

COMMUNITY REINVESTMENT ACT POLICY

Congress passed the Community Reinvestment Act (CRA) in 1977. The Federal Reserve System Regulation BB implemented the CRA. Congress passed the CRA and required regulations in response to reports of redlining and other credit concerns. The CRA followed the congressional adoption of Title VII of the Housing and Community Development Act of 1977. The primary intent of the Act is to encourage all financial institutions to assess and meet credit and community development needs of their local communities, including low- and moderate-income areas, consistent with the institution's business strategies. The CRA does not, however, prohibit any activities, nor does it require specific allocations of credit.

Gorham Savings Bank's (the Bank's) Board of Directors understands and accepts its responsibilities regarding the CRA. The Bank has been active in its communities since it was first founded in 1868. The Bank is proud of its record of participation and investment it has achieved. By conducting its business in a safe, sound, and fair manner, and by expanding its customer base within its community, the Bank has demonstrated its commitment to the community. In accordance with its strong community investment ethics, the following policy has been adopted in order to ensure the Bank's commitment to its community remains strong and it is in compliance with current CRA regulations.

PURPOSE

The Bank is committed to making a variety of loan types at fair market prices. It is the policy of the Bank to comply with all applicable consumer and fair lending laws. Specifically, no individual will be denied the services of the Bank as a result of discrimination based upon prohibited class or basis per the Bank's Fair Lending Policy. The Bank has controls and compliance procedures in place, including fair lending training, to ensure that such discrimination does not occur, and employees are instructed to treat all persons fairly and not to discourage any individual from applying for credit. The Bank will accept and consider all written applications for credit and will grant such credit based upon safe and sound banking principals. Furthermore, the Bank will continue to strive to ascertain and identify the credit and development needs of its community. This Policy will facilitate those efforts to help meet the credit and community development needs of the Bank's assessment area, which needs include loans, services, and investments that will benefit, in particular, low- and moderate-income individuals and geographies.

GENERAL OBJECTIVES

The overall objectives of this Policy are to express Gorham Savings Bank's commitment to its community and its desire to extend credit and participate in community development programs designed to meet the needs of all community members, including those in low- and moderate-income areas.

PROGRAM ADMINISTRATION AND RESPONSIBILITIES

Gorham Savings Bank's (the Bank) CRA Policy and related elements will be reviewed annually by its Board of Directors. A CRA report will be provided on an annual basis to the Board of Directors and will include specific information detailing lending activities in its assessment area; an analysis of the geographic

distribution of credit applications, credit extensions, and credit denials; outreach initiatives; and analysis of any various ongoing feedback surveys that disclose customer needs and/or concerns.

BOARD OF DIRECTORS

- Monitor lending activity to ensure that Bank activities properly assess and meet the credit needs of its community, including the low and moderate income.
- Appoint a Bank management team member as the CRA Officer.
- Review reports and monitor Bank activities related to CRA.

CRA OFFICER

- Monitor Bank performance under the three CRA performance tests; Lending, Investment and Service Test.
- Establish CRA guidelines to ensure successful compliance with assessment factors established by the regulators.
- Develop and document the Bank's efforts to meet the needs of its community, including the low and moderate income.
- Maintain the public file.
- Ensure appropriate staff training.

CRA MANAGEMENT COMMITTEE

The CRA officer serves as chairperson for the CRA committee. The Committee consists of the chairperson and representatives of departments across the bank, including but not limited to:

- Executive
- Credit
- Risk
- Residential Lending
- Commercial/Business Lending
- Marketing
- Compliance
- Community Relations
- Board of Directors

The Committee's responsibilities include:

- Review reports and documentation of the Bank's efforts to meet its responsibilities in meeting the needs of the community; including, low and moderate income.
- Review of the assessment area on an annual basis to ensure the appropriateness of the designated assessment area.
- Provide assistance to the CRA Officer in documenting the Bank's performance related to CRA.

