Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

February 2, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hinsdale Bank & Trust Company, N.A.
Charter Number: 25212

25 East First Street
Hinsdale, Illinois 60521

Office of the Comptroller of the Currency

Regional and Midsize Financial Institutions
400 7th Street SW
Washington D.C., 20219

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 Outstanding.

The following table indicates the performance level of Hinsdale Bank and Trust Company, N.A. with respect to the Lending, Investment, and Service Tests:

	Hinsdale Bank & Trust Company Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in the state of Illinois, which had an excellent geographical and an adequate borrower distribution of loans. The bank's lending levels reflect excellent responsiveness to assessment area (AA) credit needs. The bank was a leader in making community development (CD) loans, which had a positive impact on the Lending Test conclusion. The bank makes extensive use of innovative and flexible products to serve the credit needs of its AA.

- The Investment Test rating is based on excellent performance in the state of Illinois and reflects an excellent responsiveness to credit and community economic development needs through the origination of qualified investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

- The Service Test rating is based on excellent performance in the state of Illinois and reflects service delivery systems that are readily accessible to geographies and individuals of different income levels. The bank was a leader in providing CD services. We also positively considered the installation of a new deposit-taking Automated Teller Machine (ATM) in a moderate-income tract during the evaluation period, which enhanced the bank's service delivery system.

Nationwide Qualified Investments

At the national level, the bank made four qualified investments totaling $910,000 during the current evaluation period. These investments consisted of certificates of deposit placed with Minority Depository Institutions (MDIs) and Certified Community Development Financial Institutions (CDFIs). These institutions focus on promoting financial inclusion and expanding access to capital in underserved and economically distressed communities nationwide.

These qualified investments contributed to broader CD efforts promoting access to credit, financial literacy, and small business growth in economically disadvantaged areas across the country.

Lending in Assessment Area

A very small percentage of the bank's loans were in its AA.

The bank originated and purchased 4.3 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.

Nationwide lending programs are used by the bank, which impact the ratio of loans located inside the bank's AA. The bank purchases loans from an affiliate. First Insurance Funding (FIRST) loans are originated by Lake Forest Bank & Trust, N.A. (LFBT), and the majority are sold to other affiliate banks. During the evaluation period, the bank purchased 97,824 loans from FIRST. A substantial majority of FIRST loans are originated outside the bank's AA and revenue data was not provided.

Barrington Bank & Trust, N.A.'s (BBT) subsidiary, Wintrust Mortgage (WM), has a nationwide presence, which results in a small number of loans originating in the bank's AA. Refer to the Description of the Institution narrative below for more details relating to WM lending. The primary lending product based on volume of loans by number is small business loans. Conclusions regarding lending inside and outside the AA are factored into the analysis of the distribution of lending by income level of the geography.

Table 1: Lending Inside and Outside of the Assessment Area 2022 - 2025

Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	518	69.25	230	30.75	748	340,075	49.32	349,491	50.68	689,566
Small Business	3,654	3.67	95,844	96.33	99,498	345,909	8.10	3,926,846	91.90	4,272,755
Small Farm	2	3.45	56	96.55	58	360	5.10	6,705	94.90	7,065
Consumer	176	80.73	42	19.27	218	7,086	56.98	5,350	43.02	12,436
Total	**4,350**	**4.33**	**96,172**	**95.67**	**100,522**	**693,430**	**13.92**	**4,288,392**	**86.08**	**4,981,822**

Source: 1/1/2022 - 12/31/2025 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

Hinsdale Bank and Trust, N.A. (HBT or the bank) is a $6.1 billion intrastate bank headquartered in Hinsdale, Illinois. HBT is a wholly-owned subsidiary of Wintrust Financial Corporation (WFC), a financial services holding company headquartered in Rosemont, Illinois. As of December 31, 2025, WFC reported approximately $71.1 billion in total consolidated assets. WFC operates through a community banking model, consisting of 16 wholly-owned banking affiliates, with more than 200 bank branch locations. WFC's market coverage is primarily concentrated in the Chicago metropolitan area, with additional banking and lending operations in southeastern Wisconsin, northwest Indiana, and west-central Michigan.

WFC locations provide a wide range of lending and deposit products and services to their customers. WFC residential mortgage applications are referred to WM, a division of BBT. WM is a national residential mortgage operation with offices throughout the United States, offering a wide variety of retail mortgages and originating nearly all WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 16 WFC banks for their portfolio.

WFC provides niche lending products across the nation within their community banks. These specialty products include wealth management advisory services, commercial insurance premium financing through FIRST, lease financing, short-term account receivable financing, administrative services, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2025, HBT reported total loans of $4.5 billion, representing 74.3 percent of total assets. The primary loan products include approximately $3.3 billion of commercial loans or 73.5 percent of total loans, $782 million in residential lending or 17.2 percent of total loans, and $419 million of consumer loans or 9.2 percent of total loans. Tier 1 capital totaled $576.8 million.

