledyard Financial Advisors are not insured by the FDIC, are not deposits or other obligations of, or guaranteed by the Bank or any affiliate, and are subject to investment risk including the possible loss of principal amount invested.

### Travel & Foreign Currency

Travelex is the world's largest retail foreign exchange specialist, with over 700 branded retail stores, principally in airports and tourist locations. The business sells banknotes and other foreign exchange and travel related products and services to individuals traveling for business and leisure purposes. **Click here** to check exchange rates or purchase currency.

#### Visa® Reward Card

The perfect rewards solution for your business! The DeluxeCard® Visa® Reward Card is a smart, secure solution that can be used anywhere Visa debit cards are accepted.



### **Schedule of Fees & Charges**

- 1::/		4
Debit/ATM Card	Withdrawal Service Charge (Usage Non-Ledyard ATM)	\$1.00
Debit/ATM Card	Lost Card Replacement Fee per card	\$5.00
Debit/ATM Card	Expedited Shipping Fee per card	\$50.00
Debit/ATM Card	International Fees - percent of transaction amount	1%
Overdraft Funds Charge	Paid Item	\$29.00
Overdraft Funds Charge	Returned Item	\$29.00
= ::	rdrafts created by check, in-person withdrawal, ACH, bill payment, ic means, or other payment methods.	
Returned Item Charge	per returned item	\$10.00
Overdraft Protection Transfer Fee	per transfer	\$3.00
Telephone Transfers	per transfer	\$3.00
Interbank (external) Transfers	Outgoing (per transfer)	\$3.00
Interbank (external) Transfers	Incoming	no charge
Wire Transfers	Incoming Domestic	\$5.00
Wire Transfers	Incoming Foreign	\$10.00
		\$10.00
(Intermediary banks may charge a	· · · · · · · · · · · · · · · · · · ·	\$20.00
Wire Transfers	Outgoing Domestic	\$20.00
Wire Transfers	Outgoing Foreign (USD)	\$75.00
Wire Transfers	Outgoing Foreign (Non-USD)	\$55.00
Cashier's Check	per item	\$5.00
Certified Check	per item	\$20.00
Temporary Checks	per sheet / 4 checks per sheet	\$2.00
Foreign Currency	per order	\$15.00
Foreign Draft	per item	\$25.00
Account Reconciliation		\$25.00
Bond/Coupon Collection		varies
Coin/Currency Exchange		5%, \$3.00 minumum
Domestic Collections	per request	\$20.00
Foreign (Int'l) Collections	per request	varies
Statement Print	per statement	\$5.00
Statement Copies	per statement	\$5.00
Stop Payment Order	per item	\$20.00
Check Printing Charge		varies
FAX service	per page	\$5.00
Night Deposit Bags (first bag free)		\$15.00
Research	per hour	\$25.00
Writs/Levies/Attachments	per request	\$50.00
Safe Deposit Boxes	Contents of safe deposit boxes are not insured	
<u> </u>	Box Size - Annual Rental Fee	
	3X5	\$45.00
	3X10	\$55.00
	5X5	\$65.00
	5X10	\$95.00
	10X10	\$95.00 \$145.00
Safe Deposit Box Key Replacement	IOVIO	\$145.00
		·
Safe Deposit Box Drilling Fee (per box)		\$300.00

