



PUBLIC DISCLOSURE

July 14, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Forest Park National Bank and Trust Company
Charter Number 14566

7348 West Madison Street
Forest Park, IL., 60130

ADC - Downers Grove Field Office (8308)
Office of the Comptroller of the Currency
2001 Butterfield Road, Suite 400
Downers Grove, IL., 60515

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- Forest Park's distribution of loans among geographies of different income levels within in its AA is reasonable.
- Forest Park originated or purchased a majority of its loans from inside its AA.
- Forest Park's loan-to-deposit (LTD) ratio is reasonable.
- Forest Park's distribution of loans to individuals of different income levels within its AA is reasonable.

The Lending Test rating is based on Forest Park National Bank and Trust Company's (FPNBT or Forest Park) performance in the state of Illinois.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio was reasonable. The bank's loan-to-deposit ratio averaged 76.4 percent over the past 12 quarters. The timeframe used for this calculation represents January 1, 2022 through December 31, 2024. Over this period, the bank's quarterly loan-to-deposit ratio ranged from a low of 68.9 percent to a high of 83.8 percent.

We compared FPNBT's average quarterly loan-to-deposit-ratio to the ratios of 10 similarly situated federal- and state-chartered banks in the bank's AA based on a combination of size, location, and lending opportunities. The similarly situated banks ranged in asset size from \$218 million to \$487 million and had a combined average quarterly loan-to-deposit-ratio of 81.1 percent during the same period. FPNBT ranked fifth highest of the comparable institutions.

Lending in Assessment Area

A majority of the bank's loans were inside its AA. The bank originated and purchased 76.8 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	111	77.08%	33	22.92%	144	55,761	81.00%	13,082	19.00%	68,843
Small Business	15	75.00%	5	25.00%	20	1,728	78.65%	469	21.35%	2,197
Total	126	76.83%	38	23.17%	164	57,489	80.92%	13,551	19.08%	71,040
Source: Home Mortgage: 1/1/2023 - 12/31/2024 Bank Data. 1/1/2022-12/31/2022 based on a sample of 20 loans as the bank was not a HMDA reporter in 2022. Small Business: Based on a sample of 20 loans. Due to rounding, totals may not equal 100.0%										

Description of Institution

FPNBT is an intrastate financial institution headquartered in Forest Park, Illinois and wholly owned by First Forest Park Corporation, a one-bank holding company also located in Forest Park, Illinois. The bank is primarily a commercial real estate lender. FPNBT has two full-service banking offices, and two deposit-taking automated teller machines located in Forest Park, Illinois. There are two subsidiaries of the bank, First Forest Park Capital Trust II, and First Forest Park Capital Trust III, both located in Forest Park, Illinois, which are both associated with the trust preferred securities issued by the holding company. No affiliate activities were included in this evaluation. There have been no mergers or bank acquisitions since the prior CRA evaluation.

FPNBT's primary business focus is on commercial lending and investor-owned 1-4 family residential real estate mortgages. The bank also offers consumer and investor residential secondary market mortgages through its correspondent banking relationships. A portion of those loans were to low- and moderate-income borrowers; however, the bank does not receive CRA credit for these as they are reported on the investors' HMDA LAR. The bank is currently an investor of the Community Investment Corporation (CIC), a not-for-profit 501(c)(3) corporation with a mission of stabilizing the Chicago area's lower income neighborhoods by rebuilding the affordable multifamily housing stock while generating a fair return for investors. CIC makes loans for affordable housing that is predominately occupied by households under 80% of median income. Bank management finds this to be an effective method of reinvesting in lower income neighborhoods in their assessment area, having a greater impact on the communities they serve.

As of December 31, 2024, FPNBT reported assets totaling \$326 million and tier one capital of \$25.6 million. The net loan portfolio totaled \$242 million, representing 74 percent of total assets. The bank's loan portfolio is comprised of 24.9 percent 1-4 family residential real estate mortgages, 22.2 percent multifamily residential loans, and 40.8 percent commercial real estate loans.