REGULATORY ELEMENTS

THE BANK'S ASSESSMENT AREA

The Bank's CRA Management Committee has recommended and the Board of Directors has adopted the Bank's current delineated CRA assessment area as those cities, towns and communities adjacent to and surrounding the Bank's main office and its branches. (See attached Addendum A for Branch Locations and Hours of Operation.) The Bank's Assessment Area (Addendum B) will be reviewed on an annual basis by the Bank's CRA Management Committee for approval by the Board of Directors. The current assessment area specifically includes the following cities and towns some of which have the same census tract designations, e.g. Baldwin/Sebago, Dayton/Lyman:

Breakdown of Census Tracts within Assessment Area by Income Level

Census Tract	#	%
Low (0<50% of MFI)	1	1.02%
Moderate (50%<80% of MFI)	17	17.35%
Middle (80%<120% of MFI)	56	57.14%
Upper (120%+ of MFI)	24	24.49%
TOTAL	98	100.0%

Breakdown of Census Tracts within Assessment Area by County/Town

CUMBERLAND COUNTY

PORTLAND				
1.00 Middle	2.00 Moderate	3.00 Middle	5.00 Moderate	6.00 Moderate
10.00 Middle	11.00 Moderate	12.00 Middle	13.00 Upper	15.00 Middle
17.00 Middle	18.00 Middle	19.00 Upper	20.01 Middle	20.02 Middle
21.01 Upper	21.02 Moderate	22.00 Middle	23.00 Middle	24.00 Middle
FALMOUTH				
25.01 Upper		25.03 Upper		
25.04 Upper				
YARMOUTH				
44.01 Middle		44.02 Upper		
NORTH YARMOUTH				
46.00 Upper				
WESTBROOK				
26.00 Upper	27.00 Middle	28.00 Middle	29.01 Moderate	
29.02 Middle				
SOUTH PORTLAND				
30.01 Middle	30.02 Moderate	31.00 Moderate	32.00 Middle	33.00 Middle
34.00 Middle	35.00 Upper			
SCARBOROUGH				
173.03 Upper		173.05 Upper		173.06 Upper
173.07 Upper		173.08 Upper		

CAPE ELIZABETH		
37.01 Upper		37.02 Upper
GORHAM		
40.01 Middle	40.02 Upper	41.00 Middle
CUMBERLAND		
42.01 Upper		
42.02 Upper		
FREEPORT		
45.01 Middle		
GRAY		
47.01 Middle		47.02 Middle
WINDHAM		
48.02 Middle	48.03 Middle	48.04 Middle
48.05 Upper		
NEW GLOUCESTER/POWNAI		
115.0 Middle		
RAYMOND		
120.01 Middle		
120.02 Moderate		
CASCO		
130.01 Middle		
130.02 Middle		
NAPLES		
140.01 Middle		
140.02 Moderate		
BALDWIN/SEBAGO/WEST BALDWIN		
165.00 Middle		
STANDISH/FRYE ISLAND/STEEP FALLS		
170.02 Middle		170.03 Middle
170.04 Middle		

YORK COUNTY

SACO			
51.00 Middle	52.00 Middle		53.01 Moderate
53.02 Upper	54.00 Upper		
Old Orchard			
61.03 Moderate		61.04 Middle	
61.05 Middle		61.06 Middle	
BUXTON			
200.01 Middle			
200.02 Middle			
HOLLIS			
210.00 Middle			

LIMINGTON				
220.00 Moderate				
LIMERICK				
230.00 Middle				
WATERBORO				
240.01 Moderate				
240.02 Middle				
DAYTON/LYMAN				
245.01 Moderate				
245.02 Middle				
BIDDEFORD				
251.00 Middle	252.03 Middle	252.04 Low	252.05 Moderate	252.06 Moderate
253.00 Middle	254.00 Middle			
ARUNDEL				
260.00 Middle				
KENNEBUNKPORT				
270.00 Upper				
KENNEBUNK				
280.01 Middle			280.03 Middle	
280.04 Middle				

This assessment area has been delineated as a result of various factors, including the Bank's size, condition, lending expertise, its loan portfolio and total deposits, and its competition. This assessment area delineation does not reflect any illegal discrimination, nor does it exclude low- or moderate-income geographies.

ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

Key elements of a successful CRA Program include both proper ascertainment of the needs of the Bank's assessment area and then implementation of effective marketing strategies based upon those needs. To assist this Bank in those efforts, representatives of the Bank will periodically contact local government officials, businesses, and community organizations. These efforts will facilitate the Bank's goal of establishing ongoing communication links between itself and the community it serves.

