

PUBLIC DISCLOSURE

June 29, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Alden Credit Union
Certificate Number: 67951

710 Grattan Street
Chicopee, MA 01020

Division of Banks
One Federal Street, Suite 710
Boston, Massachusetts 02110

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the Division of Banks concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

INSTITUTION RATING	1
SCOPE OF EVALUATION	2
DESCRIPTION OF INSTITUTION	3
DESCRIPTION OF ASSESSMENT AREA	4
CONCLUSIONS ON PERFORMANCE CRITERIA.....	7
PERFORMANCE EVALUATION DISCLOSURE GUIDE	15
SMALL INSTITUTION PERFORMANCE CRITERIA	16
GLOSSARY	17

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Alden Credit Union (credit union)** prepared by the Massachusetts Division of Banks (Division), the institution's supervisory agency as of **June 29, 2026**. The Division rates the CRA performance of an institution consistent with the provisions set forth in Massachusetts Regulation 209 CMR 46.00.

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities. The credit union's performance is summarized below:

LENDING TEST:

- The loan-to-share ratio (LTS) is more than reasonable given the credit union's size, financial condition, and assessment area credit needs.
- The credit union made a substantial majority of its home mortgage and consumer loans in the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration of loans among individuals of different income levels.
- The credit union did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating. The credit union has an adequate record relative to its fair lending policies and procedures.

SCOPE OF EVALUATION

General Information

This evaluation considered activity from the previous evaluation dated February 28, 2022, to the current evaluation dated June 29, 2026. Examiners used the Interagency Small Institution CRA Examination Procedures to evaluate CRA performance. These procedures include the Lending Test.

The Lending Test considered the credit union's performance according to the following criteria:

- LTS ratio
- Assessment area concentration
- Geographic distribution
- Borrower profile
- Response to CRA-related complaints and fair lending policies and procedures

Activities Reviewed

Alden Credit Union's major product lines are home mortgage and consumer loans, considering the credit union's business strategy and the number and dollar volume of loans originated during the evaluation period. Home mortgage loans were weighted more heavily than consumer lending due to the availability of data.

Examiners reviewed home mortgage loans reported on the credit union's 2024 and 2025 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs). The credit union originated 78 HMDA-reportable loans totaling \$9.6 million in 2024 and 93 HMDA-reportable loans totaling \$17.5 million in 2025. Examiners compared credit union lending in 2024 and 2025 to aggregate HMDA data for the relevant year. Examiners also compared credit union lending to applicable demographic data.

This evaluation sampled consumer loan data for 2024 and 2025 to draw conclusions about consumer lending performance. Examiners sampled 25 loans for each year. Loan performance was compared to household demographic data as appropriate.

For the Lending Test, examiners reviewed the number and dollar volume of home mortgage and consumer loans. While the tables throughout this evaluation include both the number and dollar volume of loans, examiners emphasized credit union performance by number of loans, as the number of loans better indicates the number of individuals served.

DESCRIPTION OF INSTITUTION

Background

Alden Credit Union, originally chartered with the Division of Banks in 1939, is a member-owned community credit union. Alden Credit Union extends membership to all who live, work, or attend school in Hampden or Hampshire Counties, or the municipalities of East Brookfield, North Brookfield, Leicester, Spencer, or Worcester, and their family members. As of March 31, 2026, the credit union has 12,757 members.

The credit union is a low-income credit union, designated by the Division and the National Credit Union Administration (NCUA). A designated low-income credit union indicates that a majority of its membership earns less than 80 percent of the median family income for the metropolitan area where they live, or the national metropolitan area, whichever is greater.

The credit union received a “Satisfactory” rating at its previous Division of Banks CRA Performance Evaluation dated February 28, 2022, based on Interagency Small Institution CRA Examination Procedures and the Division’s CRA Regulation 209 CMR 46.00.

