

ADAMS COMMUNITY BANK

COMMUNITY REINVESTMENT ACT POLICY

Board reviewed and approved May 2022
Board reviewed and approved May 2023
Board revised and approved May 2024

**ADAMS COMMUNITY BANK
ADAMS, MASSACHUSETTS**

COMMUNITY REINVESTMENT ACT POLICY

This policy is reviewed annually by CRA Committee and submitted to the Board of Trustees for approval. If a change or update occurs prior to the next scheduled annual review an amendment will be prepared and submitted to the Board of Trustees for approval.

PURPOSE

The Community Reinvestment Act Policy of 1977 (CRA) and the federal banking regulators CRA regulations were enacted to help ensure that banks meet the credit needs of their communities. The Adams Community Bank has delineated one **Assessment Area** in which the regulators will evaluate the Bank's records of helping to meet the credit needs of its community.

STATEMENT

The Adams Community Bank will take an active role in assuring overall compliance with the CRA. The Board of Trustees will review and approve the Bank's CRA Policy, including the reasonableness of the delineated assessment area, at least annually and after each material change. The Board of Trustees will discuss efforts to meet the credit needs of the Community. The Bank will make reasonable efforts to develop and market products and services to meet those needs. The Bank will develop and apply flexible underwriting standards for loans that benefit low or moderate income needs which are consistent with safe and sound banking practices.

CRA COMPLIANCE OFFICER

Assistant Vice President, Dawn Lampiasi is designated as the CRA Compliance Officer, the person responsible for coordinating, documenting and monitoring the Bank's CRA program. The Board of Trustees of the Bank along with the guidance of the CRA Compliance Officer & CRA Committee intends to make sure the bank complies with CRA regulations.

CRA COMMITTEE

The CRA Committee consists of the CRA Compliance Officer, EVP/COO, SVP Retail Lending, AVP Portfolio Manager SVP Mortgage Origination, VP Mortgage Servicing, and AVP Branch Officer.

ASSESSMENT AREA

The Adams Community Bank strives to serve the various savings and credit needs of individual, businesses, and organizations in our community.

Our primary lending area, and the bank's designated assessment area is Berkshire County. (See exhibit A)

CRA NOTICE

The Bank will provide in its lobby of its main office and each of its branches, a copy of its public CRA Notice, (see exhibits B & C).

CRA PUBLIC FILE

The Bank will maintain a public file, in which it will assemble all information and documents required by regulations applicable to the Bank. Upon request, the Bank will provide copies of the information in its public file to any persons requesting such information. The information contained in the Bank's public file will be available at the Bank's main office. The Bank will make available at each of its branches:

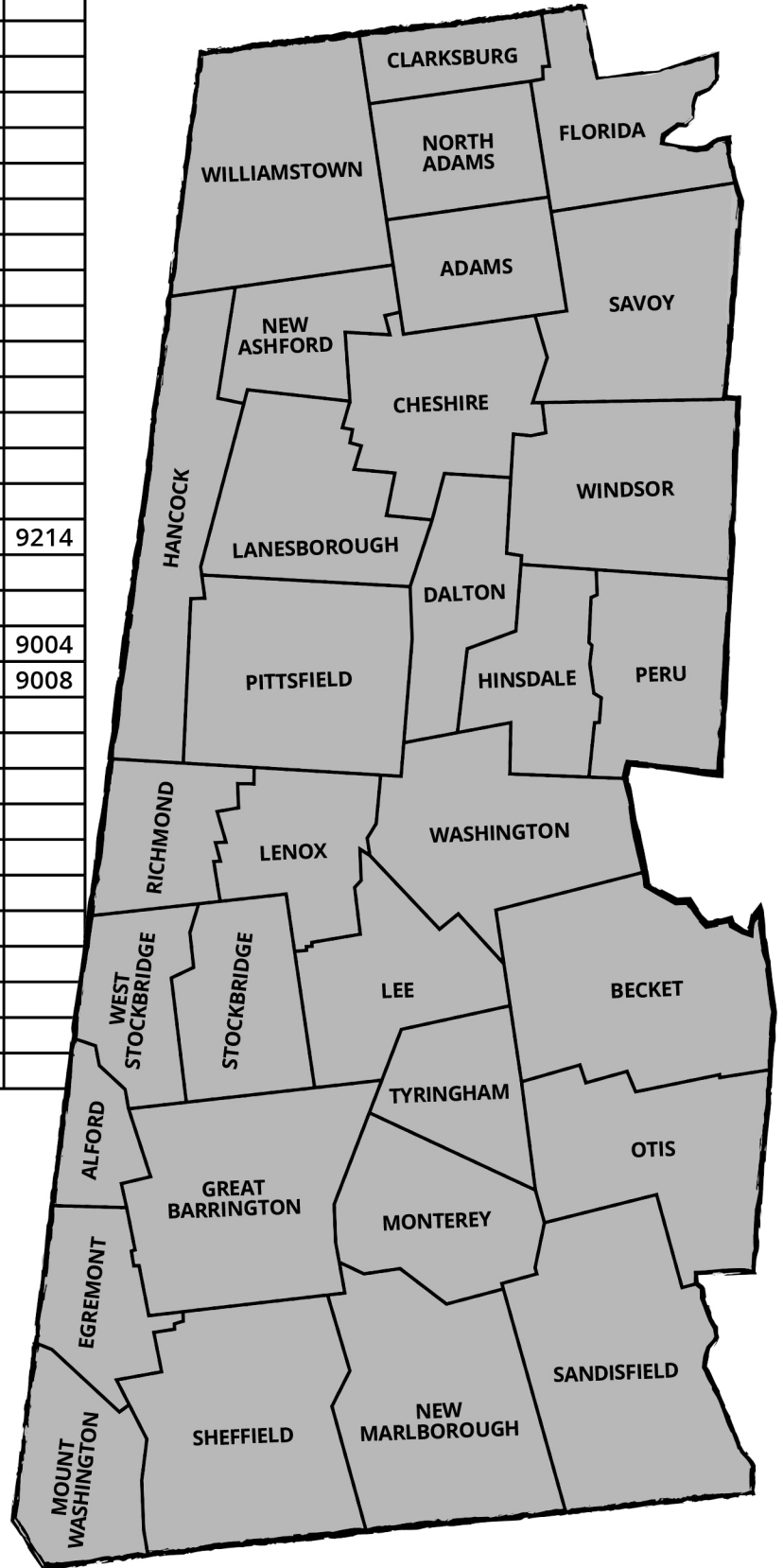
1. A copy of the public section of its most recent CRA Performance Evaluation and a list of services provided by the Branch
2. Within five calendar days of a request, all information in the public file relating to the assessment area in which the branch is located.