After initially determining which groups are most concerned with and active in addressing community needs and development, the Bank will prioritize its resources in making future contacts if time and staffing restraints restrict the frequency of calls that can otherwise be made.

COMPLIANCE WITH FAIR LENDING LAWS AND NON-DISCRIMINATION IN CREDIT

It is the Bank's policy to comply with all applicable consumer and fair lending laws in all areas of lending, including residential mortgage, consumer and commercial lending. The Bank's Directors also recognize their responsibility to oversee the establishment of systems and procedures necessary to comply with fair lending laws and to monitor those systems. As a result, the Board of Directors has directed management to take the following steps to help determine possible instances and the reasons for any disparities in the manner in which the Bank handles loan applications, and further, to ensure that no illegal discrimination from the Bank's lending practices occurs:

- **ENSURE EQUALITY IN CUSTOMER SERVICE.** All applicants will receive the same and equal measures of assistance, diligence, patience, and flexibility.

Bank employees will receive training on the importance of giving all customers equal and fair treatment. In particular, training for loan officers will anticipate and address any stereotyped assumptions and will describe options that should be offered equally to borrowers who do not meet conventional lending standards.

Appropriate documentation will be maintained by all lending officers to help management ensure that compensating factors, unconventional documentation of creditworthiness, and explanations of negative information are considered equally for all applicants.

- **RECORD AND EVALUATE REASONS FOR CREDIT DENIAL.** Credit denial information will be recorded for all loans, including those recorded on the Bank's Home Mortgage Disclosure Act (HMDA) register, in order to allow management to determine whether reasons for denial are equally distributed among applicants.

Further periodic tabulations of reasons for denial should then show whether an overall disparity in denial rates reflects a disproportionate use of one or two reasons with respect to minority applicants. A similar review of non-minority approvals can also aid in determining whether those approvals included deficiencies comparable to those in the denied minority applications. If a pattern is discovered, management will strive to address why similar flaws in creditworthiness were treated differently.

- **ESTABLISH REVIEW SYSTEMS.** A system to review the application of underwriting standards will aid management in ensuring that applicants receive equal treatment. Such "second reviews" will primarily focus on how frequently and why non-minority applicants with deficiencies are granted loans.

In addition to verifying that denied applicants have credit deficiencies, this system will focus on whether the deficiencies of rejected minority applicants were worse than those of successful non-minority applicants and whether the Bank made equal efforts to help all customers qualify for credit.

THE PERFORMANCE TESTS

The Bank will be evaluated under the three CRA performance tests conducted by the federal regulators; Lending Test, Investment Test and Service Test.

The CRA Officer and the CRA Management Committee will review the performance of the Bank on an annual basis to ensure compliance with the CRA regulation. This review will include a review of the lending activity, including the low and moderate-income tracts and the low and moderate income borrowers. In addition, an annual disclosure of the Community Development loans will also be presented. Bank activities and actions relevant to the investment and service tests will also be documented and reviewed.

DATA COLLECTION

Pursuant to the CRA's requirements, the Bank will collect and maintain in machine-readable form data for each small business and small farm loan originated or purchased by the Bank. The Bank will establish written procedures regarding what information it will collect and the record keeping of such data.

CRA PUBLIC FILE

Pursuant to the requirements of the Act, the Bank will maintain a CRA public file and make it available to the public for inspection upon request.

The public file will include the following information:

- All written comments received from the public for the current year and each of the two prior calendar years that specifically relate to the Bank's performance in helping to meet the community's credit needs;
- Within thirty (30) days of receipt, a copy of the public section of the Bank's most recent CRA performance evaluation;
- A list of the Bank's branches, their street addresses and geographies;
- A list of branches opened and closed by the Bank during the current year and each of the two prior calendar years, their street addresses and geographies;
- A list of services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the Bank's branches and descriptions of any material differences in the availability or cost of services at particular branches (if any);
- A map of the Bank's assessment area that identifies the geographies in the area;
- The Bank's CRA Disclosure Statements for the prior two calendar years;
- The bank's notice of availability of the HMDA disclosure statement for the prior two calendar years on the CFPB website;
- The bank's loan to deposit ratio.