Operations

Alden Credit Union is headquartered at 710 Grattan Street in Chicopee, MA, and maintains one additional branch, located at 175 State Street in Belchertown, MA. Lobby hours are available from 9:00 AM – 5:00PM, Monday through Friday, and extended to 6:00 PM on Thursdays. Weekend hours are available on Saturdays, from 9:00 AM – 1:00 PM. Each branch is equipped with a drive-up teller window and 24-hour automated teller machine (ATM). No branches have opened or closed since the previous examination.

Alden Credit Union offers both personal banking products, business checking accounts, and merchant services for business members. Members can open checking and saving accounts; club, money market, and certificates of deposit (CDs); and Individual Retirement Accounts (IRAs). Available loan products include fixed- and variable-rate home mortgages; home equity loans and lines of credit; new and used car, boat, and motorcycle loans; and personal loans, credit cards, and student loans.

Members may access their accounts, transfer funds, pay bills, and apply for loans through the credit union’s online and mobile banking platforms. Additionally, through the credit union’s participation in both the SUM and MoneyPass ATM networks, members are able to conduct surcharge-free transactions at over 95,000 ATMs across the United States.

Ability and Capacity

As of the March 31, 2026, quarterly call report, Alden Credit Union’s assets totaled \$187.9 million, shares and deposits totaled approximately \$150.2 million, and the loan portfolio totals approximately \$144.9 million.

Residential mortgage lending accounts for a majority of Alden Credit Union's loan portfolio. Residential loans account for approximately 80.8 percent of all loans, and consumer loans make up 11.1 percent of the credit union's loan portfolio.

The following table provides information on Alden Credit Union's loan portfolio distribution.

Loan Portfolio Distribution as of 03/31/2026		
Loan Category	\$	%
Unsecured Credit Card Loans	300,246	0.2
Non-Federally Guaranteed Student Loans	0	0.0
All Other Unsecured Loans/Lines of Credit	42,691	0.0
New Vehicle Loans	1,086,454	0.8
Used Vehicle Loans	14,052,067	9.7
All Other Secured Non-Real Estate Loans/Lines of Credit	593,736	0.4
Consumer Loans	16,075,194	11.1
Loans/Lines of Credit Secured by a First Lien on a single 1-4 Family Residential	102,100,168	70.5
Loans/Lines of Credit Secured by a Junior Lien on a single 1-4 Family Residential	14,978,143	10.3
Other Real Estate Loans/Lines of Credit	0	0.0
Real Estate Loans	117,078,311	80.8
Commercial Loan/Real Estate Secured Line of Credit	11,040,475	7.6
Commercial Loan/Non-Real Estate Secured Line of Credit	663,379	0.5
Total Loans	144,857,359	100.0
<i>Source: Reports of Income and Condition</i>		

Examiners did not identify any financial, legal, or other impediments that affect the credit union's ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its performance will be evaluated. Alden Credit Union has designated a single contiguous assessment area encompassing Hampshire and Hampden Counties, which are within the Springfield Combined Statistical Area (CSA). The following sections discuss demographic and economic information for the assessment area.

Economic and Demographic Data

The assessment area contains 139 census tracts within Hampshire and Hampden Counties. These census tracts reflect the following income designations according to the 2020 US Census:

- 16 low-income tracts
- 27 moderate-income tracts
- 56 middle-income tracts
- 35 upper-income tracts
- And 5 census tracts without an income designation

The majority of low- and moderate-income tracts are located in Springfield and Holyoke, representing 79.1 percent of the 43 tracts with these income delineations. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	139	11.5	19.4	40.3	25.2	3.6
Population by Geography	628,133	8.5	19.7	40.5	28.3	3.0
Housing Units by Geography	257,827	8.6	20.5	42.7	27.9	0.3
Owner-Occupied Units by Geography	151,712	2.2	14.3	46.1	37.4	0.0
Occupied Rental Units by Geography	88,387	18.6	30.5	37.3	12.9	0.7
Vacant Units by Geography	17,728	13.9	23.6	40.3	21.2	1.1
Businesses by Geography	53,987	9.5	19.0	40.8	29.6	1.0
Farms by Geography	1,638	2.1	9.5	46.5	41.6	0.2
Family Distribution by Income Level	151,099	23.7	16.3	18.7	41.3	0.0
Household Distribution by Income Level	240,099	26.2	15.2	16.1	42.5	0.0
Median Family Income MSA - 11200 Amherst Town-Northampton, MA MSA		\$97,581	Median Housing Value			\$229,947
Median Family Income MSA - 44140 Springfield, MA MSA		\$74,547	Median Gross Rent			\$943
			Families Below Poverty Level			10.1%
Source: 2020 ACS, 2025 D&B Data, and FFIEC Estimated Median Family Income; (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area's lending trends reflect increasing housing prices. The 2020 Median housing value was \$229,947. The average credit extended for a purchase transaction in 2024 was \$310,166. The average credit extended for a purchase transaction increased in 2025, to approximately \$329,573. Higher prices may suggest a more difficult market for first-time homebuyers.

