



## **PUBLIC DISCLOSURE**

June 3, 2024

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Barrington Bank and Trust, National Association  
Charter Number: 23216

201 South Hough Street  
Barrington, IL 60010

Office of the Comptroller of the Currency

Midsize and Trust Bank Supervision  
425 S. Financial Place, Suite 1700  
Chicago, IL 60605

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.

**Table of Contents**

Overall CRA Rating..... 3  
Description of Institution ..... 4  
Scope of the Evaluation ..... 6  
Discriminatory or Other Illegal Credit Practices Review ..... 8  
State Rating..... 9  
    State of Illinois..... 9

Appendix A: Scope of Examination.....A-1  
Appendix B: Summary of MMSA and State Ratings.....B-1  
Appendix C: Definitions and Common Abbreviations.....C-1  
Appendix D: Tables of Performance Data.....D-1

## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated Outstanding.

The following table indicates the performance level of Barrington Bank and Trust, National Association (BBT or bank) with respect to the Lending, Investment, and Service Tests:

| Performance Levels        | Barrington Bank and Trust<br>Performance Tests |                 |              |
|---------------------------|--|-----------------|--------------|
|                           | Lending Test*                                  | Investment Test | Service Test |
| Outstanding               | X  |                 | X            |
| High Satisfactory         |  | X               |              |
| 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 geographical and borrower distribution of loans. The bank is a leader in making Community Development (CD) loans. The makes extensive use of innovative and flexible products to serve the credit needs of its AA.
- The Investment Test rating is based on a good responsiveness to credit and community economic development needs through the origination of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The Service Test rating is based on service delivery systems that were readily accessible to geographies and individuals of different income levels. The bank is a leader in providing CD services.

## Lending in Assessment Area

A very small percentage of the bank’s loans are in its AA.

The bank originated and purchased 3.3 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.

| <b>Lending Inside and Outside of the Assessment Area – January 1, 2021, through December 31, 2023</b> |                 |      |         |      |         |                                 |     |            |      |                |
|---|-----------------|------|---------|------|---------|---------------------------------|-----|------------|------|----------------|
| Loan Category   | Number of Loans |      |         |      | Total # | Dollar Amount of Loans \$(000s) |     |            |      | Total \$(000s) |
|   | Inside          |      | Outside |      |         | Inside                          |     | Outside    |      |                |
|   | #               | %    | #       | %    |         | \$                              | %   | \$         | %    |                |
| Home Mortgage   | 1,081           | 2.6  | 40,032  | 97.4 | 41,113  | 337,035                         | 2.9 | 11,457,760 | 97.1 | 11,794,795     |
| Small Business  | 1,415           | 3.8  | 36,219  | 96.2 | 37,634  | 120,863                         | 7.1 | 1,579,894  | 92.9 | 1,700,757      |
| Consumer  | 77              | 72.0 | 30      | 28.0 | 107     | 214                             | 5.7 | 3,508      | 94.3 | 3,722          |
| Total   | 2,573           | 3.3  | 76,281  | 96.7 | 78,854  | 458,112                         | 3.4 | 13,041,162 | 96.6 | 13,499,274     |

Nationwide lending programs used by the bank impact the ratio of loans located inside the bank's AA. BBT's affiliate, Wintrust Mortgage (WM), has a nationwide presence, which results in a significant number of loans being originated outside the bank's AA. Refer to the Description of the Institution narrative below for more details relating to WM lending. Home mortgage and small business loans are the bank's primary products based on volume of loans by number. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

## Description of Institution

BBT is a \$4.0 billion interstate bank headquartered in Barrington, Illinois. BBT is a wholly-owned subsidiary of Wintrust Financial Corporation (WTFC). As of December 31, 2023, WTFC is a \$56.3 billion financial services holding company located in Rosemont, Illinois. WTFC's business strategy includes working with customers in the Chicago metropolitan area, southern Wisconsin, northwest Indiana, and southwest Florida by way of their 15 wholly-owned banking subsidiaries and 176 bank locations.