The bank operates 16 full-service locations, one drive-up only location, and 19 deposit-taking ATMs. Since the last performance evaluation, HBT opened one new branch in an upper-income census tract (CT) and installed a deposit-taking ATM in a moderate-income CT in the AA.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. There were no acquisitions or mergers during the evaluation period that would have affected the bank's CRA performance or the OCC's analysis. HBT's CRA performance was rated "Outstanding" in the last performance evaluation, dated May 23, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is January 1, 2022, through December 31, 2025. This performance evaluation assesses the bank's performance for all products and services under the Large Bank CRA procedures for Lending, Investment, and Service Tests for the entirety of the evaluation period.

Lending Test

In evaluating lending performance, the OCC analyzed home mortgage loans that management reported under Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under CRA. At the bank's request, the OCC considered consumer loan products, which consist of secured and unsecured loans. Banks are not required to report data on consumer loans; therefore, no peer aggregate data was available to compare against consumer lending. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. The OCC did not include small loans to farms in this performance evaluation, as the bank's volume of such loans did not meet the threshold required for analysis.

Investment Test

When conducting analysis under the Investment Test, the OCC compared the dollar amount of CD investments and donations made to tier 1 capital. The analysis also included evaluating how responsive investments and donations were to the needs of the community and if there were any impediments to meeting those needs. The OCC considered the volume of investments made during the current evaluation period and those made in prior evaluation periods that remained outstanding. Investments made in prior periods were considered at the book value of the investment as of December 31, 2025. Current-period investments were considered at their original investment amount, even if that amount is greater than the current book value of the investment. Current-period investment totals are based on the amount used for bank reporting for financial statements and the Consolidated Reports of Condition and Income that governed the timing for recognizing investment totals. Unfunded commitments consist of legally binding investment commitments that are tracked and recorded in the bank's financial reporting system.

Service Test

The OCC gave primary consideration to the bank's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. The OCC focused on the accessibility of branches to low- and moderate-income (LMI) geographies and individuals, including the impact of opening and closing of branches. Adjacent branches, which are branches in middle- or upper-income (MUI) census tracts within proximity of LMI geographies, that serve and enhance accessibility for LMI customers, were also considered. The OCC evaluated the range and consistency of products and services offered by the bank through its branch network with emphasis on accessibility to LMI borrowers. The OCC specifically focused on any differences in branch hours and services in LMI geographies compared to those in MUI geographies. The OCC also evaluated the bank's record of providing CD services. The OCC's primary consideration was the responsiveness of the services to community needs.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state rating.

Under the Lending Test, the OCC considered both the number and dollar volume of loans to determine the weighting of loan products. In terms of the number of loans, small loans to businesses made up 84.0 percent of the total number of loans, compared to 11.9 percent for home mortgages and 4.0 percent for consumer loans. In terms of dollar volume, small loans to businesses constituted 49.9 percent of the total loan amount, while home mortgages accounted for 49.0 percent, and consumer loans made up 1.0 percent. As a result, the OCC gave greater weight to small loans to businesses and consumer loans were given less weight.

Generally, equal emphasis is given to the geographic distribution and borrower distribution of loans by income level. Greater weight was generally given to the bank's performance compared to aggregate lenders than to performance relative to demographic factors in lending, unless other performance context factors indicate greater consideration should be given to demographics. The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of businesses and individuals served.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national bank's or federal savings association's (collectively, bank's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 or any affiliate whose loans have been considered as part of this institution's lending performance 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: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending activity reflected excellent responsiveness to credit needs in its AA.
- The bank exhibited excellent geographic and an adequate borrower distribution of loans in its AA.
- The bank was a leader in making CD loans. The institution made extensive use of innovative and/or flexible lending practices to serve credit needs.
- The bank has an excellent level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- The service delivery systems are readily accessible to geographies and individuals of different income levels in its AA.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Illinois

HBT designated one AA in the state of Illinois, which is the Chicago-Naperville-Elgin MSA (Chicago MSA) in this evaluation. The AA consists of all DuPage County and portions of Cook County.

HBT's AA consists of 475 contiguous CTs. Of these 475 CTs, 19 (4 percent) are considered low-income, 94 (19.8 percent) are moderate-income, 190 (40 percent) are middle-income, 170 (35.8 percent) are upper-income, and two (0.4 percent) have not been assigned an income classification (NA).

The bank's branches are located in the cities of Burbank, Clarendon Hills, Countryside, Darien, Downers Grove, Elmhurst, Hinsdale, Lemont, Maywood, Oak Park, Riverside, Stone Park, Western Springs, and Willowbrook.

The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. Please refer to Appendix A for a description of AA.

Chicago MSA

The following table provides a summary of demographics, housing, and business information for the AA.