The Federal Financial Institutions Examination Council (FFIEC) updated median family income level is used to analyze home mortgage loans under the Borrower Profile criterion.

The low-, moderate-, middle- and upper-income categories are presented in the following table for each year during the review period:

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Amherst Town-Northampton, MA MSA Median Family Income (11200)				
2024 (\$119,700)	<\$59,850	\$59,850 to <\$95,760	\$95,760 to <\$143,640	≥\$143,640
2025 (\$119,000)	<\$59,500	\$59,500 to <\$95,200	\$95,200 to <\$142,800	≥\$142,800
Springfield, MA MSA Median Family Income (44140)				
2024 (\$89,100)	<\$44,550	\$44,550 to <\$71,280	\$71,280 to <\$106,920	≥\$106,920
2025 (\$96,200)	<\$48,100	\$48,100 to <\$76,960	\$76,960 to <\$115,440	≥\$115,440
<i>Source: FFIEC</i>				

Competition

The assessment area is in a moderately competitive market for deposits. The 32 depository institutions in the assessment area operated 204 branches. Of the 32 financial institutions in the assessment area that reported deposit market share, Alden Credit Union ranked 26th, with a 0.6 percent market share. Large banks represent nine of the top ten institutions, collectively holding 72.6 percent of the deposit market share.

There is a significant level of competition for mortgage loans within the credit union's assessment area. In 2025, 271 lenders originated or purchased 6,691 residential loans. Alden Credit Union ranked 59th, with a 0.2 percent market share. All three of the top-ranked lenders were noted to be non-depository mortgage companies, collectively accounting for 17.7 percent market share.

Community Contact

As part of the evaluation process, examiners contact third parties that are active within the assessment area to assist in identifying the credit and community development needs of the community. This information helps determine whether local financial institutions are responsive to those needs, and to identify what credit and community development opportunities are available.

Examiners contacted a non-profit community development corporation based in the credit union's assessment area. The organization provides access to affordable housing, nutritional necessities, and digital equity to low- and moderate-income individuals and families in Massachusetts. During the interview, the contact identified that the greatest needs within the community as food access, critical home repairs, and healthcare. While credit products useful to low-income populations are limited, the contact noted that smaller dollar forgivable loans with a shorter term (less than 15 years) have been successfully used by individuals with renovation needs. The contact indicated that a number of large financial institutions in the assessment area provided monetary support to the organization.

Credit Needs

Based on demographics and information from the community contact, affordable housing is a noted need in the assessment area. The community contact indicated a need for short-term, small dollar loans and home improvement financing options.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Alden Credit Union demonstrated Satisfactory performance under the Lending Test. The following sections summarize the credit union's performance under each criterion.

Loan-to-Share Ratio

This performance criterion determines what percentage of the credit union's share base is reinvested in the form of loans and evaluates its appropriateness. The average net loan-to-share (LTS) ratio is more than reasonable given the institution's size, financial condition, and membership needs.

The credit union's net LTS ratio, calculated using NCUA 5300 Quarterly Call Report data, averaged 93.5 percent over eight calendar quarters, from June 30, 2024, to March 31, 2026. Alden Credit Union's LTS ratio gradually fluctuated over the evaluation period, generally trending upward from 88.1 percent as of June 30, 2024, to 96.2 percent as of March 31, 2026. The increase in the LTS ratio is primarily attributed to outflows of deposits over the evaluation period, as a result of a shift in the credit union's business strategy. Alden Credit Union's LTS ratio was above three similarly situated institutions.