The bank has one AA which includes all of Cook County, Illinois. Both branches are located in Forest Park, Illinois with deposit taking ATMs. The main branch is full service, while the second location is drive-up only. FPNBT belongs to the Allpoint Network, a surcharge-free ATM network with over 55,000 participating ATMs nationwide. The AA conforms to regulatory requirements and does not arbitrarily exclude LMI geographies.

FPNFT received an “Satisfactory” at their last CRA evaluation dated June 13, 2022. There are no legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assessed the bank’s CRA performance, using Small Bank Examination Procedures, which assess the bank’s record of meeting the credit needs of its AA through lending activities. These procedures only include the Lending Test. The evaluation period for this review was January 1, 2022, through December 31, 2024.

Based on our review of all loans originated and purchased in the evaluation period, we determined the bank’s primary loan products to be home mortgage and small business loans. Our small business analysis was based upon a random sample of 20 commercial loans originated during this review period. For the analysis of home mortgage loans, we utilized data the bank reported on their HMDA LAR for 2023 and 2024. As the bank was not a HMDA reporter in 2022, we selected a sample of 20 home mortgage loans for that year.

For analysis purposes, we compared FPNBT’s lending performance with demographic data from the 2020 U.S. Census, and the 2022 HMDA aggregate peer data. Additionally, for small business lending, we utilized the 2022, 2023, and 2024 Dunn and Bradstreet demographic data. No affiliate activity was included in this analysis. Refer to the tables in Appendix A for more information on the scope of the review.

Selection of Areas for Full-Scope Review

Examiners completed a full-scope review of the bank’s one AA, which consists of all of Cook County. Refer to Appendix A for more information.

Ratings

The bank’s overall rating is based on the State of Illinois rating. The State of Illinois rating is based on the Cook County MSA AA full-scope review. If performance varied among loan products, results were weighted according to the number of loans originated. Refer to the “Scope” section under the state rating section for details regarding how the areas and loan products were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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.

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- Forest Park's distribution of loans across geographies of different income levels within its AA is reasonable.
- Forest Park's distribution of loans to individuals of different income levels is reasonable.
- Forest Park did not receive any complaints regarding its CRA performance during the evaluation period.

Description of Institution's Operations in Illinois

FPNBT's primary focus is commercial lending and investor-owned 1-4 family residential real estate mortgages. FPNBT has one main bank location and one additional branch, both in Forest Park, Illinois. Each location has a deposit-taking ATM. The bank also belongs to the Allpoint Network allowing their customers to withdraw cash without surcharges at any of over 55,000 Allpoint locations.

The bank designated all of Cook County, Illinois as its AA which includes 1,332 census tracts (CTs). The AA is composed of 16.9 percent low-income CTs, 26.4 percent moderate-income CTs, 27.7 percent middle-income CTs, 27.9 percent upper income CTs, and one percent of the CTs have no designated income level. Given the bank's size and office locations, it would be difficult for the bank to serve the entire county.

Competition

Competition within the AA is very strong, including local, regional, and nationwide financial institutions of all sizes that operate within Cook County. The FDIC deposit market share report for 2024 included 157 financial institutions, with 2,182 offices taking deposits within the AA. FPNBT ranked 91st out of these financial institutions. Bank competitors include large financial institutions, with the top ten operating 1,152 branches in the AA and holding 75 percent of the market share. This compares to FPNBT's two offices and market share of 0.05 percent. These significantly larger institutions have a much higher capacity to lend.

Population

According to 2020 U.S. Census data, 10.1 percent of the families in the AA during the evaluation period were living below the poverty level. There were 5.3 million persons residing in the AA, with 13.3 percent living in low-income CTs, 26.9 percent living in moderate-income CTs, 30.4 living in middle-income CTs, 28.9 percent living in upper-income CTs, and 0.5 percent living in CTs with unspecified

income levels. Of the AA's 1.2 million families, 27.3 percent were low-income, 16.9 percent were moderate-income, 18.1 were middle-income, and 37.7 percent were upper-income.

Employment and Economic Factors

According to the U.S. Census data, the unemployment rate in Cook County averaged to 5 percent during the evaluation period. This is slightly higher than the average statewide unemployment rate of 4.7 percent for this same time frame.