Assessment Area - Chicago MSA						
						2022 - 2025
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	475	4.00	19.79	40.00	35.79	0.42
Population by Geography	2,109,176	3.87	20.87	40.05	35.16	0.05
Housing Units by Geography	799,690	3.86	19.35	40.98	35.76	0.05
Owner-Occupied Housing by Geography	518,018	1.90	15.61	39.98	42.47	0.04
Occupied Rental Units by Geography	232,368	7.40	26.88	43.07	22.59	0.06
Vacant Units by Geography	49,304	7.81	23.20	41.62	27.27	0.10
Businesses by Geography	76,716	2.59	14.81	39.45	43.06	0.09
Farms by Geography	1,312	1.52	15.32	36.74	46.42	0.00
Family Distribution by Income Level	515,974	20.33	16.21	19.80	43.67	0.00
Household Distribution by Income Level	750,386	22.50	15.21	17.03	45.26	0.00
Unemployment rate (%)	5.18	11.25	6.63	5.00	4.01	15.13
Households Below Poverty Level (%)	8.99	25.07	14.18	8.63	5.04	23.71
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		$92,622			**Median Housing Value**	$268,000
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2025		$117,400			**Median Gross Rent**	$1,184
					Families Below Poverty Level	6.34

FFIEC File - 2020 Census
FFIEC File - 2024 Census
2025 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

As part of the CRA evaluation, the OCC reviewed two community contacts in the AA during the evaluation period, which included a grassroots community group that focuses on counseling, education, and housing resources to assist LMI families, and a civil rights and consumer protection group that seeks to expand financial service access for LMI individuals. Both groups identified affordable housing as a significant need within the AA, including subsidies for LMI individuals looking to purchase a home, as well as more flexible credit underwriting criteria to assist LMI borrowers that are also safe and sound for lenders. One group noted there was a need for more small-dollar lending options (loans less than $25,000) to small businesses within AA.

Housing Units

The Chicago MSA contains 799,690 housing units. Housing units located in LMI CTs account for 23.2 percent of the total housing stock. While owner-occupied units represent the majority of housing units overall, only 17.5 percent of these units are in LMI geographies. The limited supply of owner-occupied units in LMI areas may constrain homeownership opportunities for LMI households and influence the demand for affordable mortgage products.

Housing Affordability

Based on information in the demographic table provided above, low-income families within the Chicago MSA earned less than $4,892 monthly and moderate-income families earned less than $7,827 monthly. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This is calculated to be a maximum monthly mortgage payment of $1,468 for low-income borrowers and $2,348 for moderate-income borrowers. Assuming a 30-year mortgage with a six percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, the monthly mortgage payment for a home at the Chicago MSA median housing value would be $1,607. Low-income borrowers would face significant challenges in affording a mortgage loan in this AA.

Employment and Economic Factors

Unemployment rates in Cook and DuPage Counties improved following the pandemic but showed differing trends from 2022 through 2025. According to the U.S. Bureau of Labor Statistics, Cook County unemployment was relatively elevated in 2022 and then declined in 2023 before rising again. Annual average figures during the evaluation period show 5 percent in 2022, 4.5 percent in 2023, and 5.4 percent in 2024, with preliminary data in 2025 showing unemployment around 4.7 percent as of November 2025. In DuPage County, unemployment was lower overall, with annual averages of 3.7 percent in 2022, 3.5 percent in 2023, and 4.3 percent in 2024, and preliminary data suggesting a rate near 3.9 percent in November 2025. These changes reflect a strong recovery in employment through 2023, followed by moderate labor-market softening in 2024 and continued labor-market variability into 2025.

According to World Business Chicago, the City of Chicago Council Office of Financial Analysis, and the DuPage County Community Needs Assessment 2024, Cook and DuPage Counties are key economic engines of the Chicagoland region. Cook County supports a broad mix of industries including professional and business services, healthcare, finance, manufacturing, transportation, logistics, and a growing technology sector, employing over five million workers. DuPage County complements this with a highly educated workforce and a diversified economy anchored in healthcare, manufacturing, professional services, education, retail, and logistics. Together, the counties offer strong opportunities for CD and lending activities that support employment growth, small business formation, and workforce development in LMI communities, leveraging the region's economic diversity, labor pool, and innovation ecosystem.

Scope of Evaluation in the State of Illinois

The Chicago MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based on results of the full-scope area.

The OCC gave greater weight to small loans to businesses due to the high lending volume. Home mortgage loans received less weight than small loans to businesses but more weight than consumer loans. Consumer loans received the least weight due to the lower volume of lending.

For the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank's performance in moderate-income geographies due to the higher percentages of owner-occupied housing units and small businesses.