Please refer to the table below for a comparison of the credit union's loan-to-share ratio.

Loan-to-Share Ratio Comparison		
Institution	Total Assets as of 3/31/2026 (\$)	Average LTS Ratio (%)
Alden Credit Union	187,909,777	93.5
Arrha Credit Union	159,519,304	90.7
Holyoke Credit Union	299,394,814	77.2
Greater Springfield Credit Union	227,844,987	56.1
<i>Source: Reports of Income and Condition 6/30/2024 through 3/31/2026</i>		

Assessment Area Concentration

The credit union made a substantial majority of home mortgage loans by number and dollar volume within its assessment area in both 2024 and 2025. The following table illustrates the credit union's lending inside and outside its assessment area.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$(000s)	%	\$(000s)	%	
Home Mortgage										
2024	72	92.3	6	7.7	78	7,271	76.0	2,293	24.0	9,564
2025	87	93.5	6	6.5	93	14,571	83.3	2,922	16.7	17,493
Subtotal	159	93.0	12	7.0	171	21,842	80.7	5,215	19.3	27,057
Consumer										
2024	21	84.0	4	16.0	25	388	88.5	50	11.5	438
2025	24	96.0	1	4.0	25	425	98.5	6	1.5	432
Subtotal	45	90.0	5	10.0	50	813	93.4	57	6.6	870
Total	204	92.3	17	7.7	221	22,654	81.1	5,272,152.00	18.9	27,927
Source: Credit Union Data										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area, particularly to low-or moderate-income geographies in the assessment area. The credit union's performance in both home mortgage and consumer lending supports this conclusion. Examiners focused on the number and percentage of loans in low- and moderate-income census tracts.

Home Mortgage

The geographic distribution of home mortgage loans reflects adequate dispersion throughout the assessment area. The credit union originated no loans in low-income census tracts in 2024 or 2025.

The credit union's activity was above aggregate lending and the relevant demographic in moderate-income census tracts by several percentage points in 2024. The Credit Union's performance improved by three (3) loans in moderate-income tracts in 2025 and was consistently above the aggregate's lending percentage.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2024	2.2	4.5	0	0.0	0	0.0
2025	2.2	4.3	0	0.0	0	0.0
Moderate						
2024	14.3	18.3	16	22.2	1,508	20.7
2025	14.3	17.9	19	21.8	1,765	12.1
Middle						
2024	46.1	42.9	47	65.3	4,273	58.8
2025	46.1	44.2	53	60.9	9,296	63.8
Upper						
2024	37.4	34.2	9	12.5	1,489	20.5
2025	37.4	33.3	15	17.2	3,510	24.1
Not Available						
2024	0.0	0.1	0	0.0	0	0.0
2025	0.0	0.4	0	0.0	0	0.0
Total						
2024	100.0	100.0	72	100.0	7,271	100.0
2025	100.0	100.0	87	100.0	14,571	100.0
<i>Source: 2020 ACS; Credit Union Data, 2024 & 2025 HMDA Aggregate Data.</i>						

Consumer Lending

The credit union's sampled consumer lending reflects adequate geographic distribution. The credit union's activity in low-income tracts is below the demographic of households in the same areas for 2024. The 2025 sample included one additional loan originated in low-income census tracts, bringing the performance by percentage in line with the demographic of households in low-income areas.

The credit union's performance in moderate-income tracts is below that of the demographic of households in the same areas in both 2024 and 2025. The low volume of the sample significantly impacts the credit union's reflected performance by percentage which is why a decrease of only two loans from 2024 to 2025 results in a significant decrease in moderate-income census tracts by percentage.