WTFC locations provide a wide range of lending and deposit products and services to their customers. WTFC residential mortgage applications are referred to WM, which offers a wide variety of retail mortgages and originates nearly all WTFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 15 WTFC banks for their portfolio.

WTFC 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 Insurance Funding (FIRST), lease financing, short-term account receivable financing, administrative services, franchise lending, firm partnership loans, and financial solutions for mission-based organizations. Aside from WM, BBT has a commercial niche specialty division, Community Advantage (CA). CA provides financial services to condominiums, townhomes, and homeowners' associations. Most of the CA loans are in the greater Chicagoland area; however, CA loans are made nationwide.

As of December 31, 2023, BBT reported total loans of \$3.0 billion, representing 75.7 percent of total assets. BBT has three primary loan types that make up 85 percent of the total loan portfolio. The primary loan products include \$848 million of one-to four-family residential loans or 28 percent of total loans, \$1.2 billion of commercial loans or 40 percent of total loans, and \$509 million consumer loans or 17 percent of the total loan portfolio. BBT had tier 1 capital of \$416 million.

The bank has one rating area, Illinois, and one AA, which consists of a portion of the Chicago Naperville combined statistical area (CSA). The bank operates eight full-service locations and 11 deposit-taking Automated Teller Machines (ATMs). BBT has not opened or closed any branches since our last Public Evaluation. According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, BBT had 0.45 percent market share making it the 26th largest deposit holder out of 422 financial institutions in the state of Illinois.

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. BBT's CRA performance was rated "Outstanding" in the last Public Evaluation dated June 7, 2021.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The entire evaluation period for the exam is January 1, 2021 through December 31, 2023. 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.

In evaluating lending performance, the OCC analyzed home mortgage loans that management reported under Home Mortgage Disclosure Act (HMDA) and small business loans 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 consider small farm loans, as the bank did not originate any small farm loans throughout the evaluation period.

For the Lending Test, there are two analysis periods considered for this evaluation when analyzing geographical and borrower distribution of loans. The split analysis periods are due to updates in the U.S. Census 2015 American Community Survey (ACS) to the 2020 U.S. Census. The updates to the Census information changes the demographic and aggregate comparators for geographic and borrower distribution of loans, thus split analysis periods are needed to accurately assess performance in these two Lending Test components. The analysis periods for geographical and borrower distribution of loans are January 1, 2021 through December 31, 2021, and January 1, 2022 through December 31, 2023. Performance Tables O, P, Q, R, U, and V in Appendix D reflect data covered by the split analysis periods.

We also evaluated qualified investments as well as retail and CD services from January 1, 2021 through December 31, 2023.

### 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), or CSA are combined and evaluated as a single AA. These combined AAs will be evaluated as full 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 based on the state rating in Illinois.

Refer to the Scope section under the State Rating section for details regarding how the area was weighted in arriving at the respective ratings.

In evaluating performance under the Lending Test, we placed equal weight on the bank's distribution of home mortgage and small business loans based on the loan origination volume. Consumer loans received less weight due to the volume.

Generally, equal emphasis is given to the geographic distribution and borrower distribution of loans by income level. Greater weight was generally given to performance compared to aggregate lenders than to performance relative to demographic factors in lending. 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.

In performing the analysis of investments, we considered the high level of competition in the AA when formulating our conclusion. Specifically, many large interstate, regional, and community banks compete for qualified investments in the market.

The Service Test includes an evaluation of the availability and effectiveness of a bank's systems for delivering retail banking services, including the current distribution of the bank's branches among different income geographies.