For the borrower distribution analysis of home mortgage loans, consideration was given to the impact that income and housing costs have on limiting homeownership opportunities of LMI individuals and families. Additionally, consideration was given to the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. It is difficult for many LMI borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualification. As such, more emphasis was placed on the bank's lending results to LMI borrowers relative to the aggregate performance rather than the demographic data.

For the borrower distribution analysis of loans to small businesses, the OCC considered the competitive market condition in the AA. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders nominally affects the bank's ability to make small loans to businesses. A meaningful portion of the bank's small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these loans were purchased from FIRST, for which revenue data was not provided, or they were originated under a loan product where business revenue is not considered in the underwriting process. The OCC considered the bank's prominent nationwide niche lending programs when evaluating its performance in lending within its AA compared to outside AA lending. More emphasis was placed on the bank's lending relative to aggregate performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the Lending Test in the state of Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs. Examiners considered the substantial volume of loans originated through an affiliate charter.

Table 3: Lending Activity								**2022 - 2025**
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Chicago MSA	518	3,654	2	61	176	4,411	99.24	100.00
Broader Statewide or Regional Area	0	0	0	34	0	34	0.76	0
Total	**518**	**3,654**	**2**	**95**	**176**	**4,445**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Chicago MSA	340,075	345,909	360	98,315	7,086	791,745	93.48	100.00
Broader Statewide or Regional Area	0	0	0	55,267	0	55,267	6.52	0
Total	**340,075**	**345,909**	**360**	**153,582**	**7,086**	**847,012**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2025 Bank Data.								
Due to rounding, totals may not equal 100.0%								

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC's June 30, 2025 Deposit Market Share report, HBT had $4.6 billion in deposits with a deposit market share of 0.9 percent. The bank's deposit market share ranked 15th out of 104 deposit taking institutions. HBT's deposit market share ranked in the top 15 percent of all deposit taking institutions within the Chicago MSA. The top five institutions by deposit market share were JP Morgan Chase Bank, NA, BMO Bank NA, CIBC Bank USA, Bank of America, NA, and The Northern Trust Company. These five institutions had a combined deposit market share of 65.0 percent.

According to 2024 peer mortgage data, HBT had a 0.3 percent market share of home mortgage originations. HBT's market share of home mortgage originations was weaker than its deposit market share. HBT's mortgage originations ranked 56th out of 584 home mortgage lenders. The bank's market share ranking of home mortgage loan originations, relative to all home mortgage lenders, was in the top 10 percent. The bank's market share ranking of home mortgage loan originations was stronger than its deposit market share. The top five home mortgage lenders by number of loans and market share were Guaranteed Rate, Inc., JP Morgan Chase Bank, NA, United Wholesale Mortgage, US Bank, N.A., and Huntington National Bank. These five lenders had a combined home mortgage loan market share of 23.1 percent.

According to 2023 peer small business data, HBT had a 0.5 percent market share of small business loan originations. HBT's market share of small business loan originations was weaker than its deposit market share. HBT's market share of small business loan originations ranked 19th out of 231 small business loan lenders. The bank's market share ranking of small business loan originations, relative to all small business lenders, was in the top 9 percent. The bank's market share ranking of small business loan originations was stronger than its deposit market share ranking. The top five small business lenders by number of loans and market share were JP Morgan Chase, N.A., American Express National Bank, Bank of America, N.A., Citibank, N.A., and Capital One N.A. These five lenders are all larger national banks with sizeable business credit card portfolios and had a combined small business loan market share of 73.8 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

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.

The geographic distribution of home mortgage loans was good. More emphasis was placed on the bank's lending relative to aggregate performance.

The bank's percentage of home mortgage loans in low-income geographies was near to the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

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.

The geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

Consumer Loans

Refer to Table 13 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of the bank's consumer loans was good.

The bank's percentage of consumer loans in low-income geographies exceeded the percentage of households in those geographies. The percentage of consumer loans in moderate-income geographies was near to the percentage of the households in those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any conspicuous lending gaps existed. We did not identify any conspicuous lending gaps inside the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

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.

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability mostly for low-income borrowers.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families but was below the aggregate distribution of loans.

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 origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of 24.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of $1 million or less was well below the percentage of businesses with gross annual revenues of $1 million or less but was near to the aggregate distribution of small loans to businesses.

Consumer Loans

Refer to Table 14 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans was excellent.

The bank's percentage of consumer loans to low-income borrowers exceeded the percentage of low-income households. The bank's percentage of consumer loans to moderate-income borrowers exceeded the percentage of moderate-income households.

Community Development Lending

The institution was a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans, that also qualify as CD loans.

The bank made 61 CD loans totaling $98.3 million in the AA, which represented 17 percent of the allocated Tier 1 capital. CD loans primarily supported affordable housing, community services to LMI individuals, economic development and revitalization and stabilization efforts. By dollar volume, 54.2 percent of these loans funded economic development, 33.1 percent funded community services targeted to LMI individuals and families, 10.7 percent funded affordable housing, and 2 percent funded revitalization and stabilization efforts. The bank's CD lending had a significantly positive impact on the Lending Test conclusion.