According to Moody's Analytics, industries driving the local economy include professional and business services, education and health services, government positions, and leisure and hospitality services. The largest employers include Amazon, Advocate Health Care System, Northwestern Memorial Healthcare, University of Chicago, and Walgreens Boots Alliance Inc.

Housing

According to the 2020 U.S. Census, there were 2,198,489 housing units in the AA, with 51.9 percent owner-occupied, 38.7 percent rentals, and 9.4 percent were vacant. The percentage of vacant units in low- and moderate-income CTs was 24 percent and 27 percent, respectively. The median monthly gross rent was \$1,129. The median age of the housing units in the AA was 64 years and the median value was \$238,750. Older homes are often more expensive to maintain, require significant repairs to meet building code requirements, and are typically less energy efficient. As a result, these contribute to the overall cost of homeownership which can impact home affordability for low- and moderate-income families.

The following table depicts demographic information on Cook County, Illinois:

Assessment Area - Cook County MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,332	16.89	26.35	27.70	27.85	1.20
Population by Geography	5,275,541	13.35	26.85	30.44	28.85	0.51
Housing Units by Geography	2,198,489	13.33	25.37	29.72	30.94	0.64
Owner-Occupied Housing by Geography	1,139,938	7.32	22.78	34.70	34.90	0.30
Occupied Rental Units by Geography	851,536	18.79	28.45	25.09	26.64	1.02
Vacant Units by Geography	207,015	23.96	26.95	21.37	26.83	0.90
Businesses by Geography	215,710	7.99	19.95	28.81	42.58	0.67
Farms by Geography	2,834	8.43	21.42	31.02	38.74	0.39
Family Distribution by Income Level	1,183,425	27.28	16.93	18.05	37.74	0.00
Household Distribution by Income Level	1,991,474	28.78	15.66	16.40	39.15	0.00
Unemployment rate (%)	7.04	15.64	8.99	5.56	3.71	13.99
Households Below Poverty Level (%)	13.35	29.89	16.20	10.18	7.38	29.46
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		\$92,622	Median Housing Value			\$238,750
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2024		\$109,800	Median Gross Rent			\$1,129
			Families Below Poverty Level			10.10
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

COMMUNITY CONTACT

During our analysis, we considered information from a local community contact working with the Village of Forest Park to determine local economic conditions and community needs. According to this community contact, affordable housing for low- and moderate-income individuals is a need within the Forest Park area, as well as loans to small business. The contact indicated that within the last year, there has been an increase in housing prices of a magnitude that has never been experienced prior. This has made it more challenging for low- to moderate-income individuals to afford housing in the area, especially compared to the surrounding communities. They expressed that banks could perform more community outreach activities instead of simply performing standard marketing. More marketing specifically targeted to low- and moderate-income individuals is needed. There are also opportunities for smaller institutions to offer similar products and services as the larger institutions.

Scope of Evaluation in Illinois

Examiners completed a full-scope review of the bank's one AA, which consists of all of Cook County. We gave more weight to the bank's home mortgage lending performance, given its higher volume of originations by number of loans compared to small loans to businesses. Refer to Appendix A for more information.

LENDING TEST

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

Conclusions for Cook County Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in Cook County MSA was reasonable.

Distribution of Loans by Income Level of the Geography

FPNBT exhibits reasonable geographic distribution of loans in Illinois.

Home Mortgage Loans

Refer to Table 7 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

FPNBT's distribution of home mortgage loans by income level of the geography is reasonable.

The bank's performance in the low-income CTs is reasonable. The proportion of home mortgage loans in low-income geographies is near-to both the percentage of owner-occupied housing and aggregate home mortgage lending. The bank's performance in the moderate-income CTs is also reasonable. The proportion of bank home mortgage loans in moderate-income geographies is slightly below both the percentage of owner-occupied housing and aggregate home mortgage lending.

Small Loans to Businesses

Refer to Table 9 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

FPNBT's distribution of loans to small businesses by income level of the geography is poor.

Based on the loan sample, the bank's performance in low-income CTs is reasonable. The proportion of bank loans to small businesses in low-income geographies is slightly below both the percentage of businesses and aggregate business lending. The bank's performance in moderate-income CTs is very poor. The proportion of bank loans to small businesses in moderate-income geographies is well below both the percentage of businesses and aggregate business lending. There are more small business lending opportunities in moderate-income geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. Examiners reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank and considering performance context.