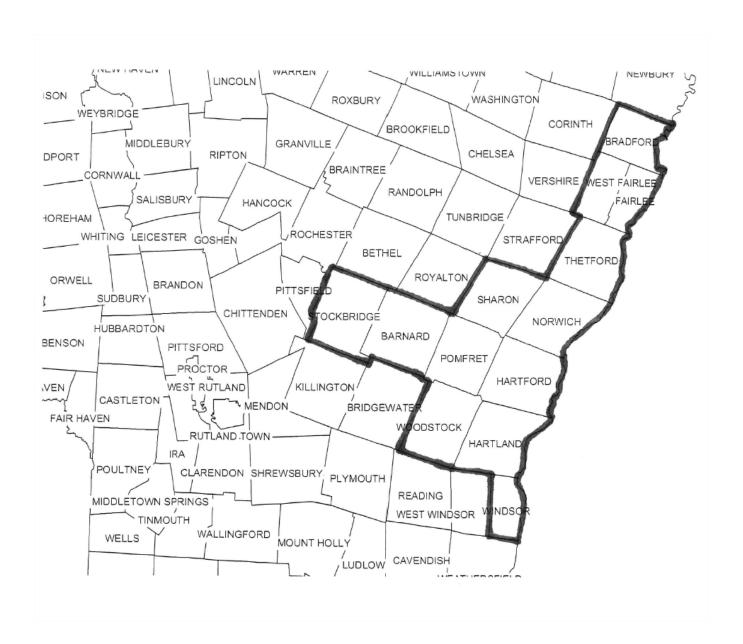
### Exhibit VI

CRA Assessment Area List & Maps

# New Hampshire Assesment Area



# Vermont Assesment Area



		Ledyard	Nationa	l Bank - N	lew Hampshire Assessment Area						2019 Est. Median
Census		State	County	Tract	NH non-MSA MFI = \$80,600			Income	2017 (	Owner Occ	Family
Tract		Code	Code	Code	Census Tract Includes Towns:	Town		Level	Population	Units	Income
11444		,,,,,,,			11441114	2500		LCYCI	Longitudii	Omis	meome
9607	1	33	9	9607.00	Orford, Wentworth, & Plermont	Orford		Middle	3,220	1,056	89,703
9609	2	33	9	9609.00	Lyme, Dorchester, Groton, & Hebron	Lyme		Upper	3,290	1,145	105,509
9613	3	33	9	9613.00	Grafton, Orange, & Alexandria	Grafton		Middle	3,378	1,100	71,180
9614	4	33	9	9614.00	Canaan	Canaan		Middle	3,898	1,140	71,604
9615	5	33	9	9615.00	Enfield	Enfield		Middle	4,557	1,435	89,833
9616	6	33	9	9616.01	Hanover - East of Grasse Rd/N of Reservoir Rd.	Hanover		Upper	2,988	898	147,068
9616	7	33	9	9616.02	Hanover - Downtown area	Hanover		Upper	8,360	844	178,418
9617	8	33	9	9617.00	Lebanon - North of Rte 4 (mostly)	Lebanon		Middle	7,405	1,574	75,162
9618	9	33	.9	9618.00	Lebanon - South of Rte 4 (w/ exception)	Lebanon		Upper	6,130	1,616	101,192
9751	10	33	19	9751.00	Plainfield & Cornish	Plainfield		Upper	4,046	1,355	100,719
9752	11	33	19	9752.00	Grantham, Croydon, & Springfield	Grantham		Middle	5,004	1,693	97,904
9753	12	33	19	9753.00	Sunapee	Sunapee		Upper	3,369	1,089	114,828
9754	13	33	19	9754.00	Newport	Newport		Middle	6,408	1,732	68,642
405	14	33	13	0405.00	Bradford, Newbury, & Sutton	Bradford		Middle	5,566	2,026	92,037
410	15	33	13	0410.00	New London	New London		Upper	4,579	1,310	112,477
415	16	33	13	0415.00	Danbury, Hill, & Wilmot	Wilmot		Middle	3,843	1,340	79,699
425	17	33	13	0425.00	Andover & Sallsbury	Andover		Middle	3,892	1,371	92,885
									-,		,
321	18	33	13	0321.00	Concord - South of Clinton St	Concord		Upper	3,868	1,045	112,029
322	19	33	13	0322,00	Concord - South of Downtown	Concord	S.Spring to MR & Fayette St to Allison or West St.	Moderate	3,095	402	61,584
323	20	33	13	0323.00	Concord - Downtown Main St, area	Concord		Middle	1,596	202	79,886
324	21	33	13	0324.00	Concord - Centre St. & North	Concord		Middle	3,504	574	81,021
325	22	33	13	0325.00	Concord - Southwest section	Concord		Upper	3,812	888	143,543
326	23	33	13	0326.00	Concord - Rte 3 / Long Pond area	Concord		Middle	3,622	617	71,718
327.01	24	33	13	0327.01	Concord - Northwest section	Concord		Middle	1,787	584	90,609
327.06	25	33	13	0327.06	Concord - Penhacook East of Rte 3	Concord		Middle	4,058	1,089	81,445
328	26	33	13	0328.00	Concord - Northeast section	Concord		Upper	4,975	1,571	128,740
329	27	33	13	0329.00	Concord - Heights section	Concord	N. side of Loudon Rd. from MR East	Middle	3,846	304	67,891
441	30	33	13	0441.00	Concord (Southeast section)	Concord	South side Loudon Rd, MR to Pembroke town line	Moderate	3,773	1,056	54,835
443	31	33	13	0443.00	Concord (West side Dist. 5 Rd to Broad Cove Dr.)	Concord		Middle	4,601	1,163	86,406
385	28	33	13	0385.00	Warner & Webster	Warner & Webst	er	Middle	4,643	1,478	88,471
390	29	33	13	0390.00	Hopkinton	Hopkinton		Upper	5,602	1,793	112,616
400	32	33	13	0400.00	Henniker	Henniker		Middle	4,849	1,190	82,004
310,01	33	33	13	0310.01	Bow (East of Bow Center Rd.)	Bow		Upper	3,780	1,209	132,265
310.02	34	33	13	0310.02	Bow (West of Bow Center Rd.)	Bow		Upper	3,865	1,220	125,835
									145,209		