The state ratings are based on performance in the bank-only AA. Refer to the Scope section under each State and MSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c), in determining a national bank's or federal savings association'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 the 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

|  |                   |
|--|-------------------|
| <b>CRA rating for the State of Illinois:</b> | Outstanding       |
| <b>The Lending Test is rated:</b>            | Outstanding       |
| <b>The Investment Test is rated:</b>         | High Satisfactory |
| <b>The Service Test is rated:</b>            | Outstanding       |

The major factors that support this rating include:

- Lending activity reflects good responsiveness to credit needs in its AA.
- The bank exhibits an excellent geographic and borrower distribution of loans in its AA.
- The bank is a leader in making CD loans. The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs.
- The institution has a good level of qualified CD investment and grants, occasionally in a leadership position.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.
- The bank is a leader in providing CD services.

### Description of Institution's Operations in Illinois

BBT designated one AA in Illinois, which is the Chicago-Naperville, IL CSA (Chicago CSA). The Chicago CSA consists of two MSAs, which were combined for analysis purposes. These MSAs are the Chicago-Naperville-Elgin MSA and Lake County-Kenosha County, IL-WI MSA. The Chicago Naperville-Elgin MSA consists of Cook County, and the Lake County-Kenosha County, IL-WI MSA consists of Lake County.

BBT's AA consists of 88 contiguous census tracts (CTs) located in the northwestern portion of Cook County, Illinois (75 CTs) and the southwestern portion of Lake County, Illinois (13 CTs). The AA is comprised of six townships, including Barrington, Palatine, Schaumburg, and Hanover (*part of Cook County*) as well as Ela and Cuba (*part of Lake County*).

The AA meets the requirement of the regulation and does not arbitrarily exclude low- and/or moderate-income (LMI) geographies. According to 2020 U.S. Census data, the AA consists of 88 CTs, of which there is one low-income tract and 10 moderate-income tracts in the AA.

#### *Economic Analysis*

According to the 2020 U.S. Census, Cook County has a population of approximately 5.3 million, of which 8.0 percent of individuals live below the poverty level (compared to 11.9 percent for Illinois). Banking competition in Cook County is high with 100 banks operating 1,167 banking offices as of June 30, 2023. With \$579.5 million in deposits in Cook County alone, BBT ranked 40<sup>th</sup> with a 1.9 percent deposit market share. The top three banks with the largest market shares in Cook County are JPMorgan Chase Bank, BMO Harris Bank, and Bank of America; these banks comprise an aggregated 53.1 percent market share. According to the 2020 U.S. Census, the leading industries in Cook County are Educational Services, Healthcare, and Social Assistance, representing 22.9 percent of the market. Unemployment has improved over the evaluation period in Cook County. According to the Federal Reserve's Economic Data (FRED), the unemployment rate in Cook County at the end of the evaluation period on December 31, 2023 was 4.0 percent (Illinois: 4.7 percent), which is a decline from 8.6 percent (Illinois: 7.2 percent) at the beginning of the evaluation period on January 1, 2021.

According to the 2020 U.S. Census, Lake County has a population of approximately 714,342, of which 13.6 percent of individuals live below the poverty level (compared to 11.9 percent for Illinois). Banking competition in Lake County is high with 31 banks operating 159 banking offices as of June 30, 2023. With \$2.4 billion in deposits in Lake County alone, BBT ranked fourth with a 7.8 percent deposit market share. The top three banks with the largest market shares in Lake County are JPMorgan Chase Bank, Lake Forest Bank & Trust (affiliate), and Old National Bank; these banks comprise an aggregated 44.8 percent deposit market share. According to the 2020 U.S. Census, the leading industries in Lake County area are Educational Services, Healthcare, and Social Assistance, representing 22.5 percent of the market. Unemployment has improved over the evaluation period in Lake County. According to the FRED, as of December 31, 2023, the unemployment rate in Lake County at the end of the evaluation period was 5.1 percent (Illinois: 4.7 percent), which is a decline from 7.5 percent (Illinois: 7.2 percent) at the beginning of the evaluation period.