Geographic Distribution of Consumer Loans					
Tract Income Level	% of Households	#	%	\$(000s)	%
Low					
2024	8.2	1	4.8	10	2.5
2025	8.2	2	8.3	36	8.4
Moderate					
2024	20.3	3	14.3	65	16.7
2025	20.3	1	4.2	18	4.3
Middle					
2024	42.9	10	47.6	171	44.0
2025	42.9	15	62.5	281	66.2
Upper					
2024	28.4	7	33.3	143	36.8
2025	28.4	6	25.0	90	21.1
Not Available					
2024	0.3	0	0.0	0	0.0
2025	0.3	0	0.0	0	0.0
Total					
2024	100.0	21	100.0	388	100.0
2025	100.0	24	100.0	425	100.0
Source: 2020 ACS; Credit Union					

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, reasonable penetration among retail customers of different income levels. This is supported by the credit union's reasonable performance of home mortgage and consumer lending to low- and moderate-income borrowers.

Home Mortgage

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels. Examiners focused on including low- and moderate-income borrowers.

Home mortgage lending to low-income borrowers was above aggregate lending trends in 2024. The credit union's lending to low-income borrowers fell by number and percentage year-over-year but remained consistent with aggregate lending. The percentage of loans to low-income borrowers is far less than the percentage of low-income families (for both the institution and aggregate lenders), which reflects the difficulty for a low-income family (earning less than \$59,500) to qualify for a mortgage (with an average credit request of \$310,166) under conventional underwriting standards.

The credit union's performance to moderate-income lenders was consistent with aggregate lending trends in 2024. The credit union's originated loans in 2025 remained consistent by number but decreased by percentage to fall below aggregate lending in 2025. The credit union's performance for both years was above the demographics of moderate-income families.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2024	23.7	5.1	6	8.3	467	6.4
2025	23.7	5.6	5	5.7	340	2.3
Moderate						
2024	16.3	19.8	15	20.8	1,047	14.4
2025	16.3	20.2	15	17.2	1,355	9.3
Middle						
2024	18.7	27.5	20	27.8	2,607	35.9
2025	18.7	27.3	30	34.5	4,927	33.8
Upper						
2024	41.3	31.8	31	43.1	3,150	43.3
2025	41.3	30.8	37	42.5	7,949	54.6
Not Available						
2024	0.0	15.9	0	0.0	0	0.0
2025	0.0	16.1	0	0.0	0	0.0
Total						
2024	100.0	100.0	72	100.0	7,271	100.0
2025	100.0	100.0	87	100.0	14,571	100.0
Source: 2020 ACS; Credit Union Data, 2024 & 2025 HMDA Aggregate Data,						

Consumer Lending

The credit union's consumer lending reflects excellent penetration of households of different income levels. The credit union's activity among low-income households was below the demographic of low-income households in the assessment area in 2024. The sampled performance more than doubled in 2025 and exceeded the demographic of low-income households.

The credit union's performance among moderate-income households approximately doubled the demographic of moderate-income households in the assessment area in 2024. The number of consumer loans to moderate income households increased by number and percentage in 2025, increasing the margin between the demographic of households and the credit union's performance.

Distribution of Consumer Loans by Borrower Income Level					
Borrower Income Level	% of Households	#	%	\$(000s)	%
Low					
2024	26.2	4	19.0	55	14.2
2025	26.2	10	41.7	150	35.4
Moderate					
2024	15.2	7	33.3	123	31.6
2025	15.2	11	45.8	195	45.9
Middle					
2024	16.1	8	38.1	162	41.9
2025	16.1	2	8.3	39	9.2
Upper					
2024	42.5	2	9.5	48	12.3
2025	42.5	1	4.2	40	9.5
Not Available					
2024	0.0	0	0.0	0	0.0
2025	0.0	0	0.0	0	0.0
Total					
2024	100.0	21	100.0	388	100.0
2025	100.0	24	100.0	425	100.0
Source: 2020 ACS; Credit Union Data					

Response to Complaints and Fair Lending Policies and Procedures

The credit union has not received any CRA-related complaints since the last CRA evaluation; therefore, this criterion did not affect the CRA rating.

The Division of Banks provides comments regarding the institution's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. The fair lending review was conducted in accordance with the Federal Financial Institutions Examination Council (FFIEC) Interagency Fair Lending Examination Procedures. Based on these procedures, no evidence of disparate treatment was noted, and the credit union has an adequate record relative to fair lending policies and procedures.