The following are examples of CD loans the bank originated in the AA:

- During the evaluation period, the bank originated seven SBA 504 loans totaling $21.4 million to three distinct borrowers within the AA. These loans facilitated the expansion of small businesses and contributed to the economic development of the area by creating job opportunities for LMI individuals.

- The bank originated a $2.1 million commercial mortgage for the acquisition of a mixed-use building located in a low-income CT. All 31 residential units are affordable, offering 1- and 2-bedroom options with rents set below HUD Fair Market Rents.

- The bank extended a $1.3 million working capital line of credit (LOC) to a nonprofit organization dedicated to transitioning individuals from housing crises to housing stability. This line of credit was annually renewed for an additional two years. The organization provides support, outreach, shelter, employment services, emergency aid, and housing for primarily LMI individuals and families.

- The bank has annually renewed a $50,000 revolving line of credit for three years for a nonprofit organization dedicated to providing affordable arts and fitness education to enrich the lives of children and families in LMI communities. This organization aims to strengthen the community by addressing issues such as drug activity, gang involvement, and teenage pregnancy by offering healthy after-school and weekend activities. The organization primarily serves low-income, under-served areas with high unemployment rates, with fully subsidized tuition.

Broader Statewide Regional CD Lending

Because HBT was responsive to CD needs and opportunities in its AA, examiners considered CD loans in the broader statewide and regional areas that include the bank's AA, but do not have a purpose, mandate, or function to specifically serve the AA. CD lending in the broader statewide and regional areas consisted of 34 loans totaling $55.3 million. These loans primarily supported economic development targeted to LMI areas and affordable housing. By dollar volume, $32.3 million (58.4 percent) funded economic development activities and $23 million (41.6 percent) funded affordable housing. CD loans in the broader statewide and regional areas supported the Lending Test conclusion.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. A summary of the bank's innovative and/or flexible loan products or programs are as follows:

Consumer Loan Program

Money Smart Everyday Small Dollar Loan is offered as an alternative to payday loans for LMI individuals. These loans provide unsecured financing from $500 to $5,000 with no fees, lower interest rates, and up to 24-month repayment terms. During the evaluation period, the bank originated/renewed 70 Money Smart Everyday loans in the AA totaling $195,300.

Money Smart Certificate of Deposit Secured Loan is offered to assist persons with derogatory credit or no credit history who are unable to qualify for traditional bank products. The loan proceeds are used to open a certificate of deposit which is then used to secure the loan. After payoff, customers receive use of the money from the certificate of deposit and benefit from positive reporting of credit history. Features of the loan include low loan amounts, no loan fees, low fixed rates, no required credit history, no required length of residency, and no required proof of income. During the evaluation period, the bank originated/renewed 46 Money Smart Certificate of Deposit loans in the AA totaling $52,200.

Small Business Loan Programs

Small Business Easy Access LOC was built specifically for businesses less than a year old and is designed to offer micro businesses short-term cash to support inventory growth and accounts receivable. The loan can be secured or unsecured to accommodate small businesses in a variety of stages and circumstances. The LOC is a flexible financing solution up to $10,000 at a variable rate lower than most credit cards, with additional tiers allowing loan amounts up to $250,000. During the evaluation period, the bank originated/renewed 490 Easy Access LOC loans in the AA totaling $27.8 million.

Small Business Easy Access Installment Loan is designed to offer micro businesses financing for acquisition of fixed assets or debt refinancing. The product includes tiers with loan amounts up to $250,000. There are also tiers available for unsecured loans in addition to loans secured by business assets. During the evaluation period, the bank originated/renewed 13 Easy Access Installment loans in the AA totaling $547,639.

HBT offers Small Business Overdraft Protection (ODP), a product designed to offer micro businesses a safety net for periods of short-term cash flow constraint. The products assist the businesses in limiting overdraft fees or returned check charges that may be imposed by a vendor or other party. There is no application, closing or annual fees for this product. The maximum commitment varies from $5,000 to $10,000. During the evaluation period, the bank originated 267 ODP lines in the AA totaling $983,199.

The bank participates in SBA programs including the 504-loan program, 7a loan program, and the Express program. During the evaluation period, a total of 59 loans totaling $40.6 million were originated in the AA under these programs.

Wintrust Community Bank Down Payment Program is a down payment and closing cost assistance program for LMI homebuyers funded jointly by the community bank charters under Wintrust Financial Corporation. The program helps LMI homebuyers achieve their dream of homeownership. The assistance is provided in $2,000 grants paid on behalf of the borrower at the time of closing on first mortgage financing for the home purchase and is fully forgiven at closing. Borrowers must have annual household income at or below 80 percent of HUD median income where the property is located. During the evaluation period the bank provided 382 grants totaling $764,000 in grants and paid $159,600 in combined administrative fees to the partner HUD approved counseling agencies.