The Bank will update its public file in order to ensure that the information contained will be current as of April 1 of each year.

DATA COLLECTION, REPORTING AND DISCLOSURE

The Bank will assemble, collect and maintain such CRA related information as may be required by regulations.

TOWN	CENSUS TRACT #				
Adams	-	9222	9221	9223	
Alford	-	9343			
Becket	-	9322			
Cheshire	-	9231			
Clarksburg	-	9311			
Dalton	-	9121			
Egremont	-	9343			
Florida	-	9313			
Great Barrington	-	9251.01	9251.02		
Hancock	-	9351			
Hinsdale	-	9323			
Lanesborough	-	9111			
Lee	-	9141			
Lenox	-	9131			
Monterey	-	9332			
Mount Washington	-	9343			
New Ashford	-	9351			
New Marlboro	-	9333			
North Adams	-	9353	9215	9213	9214
Otis	-	9334			
Peru	-	9314			
Pittsfield	-	9001	9002	9003	9004
Pittsfield	-	9005	9006	9007	9008
Pittsfield	-	9009	9011	9352	
Richmond	-	9351			
Sandisfield	-	9334			
Savoy	-	9313			
Sheffield	-	9261			
Stockbridge	-	9241			
Tyringham	-	9332			
Washington	-	9322			
West Stockbridge	-	9342			
Williamstown	-	9201.01	9201.02		
Windsor	-	9314			



ADAMS COMMUNITY BANK
COMMUNITY REINVESTMENT ACT NOTICE

Under both the federal and state Community Reinvestment Acts (CRA), the Federal Deposit Insurance Corporation (FDIC) and the Commissioner of Banks (Commissioner) evaluate our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC and the Division also take this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

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

As least 30 days before the beginning of each quarter, the FDIC and the Commissioner publish a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the

REGIONAL DIRECTOR, FDIC
DIVISION OF SUPERVISION AND CONSUMER PROTECTION, FDIC
350 Fifth Avenue, Suite 1200, New York, NY 10118

and from the

COMMISSIONER OF BANKS
1000 Washington Street, 10th Floor, Boston, MA 02118

You may send written comments about our performance in helping to meet community credit needs to our CRA Compliance Officer at:

ADAMS COMMUNITY BANK
93 Park St., Adams, MA 01220

and

FDIC Regional Director and to the Commissioner of Banks. You may also submit comments electronically through the FDIC's Web site www.fdic.gov/regulations/cra. Your letter, together with any response by us, will be considered by the FDIC and the Commissioner in evaluating our CRA performance and may be made public.

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

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Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may view today the public section of our most recent CRA Evaluation, prepared by the FDIC and the Commissioner, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make the request to us: (1) a map showing the assessment area containing this branch, which is the area in which the FDIC and the Commissioner evaluate our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

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