Home Mortgage Loans

Refer to Table 8 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

FPNBT's borrower distribution of home mortgage loans by income level of the borrower is reasonable given performance context.

The borrower distribution of home mortgage loans in low-income CTs is very poor. The proportion of bank home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and well below aggregate lending. The borrower distribution of home mortgage loans in moderate-income CTs is also very poor. The proportion of bank home mortgage loans to moderate-income borrowers was significantly below both the percentage of moderate-income families and aggregate lending.

The bank's performance is impacted by its lending strategy focused on investor-owned real estate mortgages and housing affordability challenges in the AA. Investor loans are typically higher net worth individuals. About 81 percent of the bank's HMDA reportable loans were to real estate investor entities, which typically do not collect or report borrower income information for HMDA purposes. Based on 21 loans with income information available, two loans were extended to both low- and moderate-income borrowers, and 17 to middle-income borrowers. Considering only these 21 loans, lending to moderate-

income borrowers improves to 9.5 percent but performance remains significantly below both the percentage of moderate-income families and aggregate lending. Lending to low-income borrowers represents 9.5 percent which remains significantly below demographics but is near-to aggregate lending of 10 percent, which is reasonable. Aggregate lenders are also significantly below demographics reflecting housing affordability challenges in the AA. Mortgage interest rates pushed higher during the evaluation period from historic lows during the COVID pandemic. Low-income families make \$54,900 or less (50 percent of 2024 FFIEC adjusted median family income in the AA), and moderate-income families make \$87,840 (80 percent of FFIEC adjusted median family income in the AA). One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates to a maximum monthly mortgage payment of \$1,373 for low-income borrowers and \$2,196 for moderate-income borrowers. Assuming a 30-year mortgage with a 6.3 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value of \$238,750 would be \$1,478. These costs are challenging and limit lending opportunities for low-income families, which is also reflected by lower aggregate lending compared to demographics. More families are considered low-income in the AA than moderate-income.

Small Loans to Businesses

Refer to Table 10 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses of different sizes is reasonable. The proportion of bank loans to businesses with revenues less than \$1 million was below the percentage of businesses and significantly exceeded the aggregate industry distribution of loans to those businesses.

Responses to Complaints

Forest Park did not receive any complaints regarding its CRA performance during the evaluation period.

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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	1/1/2022-12/31/2024	
Bank Products Reviewed:	Home Mortgage Loans Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Cook County MSA	Full-Scope	The AA consists of all of Cook County.

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
Forest Park National Bank and Trust Company	Satisfactory
State:	
Illinois	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Low-Income: Individual income that is at 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 state/AA.

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

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

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Cook County MSA	111	55,761	100	204,281	7.32	6.30	7.62	22.78	18.92	21.57	34.7	24.32	32.87	34.9	50.45	37.59	0.3	--	0.35
Total	111	55,761	100	204,281	7.32	6.30	7.62	22.78	18.92	21.57	34.7	24.32	32.87	34.9	50.45	37.59	0.3	--	0.35

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Cook County MSA	111	55,761	100.00	204,281	27.28	1.80	9.97	16.93	1.80	21.71	18.05	--	19.96	37.74	15.32	30.37	--	81.08	17.98
Total	111	55,761	100.00	204,281	27.28	1.80	9.97	16.93	1.80	21.71	18.05	--	19.96	37.74	15.32	30.37	--	81.08	17.98

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Cook County MSA	20	2,127	100	296,981	7.99	5.00	6.7	19.95	10.00	20.24	28.81	35.00	31.88	42.58	50.00	40.6	0.67	0	0.58
Total	20	2,127	100	296,981	7.99	5.00	6.7	19.95	10.00	20.24	28.81	35.00	31.88	42.58	50.00	40.6	0.67	0	0.58
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cook County MSA	20	2,127	100	296,981	80.78	70.00%	55.83	11.02	30.00%	8.19	0	
Total	20	2,127	100	296,981	80.78	70.00%	55.83	11.02	30.00%	8.19	0	
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.												
Due to rounding, totals may not equal 100.0%												