The bank refers requests for purchases and refinances of residential mortgages to its affiliate WM. WM offers a wide array of innovative products. These products include a CRA Portfolio Product that is favorable to LMI applicants and features higher loan to value and lower credit score standards than traditional portfolio products. Aside from the CRA Portfolio Product, WM has various loan programs and products that are not reported by HBT; however, they do increase accessibility for their customers to innovative programs. These programs and products include the Illinois Housing Development Authority (IHDA) loan programs, the Fannie Mae HomeReady Mortgage Program, the Fannie Mae HomeReady First Special Purpose Credit Program, the Freddie Mac Home Possible Mortgage Program, the Freddie Mac BorrowSmart Special Purpose Credit Program, the No Customer Left Behind Program, the Federal Home Loan Bank of Chicago down payment programs, FHA loans, and VA loans.

INVESTMENT TEST

The bank's performance under the Investment Test in Chicago MSA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA was excellent.

The bank had an excellent level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*										2022-2025
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Chicago MSA	23	10,400	453	48,808	476	92.2	59,208	92.0	1	411
Broader Statewide or Regional Area	2	2,465	34	1,809	36	7.0	4,274	6.6	3	3,067
National	0	0	4	910	4	0.8	910	1.4	0	0
Total	25	12,865	491	51,527	516	100	64,392	100	4	3,478

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The dollar volume of current- and prior-period investments represented 10.3 percent of tier 1 capital. This did not include one unfunded commitment of $411,390, representing an additional 0.1 percent of tier 1 capital. HBT had 476 qualified investments and grants in the AA totaling $59.2 million. Of these qualified investments and grants, $31.6 million (53.4 percent) supported affordable housing, $12.4 million (20.9 percent) supported economic development activities, $12.3 million (20.8 percent) supported community services targeted to LMI individuals, and $2.9 million (4.8 percent) supported revitalization and stabilization efforts in LMI geographies.

The following are examples of qualified investments in the AA:

- The bank invested $1 million in a fund that supported the creation of stable and healthy communities through the development and financing of affordable housing. The proceeds were used to rehabilitate a 200-unit apartment complex, including 108 project-based section 8 units, 13 rental assistance demonstration program units, and 79 Low-Income Housing Tax Credit (LIHTC) units restricted to residents earning 30 to 80 percent of the area median income. Renovations included major systems, elevators, roofs, windows, doors, and standard unit upgrades, with $1 million set aside for tenant relocation during construction. The project maintained affordable housing for existing LMI tenants and enhanced living quality without displacing residents. This qualified investment provided updated, safe, and affordable housing opportunities to LMI individuals and families within the bank's AA.

- The bank invested $2.8 million in a New Markets Tax Credit that supported the creation of stable and healthy communities through the development and financing of a full-service grocery store. The proceeds were used to develop a 9,700-square-foot grocery store that was minority- and woman-owned, accepted SNAP and WIC, and provided affordable fresh food to over 40,000 LMI residents, including 31,800 residents in a USDA-designated Food Desert within one mile. The project created over 100 temporary jobs during construction and 30 permanent jobs after opening and was in a moderate-income CT where 29 percent of residents lived below the poverty line. This qualified investment increased access to essential goods for LMI residents within the bank's AA.

- The bank invested $5 million in a fund that supported the creation of stable and healthy communities through the development and financing of affordable housing. The proceeds were used to construct 42 LIHTC units, including 26 units with section 8 project-based vouchers and seven units providing permanent supportive housing for households with special needs or experiencing homelessness. The development provided non-age-restricted, high-quality affordable housing to LMI individuals and families within the bank's AA.

Examples of qualified grants in this AA include:

- The bank provided five grants totaling $406,633 to a nonprofit organization dedicated to offering no-cost and low-cost programs for children from LMI communities on Chicago's West Side. These programs provide access to high-quality recreation, development, and enrichment opportunities. The grants supported initiatives in youth development, community engagement, and the creation of long-term opportunities for children from LMI households.

- The bank provided ten grants totaling $71,400 to a nonprofit high school and study program that offered college preparatory education for youth whose families could not afford private education. The initiative operated a Corporate Work Study Program, in which students worked entry-level jobs five days a month to fund nearly 70 percent of tuition costs. All children were from LMI households, and many were Spanish-speaking, residing throughout the south and west sides of Chicago, including areas inside the bank's AA. The grants supported educational access, workforce experience, and long-term opportunities for children from LMI households.

- The bank provided three grants totaling $35,000 to a nonprofit community service organization offering permanent residency and supportive programs for adults with developmental disabilities. The organization operates three communal homes in the Chicagoland area, housing individuals who are all Medicaid recipients and therefore qualify as LMI. These grants help sustain essential services that improve quality of life and provide stable, affordable housing for this vulnerable population. The organization also holds expedited funding status with the state of Illinois and receives Medicaid waiver awards to support its ongoing operations.