Banking competition is high overall in Cook County and Lake County with 105 banks operating 1,326 banking offices across the two counties as of June 30, 2023. With its nine branch locations and \$3.0 billion in deposits across Cook County and Lake County, BBT ranked 17<sup>th</sup> with a 0.7 percent deposit market share. Between both counties, the top three banks with the largest market shares are JPMorgan Chase Bank, BMO Harris Bank, and Bank of America; these banks comprise an aggregated 51.2 percent deposit market share.

#### *Housing Affordability Analysis*

According to Table A, the median housing value of owner-occupied housing units for the Chicago CSA was \$281,306 for 2021 (2015 ACS) and \$307,683 for 2022 through 2023 (2020 U.S. Census). Based on this data, housing values increased 9.4 percent over the evaluation period. See below for details of the housing affordability analysis the OCC completed for the Chicago-Naperville-Elgin MSA, which contains 85.2 percent of the AA's CTs. Based on federal guidelines, low-income is defined as 50 percent or less of the median family income (MFI) for an area, while moderate-income is defined as 50 percent to 80 percent of the MFI for an area.

Based on data from the 2020 U.S. Census, covering 2022 through 2023, low-income families earned less than \$3,859 and moderate-income families earned less than \$6,174 monthly. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of 30.0 percent (a reasonable debt-to-income ratio) of the applicant's monthly income, resulting in a maximum monthly mortgage payment of \$1,157 for low-income borrowers and \$1,852 for moderate-income

borrowers. Assuming a 30-year mortgage with a 5.0 percent fixed interest rate, and excluding a down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the CSA median housing value would have been \$1,651. Based on this data, we concluded that a low-income family would struggle to qualify for a home mortgage based on the median family income and median home value in the Chicago CSA from 2022 through 2023. Some moderate-income families may struggle to qualify as well. *Reference Table A for demographic data for 2022-2023.*

Based on data from the 2015 ACS covering 2021 in the Chicago CSA, low-income families earned less than \$3,126 and moderate-income families earned less than \$5,001 monthly. Using 30.0 percent as a reasonable debt-to-income ratio, we calculated a maximum monthly mortgage payment of \$937 for low-income borrowers and \$1,500 for moderate-income borrowers. Assuming a 30-year mortgage with a 5.0 percent fixed interest rate, and excluding a down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Chicago CSA median housing value would have been \$1,510. Based on this data, we concluded that home mortgage loans were not affordable to low-income borrowers in the AA, with moderate-income borrowers likely to struggle as well. *Reference Table A for demographic data for 2021.*

We considered the poverty level across the AA in evaluating lending performance. Families living below the state poverty threshold, identified as having difficulty meeting basic financial needs, are less likely to have adequate financial resources to qualify for a home loan compared to those above the poverty line.

As part of the CRA Evaluation, the OCC held discussions with an affordable housing organization to determine local economic conditions and community needs. According to this community contact, affordable housing is a need throughout the Chicago metropolitan area. This community contact stated that banks should be more diligent and flexible and tailor loans to match neighborhood needs related to the age of the housing stock and needs of the residents.

We also utilized a contact from a local Community Development Financial Institution (CDFI) that provides financing and technical assistance for community stabilization and development that benefit low- to moderate-income neighborhoods, families, and individuals in metropolitan Chicago. The contact stated the closure of many larger big box stores had a devastating impact on several communities of Chicago. The contact stated that banking services and products are available to individuals; but many individuals have part-time employment, and their income hinders the ability to qualify for a loan.

| <b>Table A – Demographic Information of the Assessment Area</b> |          |                  |                       |                     |                    |                  |
|---|----------|------------------|-----------------------|---------------------|--------------------|------------------|
| <b>Assessment Area: Chicago CSA 2022-2023</b>                   |          |                  |                       |                     |                    |                  |
| <b>Demographic Characteristics</b>                              | <b>#</b> | <b>Low % of#</b> | <b>Moderate % of#</b> | <b>Middle % of#</b> | <b>Upper % of#</b> | <b>NA* % of#</b> |
| Geographies (Census Tracts)                                     | 88       | 1.1              | 11.4                  | 42.0                | 45.5               | 0.0              |
| Population by Geography   | 432,919  | 0.8              | 9.5                   | 45.1                | 44.6               | 0.0              |
| Housing Units by Geography                                      | 160,963  | 0.7              | 8.8                   | 46.4                | 44.1               | 0.0              |
| Owner-Occupied Units by Geography                               | 113,980  | 0.6              | 6.2                   | 43.6                | 49.6               | 0.0              |
| Occupied Rental Units by Geography                              | 39,482   | 1.2              | 16.6                  | 54.3                | 27.9               | 0.0              |