NH	
7 Upper	41%
10 Middle	59%
17	
6 Upper	35%
9 Middle	53%
2 Moderate	12%
17	
13 Upper	38%
19 Middle	56%
2 Moderate	6%
34	

Ledvard	National	Bank -	Vermont	Assessment	Area
Louyara	Marional	Dunk	V CITITOILE	Maacaai ileii t	M, Ca

		Ledyard	l Nationa	l Bank - V	/ermont Assessment Area					2019 Est. Median
Census		State	County	Tract	VT non-MSA MFI = \$71,900		Income	2017	Owner Occ	Family
Tract		<u>Code</u>	Code	<u>Code</u>	Census Tract Includes Towns:	Town	Level	Population	Units	Income
9596	1	50	17	9596.00	Thetford	Thetford	Upper	2,606	993	117,532
9597	2	50	17	9597.00	Fairlee, & West Fairlee	Fairlee	Middle	1,769	547	78,377
9598	3	50	17	9598.00	Bradford	Bradford	Middle	2,771	822	75,109
9650	4	50	27	9650.00	Norwich	Norwich	Upper	3,393	1,069	142,762
9654	5	50	27	9654.00	Stockbridge, Barnard, Pomfret & Sharon	Sharon	Middle	3,836	1,435	88,004
9655	6	50	27	9655,01	Hartford (South side w/ Quechee)	Hartford	Upper	3,232	931	94,502
9655	7	50	27	9655.02	Hartford (North of River/Rte 14)	Hartford	Upper	2,714	838	89,034
9656	8	50	27	9656.00	Hartford (White River Jct. & Wilder)	Hartford	Middle	3,882	1,088	75,940
9657	9	50	27	9657.00	Hartland	Hartland	Middle	3,386	1,069	79,812
9658	10	50	27	9658.00	Woodstock	Woodstock	Upper	3,009	1,081	104,475
9660	11	50	27	9660.00	Windsor	Windsor	Middle	3,496	876	68,433
								34,094		
						Total In NH =		145,209	81%	
						Total in VT =		34,094	19%	
						Population of combined AA		179,303	100%	

1	<u>vr</u>	
	5 Upper	45%
	6 Middle	55%
	11.	

### Exhibit VII

Loan to Deposit Ratio Information

### Ledyard National Bank

### Loan to Deposit Ratio History

Quarter Ending	Ratio
December 2016	72.96
March 2017	73.69
<b>June 2017</b>	71.90
September 2017	70.41
December 2017	72.96
March 2018	73.03
<b>June 2018</b>	74.26
September 2018	73.75
December 2018	74.12
March 2019	76.83
<b>June 2019</b>	79.18
September 2019	76.56
December 2019	80.74
March 2020	82.02
<b>June 2020</b>	77.97
September 2020	65.70
December 2020	61.44
March 2021	60.38
June 2021	56.66