<u>Broader Statewide Regional Qualified Investments</u>

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered investments in the broader statewide and regional areas that include the bank's AA but do not have a purpose, mandate, or function to specifically serve the AA.

These investments and grants in the broader statewide and regional areas amounted to approximately $4.3 million in total. During the current evaluation period, $1.8 million was invested in small business investment company funds and in MDIs and CDFIs that promoted economic development and provided loans for affordable housing. Additionally, the bank provided 29 grants totaling $147,512, including 27 grants for community services ($139,146), one grant for economic development ($8,333), and one grant for affordable housing ($33). The bank also had three unfunded commitments totaling approximately $3.1 million that, once funded, are expected to support additional economic development and community services activities.

Prior period investments in the regional area totaled approximately $2.5 million and included a loan pool investment of $1 million and a prior SBIC contribution of $1.5 million, both supporting economic development. Collectively, these qualified investments and grants enhanced access to credit, housing, and community services for LMI individuals and small businesses in the regional area and supported the Investment Test conclusion.

SERVICE TEST

The bank's performance under the Service Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Table 5: Distribution of Branch Delivery Systems														2022 - 2025
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Chicago MSA	100.00	16	100.00	6.25	12.50	12.50	68.75	0.00	3.87	20.87	40.05	35.16	0.05	
Total	100.00	16	100.00	6.25	12.50	12.50	68.75	0.00	3.87	20.87	40.05	35.16	0.05	
Source: FFIEC File - 2020, 2024 Census *1/1/2022 - 12/31/2025 Bank Data* *Due to rounding, totals may not equal 100.0%*														

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank operates 16 branches in the AA including one branch in a low-income geography and two branches in moderate-income geographies. The percentage of branches in low-income geographies exceeded the percentage of the population in those geographies. The percentage of branches in moderate-income geographies was below the percentage of the population in those geographies.

Examiners further considered MUI branches that enhanced access for LMI individuals or geographies within the AA. Examiners reviewed the data on accounts held at the MUI branches that were within one mile from LMI CTs and determined that one upper-income branch was serving one nearby moderate-income geography within the AA. This one MUI branch had a positive impact on the retail banking services conclusion.

HBT complements its traditional service delivery system with alternative delivery systems (ADS), which includes deposit-taking ATMs, online and mobile banking, telebanking, and electronic bill pay. Based on the bank provided data, 85.9 percent of the deposit accounts opened by HBT during the evaluation period in LMI CTs utilized online or mobile banking during the evaluation period. HBT had 19 deposit-taking ATMs, of which one was located in a low-income CT and three in moderate-income CTs within the AA. A new ATM was opened in a moderate-income CT during the evaluation period. Additionally, customers have access to all Wintrust ATMs, of which there are 19 located in low-income CTs and 44 in moderate-income CTs. The bank also offered flexible deposit products and retail services, including Money Smart Checking and Savings accounts. These ADS had a positive impact on the retail banking services conclusion.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Chicago MSA	1	0	0	0	0	1	0
Total	1	0	0	0	0	1	0
1/1/2022 - 12/31/2025 Bank Data.							

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened a branch in Oak Park in an upper-income CT in February 2022.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and individuals. Services offered and branch hours are comparable among locations regardless of the income level of the geography. All branches are open Monday through Friday from 9:00 AM to 5:00 PM, and on Saturdays from 9:00 AM to 1:00 PM. Also, all but three of the branches have a drive-up open the same hours as the lobby. The three branches without drive-ups are located in busy downtown areas in strip malls with no opportunity for a drive-up location.

Community Development Services

The bank was a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 76 bank employees from various lines of business partnered with 29 organizations and contributed a total of 9,427 hours supporting LMI individuals and families in the AA. This included employees holding leadership positions as Board or committee members for 27 organizations that promote affordable housing, home ownership education, community services, technical assistance to small businesses, economic developments, and financial education to LMI communities and individuals within the AA.

The following are examples of CD services provided in the AA:

- One employee served 720 hours as a Board Member and Treasurer for a nonprofit organization that provides emergency support for LMI individuals including a free food pantry and clothing closet, transportation for medical services, and financial assistance for rent/mortgage, utilities, and car repairs.

- One employee served 498 hours as a Board Member and Finance Committee Member for a nonprofit organization that helps to transition people from housing crisis to a permanent and stable home in their local community.

- Two employees served a cumulative 192 hours as Board Members for a nonprofit organization that helps support and aid LMI individuals and families by assisting with food, transportation, medical, and housing needs as well as providing budgeting counseling services and job coaching.