|  |         |           |                              |      |      |           |
|--|---------|-----------|------------------------------|------|------|-----------|
| Vacant Units by Geography  | 7,501   | 0.0       | 8.6                          | 46.6 | 44.8 | 0.0       |
| Businesses by Geography  | 56,708  | 0.6       | 6.0                          | 45.7 | 47.7 | 0.0       |
| Farms by Geography   | 864     | 0.2       | 7.9                          | 35.9 | 56.0 | 0.0       |
| Family Distribution by Income Level  | 110,386 | 15.2      | 15.7                         | 21.3 | 47.7 | 0.0       |
| Household Distribution by Income Level   | 153,462 | 16.3      | 14.2                         | 18.3 | 51.3 | 0.0       |
| Median Family Income MSA - 16984<br>Chicago-Naperville-Elgin, IL   |         | \$92,622  | Median Housing Value         |      |      | \$307,683 |
| Median Family Income MSA - 29404<br>County-Kenosha County, IL-WI   | Lake    | \$105,876 | Median Gross Rent            |      |      | \$1,397   |
|  |         |           | Families Below Poverty Level |      |      | 4.5%      |
| <i>Source: 2020 U.S. Census and 2023 D&amp;B Data<br/>                 Due to rounding, totals may not equal 100.0%<br/>                 (*) The NA category consists of geographies that have not been assigned an income classification.</i> |         |           |                              |      |      |           |

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                   |                              |                      |                     |                   |
|--|----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| <b>Assessment Area: Chicago CSA 2021</b>   |          |                   |                              |                      |                     |                   |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low % of #</b> | <b>Moderate % of #</b>       | <b>Middle % of #</b> | <b>Upper % of #</b> | <b>NA* % of #</b> |
| Geographies (Census Tracts)  | 80       | 0.0               | 10.0                         | 33.8                 | 56.3                | 0.0               |
| Population by Geography  | 427,299  | 0.0               | 9.2                          | 34.5                 | 56.3                | 0.0               |
| Housing Units by Geography   | 161,306  | 0.0               | 8.5                          | 35.0                 | 56.5                | 0.0               |
| Owner-Occupied Units by Geography  | 115,211  | 0.0               | 4.7                          | 32.0                 | 63.3                | 0.0               |
| Occupied Rental Units by Geography   | 37,107   | 0.0               | 19.3                         | 42.9                 | 37.8                | 0.0               |
| Vacant Units by Geography  | 8,988    | 0.0               | 12.1                         | 41.1                 | 46.8                | 0.0               |
| Businesses by Geography  | 39,056   | 0.0               | 13.5                         | 25.4                 | 61.2                | 0.0               |
| Farms by Geography   | 627      | 0.0               | 8.5                          | 23.9                 | 67.6                | 0.0               |
| Family Distribution by Income Level  | 110,181  | 13.3              | 14.5                         | 20.0                 | 52.3                | 0.0               |
| Household Distribution by Income Level   | 152,318  | 15.2              | 13.1                         | 17.7                 | 54.0                | 0.0               |
| Median Family Income MSA - 16984<br>Chicago-Naperville-Elgin, IL   |          | \$75,024          | Median Housing Value         |                      |                     | \$281,306         |
| Median Family Income MSA - 29404<br>County-Kenosha County, IL-WI   | Lake     | \$87,137          | Median Gross Rent            |                      |                     | \$1,208           |
|  |          |                   | Families Below Poverty Level |                      |                     | 5.0%              |
| <i>Source: 2015 ACS and 2021 D&amp;B Data<br/>                 Due to rounding, totals may not equal 100.0%<br/>                 (*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                   |                              |                      |                     |                   |

## **Scope of Evaluation in Illinois**

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

In evaluating performance under the Lending Test, we placed equal weight on the bank's distribution of home mortgage and small business loans based on the volume. Consumer loans received less weight due to the volume.