Minority Application Flow

The credit union's HMDA LARs for 2024 and 2025 were reviewed, with a focus on 2025 performance, to determine if the credit union's application flow from different racial and ethnic groups reflected the assessment area's demographics.

According to 2020 ACS U.S. Census data, the credit union’s assessment area contained a total population of 628,133 individuals of which 35.4 percent are minorities. This illustrates an increase of 5.8 percent in total minorities since the 2015 ACS U.S. Census data. The assessment area’s minority and ethnic populations consist of 21.2 percent Hispanic or Latino, 19.6 percent Other Race, 7.4 percent Black or African American, 3.7 percent Asian, and less than one percent American Indian or Alaskan or Native and Hawaiian/Pacific Islander individuals.

The credit union’s applications were compared with aggregate performance data for the same years. The comparison of this data assists in deriving reasonable expectations for the rate of applications the credit union received from minority home mortgage loan applicants. Please refer to the table below for information on the credit union’s minority application flow as well as the aggregate lenders in the credit union’s assessment area.

MINORITY APPLICATION FLOW						
RACE	2024		2024 Aggregate Data	2025		2025 Aggregate Data
	#	%	%	#	%	%
American Indian/ Alaska Native	0	0.0	0.8	0	0.0	0.7
Asian	3	2.9	3.1	3	2.7	3.0
Black/ African American	4	3.9	7.5	4	3.6	7.3
Hawaiian/Pacific Islander	0	0.0	0.3	0	0.0	0.2
2 or more Minority	0	0.0	0.3	1	0.9	0.2
Joint Race (White/Minority)	2	2.0	1.5	1	0.9	1.5
Total Racial Minority	9	8.8	13.5	9	8.2	12.9
White	78	76.5	62.2	90	81.8	62.9
Race Not Available	15	14.7	24.3	11	10.0	24.2
Total	102	100.0	100.0	110	100.0	100.0
ETHNICITY	#	%	%	#	%	%
Hispanic or Latino	18	17.7	14.0	10	9.1	14.3
Joint (Hisp/Lat /Not Hisp/Lat)	4	3.9	1.9	3	2.7	1.8
Total Ethnic Minority	22	21.6	15.8	13	11.8	16.1
Not Hispanic or Latino	66	64.7	62.0	85	77.3	62.5
Ethnicity Not Available	14	13.7	22.1	12	10.9	21.4
Total	102	100.0	100.0	110	100.0	100.0
<i>Source: U.S. Census 2020, HMDA Aggregate Data, HMDA LAR Data 2024 and 2025</i>						

In 2024, the credit union received 102 home mortgage loan applications from within its assessment area. Of these applications nine applications were received from racial minority applicants. The credit union’s performance was below that of aggregate lenders. The credit union’s racial minority application flow was consistent by number in 2025, with a nominal decrease by percentage. The credit union’s performance was again below aggregate performance but remained reasonably comparable.

The credit union’s ethnic minority application flow exceeded that of aggregate lenders in 2024. The institution’s performance decreased by number and percentage in 2025, falling below aggregate performance for the same year.

The credit union's minority application flow performance correlates to its branch placement and general lending trends. The minority populations are primarily present in Springfield and Holyoke, areas that also represent significant competition for smaller local lenders with a limited branch footprint. The credit union's marketing and strategies do not reflect an avoidance of these areas. Considering the assessment area's demographic composition, economic data, and market competition, the credit union's minority application flow is considered reasonable.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, require all financial institutions to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks, at 710 Grattan St, Chicopee, MA 01020"

[Please Note: If the institution has more than one assessment area, each office (other than off-premises electronic deposit facilities) in that community shall also include the address of the designated office for that assessment area.]

- 4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by the Massachusetts Division of Banks, may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.

SMALL INSTITUTION PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the credit union's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The credit union's loan-to-share ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the credit union's assessment area(s);
- 3) The geographic distribution of the credit union's loans;
- 4) The credit union's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The credit union's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

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

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the credit union under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.