FDIC Money Smart Program

The bank utilizes the FDIC Money Smart program to educate individuals throughout the community on the benefits of financial literacy. Employees at the bank have two different types of modules at their disposal for two different types of audiences. Small Business modules teach aspiring entrepreneurs and small business owners about practical topics necessary to start and own a small business, including risk management, tax planning and reporting, and financial management. Consumer modules teach LMI individuals in the community about personal financial literacy topics, including how to handle identity theft, budgeting, and investing. During the evaluation period, employees provided 882 hours of financial education to small businesses and LMI individuals and students from LMI families in the AA.

Cristo Rey Work Study Program

The bank participates in the Cristo Rey St. Martin Corporate Work Study (CWS) program, an innovative national model that integrates professional work experience with a rigorous college preparatory education for students from LMI families. Cristo Rey's mission is to partner with educators, businesses, and communities to enable students to fulfill their aspirations for a lifetime of success. Through the CWS program, Cristo Rey St. Martin students are employed in entry-level professional roles one full day per week throughout the academic year. The school manages all administrative aspects of employment, including the partnerships with corporate partners (such as HBT) which helps fund students' education and allows them to finance most of their tuition costs. Participation in the CWS program offers students valuable professional experience, helps build self-confidence, and reinforces the relevance of their education. Seven bank employees provided 5,006 hours as student mentors for the work study program. The majority of the hours represented the duration of time the students spent on-the-job with their mentors at the bank.

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:	01/01/2022 to 12/31/2025	
Bank Products Reviewed:	Home Mortgage, small business, and consumer loans. Community Development loans, qualified investments, and community development services.	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State of Illinois		
Chicago MSA	Full-scope	Cook (partially) and DuPage Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Rating
Hinsdale Bank and Trust, N.A.	Outstanding	Outstanding	Outstanding	Outstanding
State:				
State of Illinois	Outstanding	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

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/assessment area.

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 the 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 low- and moderate-income 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): 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 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

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/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. 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 loans are treated the same 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 13. Assessment Area Distribution of Consumer 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 households in those geographies.

Table 14. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/AA.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography — 2022 - 2025

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
Chicago MSA 2025	518	340,075	100.00	123,374	1.90	1.74	1.79	15.61	11.39	14.12	39.98	19.31	40.00	42.47	67.57	44.07	0.04	0	0.02
Total	**518**	**340,075**	**100.00**	**123,374**	**1.90**	**1.74**	**1.79**	**15.61**	**11.39**	**14.12**	**39.98**	**19.31**	**40.00**	**42.47**	**67.57**	**44.07**	**0.04**	0	**0.02**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2025 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "0" 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 - 2025

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
Chicago MSA 2025	518	340,075	100.00	123,374	20.33	5.41	7.41	16.21	15.06	20.48	19.80	8.88	22.08	43.67	53.86	34.21	0	16.80	15.83
Total	**518**	**340,075**	**100.00**	**123,374**	**20.33**	**5.41**	**7.41**	**16.21**	**15.06**	**20.48**	**19.80**	**8.88**	**22.08**	**43.67**	**53.86**	**34.21**	0	**16.80**	**15.83**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2025 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "0" 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 - 2025

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
Chicago MSA 2025	3,654	345,909	100.00	199,498	2.59	2.96	2.14	14.81	16.06	15.13	39.45	38.53	41.59	43.06	42.42	41.06	0.09	0.03	0.08
Total	**3,654**	**345,909**	**100.00**	**199,498**	**2.59**	**2.96**	**2.14**	**14.81**	**16.06**	**15.13**	**39.45**	**38.53**	**41.59**	**43.06**	**42.42**	**41.06**	**0.09**	**0.03**	**0.08**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "0" 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 - 2025

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
Chicago MSA 2025	3,654	345,909	100.00	199,498	84.61	51.23	55.24	5.83	23.92	9.55	24.85
Total	**3,654**	**345,909**	**100.00**	**199,498**	**84.61**	**51.23**	**55.24**	**5.83**	**23.92**	**9.55**	**24.85**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "0" data not available.
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography — 2022 - 2025

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MSA 2025	176	7,086	100.00	3.60	7.39	19.10	16.48	40.93	26.70	36.32	49.43	0.05	0
Total	**176**	**7,086**	**100.00**	**3.60**	**7.39**	**19.10**	**16.48**	**40.93**	**26.70**	**36.32**	**49.43**	**0.05**	0

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2025 Bank Data, "0" data not available Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower — 2022 - 2025

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MSA 2025	176	7,086	100.00	22.50	57.95	15.21	17.05	17.03	11.93	45.26	13.07	0	0
Total	**176**	**7,086**	**100.00**	**22.50**	**57.95**	**15.21**	**17.05**	**17.03**	**11.93**	**45.26**	**13.07**	0	0

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2025 Bank Data, "0" data not available.
Due to rounding, totals may not equal 100.0%