CRA public notice

The Bank will also display the required CRA public notice in the public lobby of its office, as well as in the public lobbies of each of the Bank's branches, all as set forth under the Act.

Approved by the Board of Directors
This 15th day of February 2023

A handwritten signature in black ink that reads "Heather Connolly". The signature is written in a cursive style with a large, prominent "H" and "C".

Heather Connolly, Clerk
Gorham Savings Bank

Addendum A

Branch Locations

Date Established	Branch Location	Geography
1868	Gorham Branch 64 Main Street, Gorham, Maine 04038	40.02
September 1979	Standish Branch Route 25 Colonial Marketplace, Standish, Maine 04038	170.01
March 1992	Windham Branch 766 Roosevelt Trail, Windham, Maine 04062	48.01
June 1995	Scarborough Branch 38 Hannaford Drive, Scarborough, Maine 04074	173.01
November 1999	Falmouth Branch - Gray Road 65 Gray Road, Falmouth, Maine 04105	25.02
June 2001	Waterboro Branch 11 Sokokis Trail, East Waterboro, Maine 04030	240.00
September 2003	South Portland Branch 395 Gorham Road, South Portland, Maine 04106	30.00
June 2004	Portland Branch –Commercial Street 172 Commercial Street, Portland, Maine 04101	3.00
November 2004	Portland Branch - Marginal Way 71 Marginal Way, Portland, Maine 04101	6.00
June 2010	Falmouth Branch - Route 1 202 US Route 1, Falmouth, Maine 04105	25.01
April 2017	Portland – India Street 1 India Street, Portland, ME 04101	3.00
September 2019	Yarmouth Branch 288 Main Street, Yarmouth, ME 04096	44.01



HOURS OF OPERATION

All Locations have 24 Hour ATM Available

GORHAM*

Drive Up Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

Lobby Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

FALMOUTH – GRAY ROAD*

Drive Up Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

Lobby Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

FALMOUTH – ROUTE 1*

Drive Up Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

Lobby Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

PORTLAND – COMMERCIAL STREET

Drive Up Hours

M-Th: 8:00am – 4:00pm
Fri: 8:00am – 5:00pm
Sat: 9:00am – Noon

Lobby Hours

M-Th: 9:00am – 4:00pm
Fri: 9:00am – 5:00pm
Sat: 9:00am – Noon

PORTLAND – MARGINAL WAY

Drive Up Hours

M-W: 7:30am – 4:00pm
Th-Fri: 7:30am – 5:00pm
Sat: 8:00am – Noon

Lobby Hours

M-W: 9:00am – 4:00pm
Th-Fri: 9:00am – 5:00pm
Sat: 9:00am – Noon

PORTLAND – INDIA STREET*

Drive Up Hours

None

Lobby/ITM Hours

M-F 9:00am – 4:00pm

SCARBOROUGH*

Drive Up Hours

M-Th: 8:30am – 4:00pm

Lobby Hours

M-Th: 8:30am – 4:00pm

Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

Fri: 8:30am – 5:00pm
Sat: 8:30am - Noon

STANDISH*

Drive Up Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

Lobby Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am - Noon

SOUTH PORTLAND

Drive Up Hours

M-W: 7:30am – 4:00pm
Th-Fri: 7:30am – 5:00pm
Sat: 9:00am – Noon

Lobby Hours

M-W: 9:00am – 4:00pm
Th-Fri: 9:00am – 4:00pm
Sat: 9:00am - Noon

WATERBORO*

Drive Up Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

Lobby Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am - Noon

WINDHAM*

Drive Up Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

Lobby Hours

M-Th: 8:30am – 4:00pm
Fri: 8:30am – 5:00pm
Sat: 8:30am – Noon

YARMOUTH*

Drive Up Hours

None

Lobby Hours

M-Fri: 8:30am – 4:00pm
Sat: 9:00am – Noon

WESTBROOK*

Drive Up Hours

None

Lobby Hours

None

- Notes service hours from 7:30am – 6:00pm via an ATM.

Addendum B

GORHAM SAVINGS BANK- ASSESSMENT AREA 2022