For the borrower distribution analysis, consideration was given to the impact that income and housing costs have on limiting home ownership opportunities of LMI individuals and families. In 2021, there were no low-income geographies in the bank's AA. The 2020 U.S. Census added one low-income tract to the bank's AA in 2022, which represents 1.1 percent of the total geographies within the AA. 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 geographics. 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 performance to LMI borrowers related to the aggregate performance rather than the demographic data.

For the borrower distribution of loans to small businesses, we 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 significant 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 acquired by FIRST and for which revenue data was not provided, or the loans were originated under a loan product for which the business revenue is not considered in underwriting. We took into consideration the bank's significant nationwide niche lending programs when assessing the bank's performance regarding lending within its AA versus 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 Illinois is rated Outstanding.

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

### **Lending Activity**

Lending levels reflect good responsiveness to AA credit needs. The bank's market share ranking for originating home mortgage loans in the AA is higher than the bank's ranking in deposits in the AA.

| Number of Loans* |               |                |          |                       |       |              |                 |
|------------------|---------------|----------------|----------|-----------------------|-------|--------------|-----------------|
| Assessment Area  | Home Mortgage | Small Business | Consumer | Community Development | Total | %State Loans | %State Deposits |
| Chicago CSA      | 1,081         | 1,415          | 77       | 16                    | 2,589 | 100.0        | 100.0           |

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

| Dollar Volume of Loans* |               |                |          |                       |           |         |                 |
|-------------------------|---------------|----------------|----------|-----------------------|-----------|---------|-----------------|
| Assessment Area         | Home Mortgage | Small Business | Consumer | Community Development | Total     | %State* | %State Deposits |
| Chicago CSA             | \$337,035     | \$120,863      | \$214    | \$16,674              | \$474,786 | 100.0   | 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 Deposit Market Share data as of June 30, 2023, the bank had \$3.0 billion in deposits, which ranked 17<sup>th</sup> out of 105 financial institutions (top 16.2 percent) in the Chicago CSA with a deposit market share of 0.7 percent. Examiners determined lending activity responsiveness in each AA by comparing the bank's market rank percentage for deposits to each lending product's market rank percentage. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA.

According to 2022 peer mortgage data, the bank ranked 12<sup>th</sup> in the market of 417 home mortgage lenders (top 2.8 percent), originating 225 loans with a market share of 1.8 percent. The bank's rank and market share in loans is stronger than the rank in deposits and market share.

According to 2022 peer small business data, the bank had a 0.3 market share of small business loan originations. The bank's market share of small business loan originations was well below its deposit market share. The bank's market share of small business loan originations ranked 28<sup>th</sup> out of 237 small business lenders. The bank's market share ranking was in the top 11.8 percent of all small business lenders.

## Distribution of Loans by Income Level of the Geography

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

### *Home Mortgage Loans*

Refer to Table O 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 is excellent. In 2022 and 2023, the proportion of home mortgage loans in low-income CTs was near to the percentage of owner-occupied housing and approximated the aggregate industry distribution of home mortgage loans to those geographies; the

proportion of mortgage loans in moderate-income CTs exceeded the percentage of owner-occupied housing and near to the aggregate industry distribution. Performance in 2021 was stronger than performance in 2022 through 2023; the bank's proportion of home mortgage loans in moderate-income CTs was near to the percentage of owner-occupied housing and exceeded the aggregate distribution.

### ***Small Loans to Businesses***

Refer to Table Q 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 is excellent. In 2022 and 2023, the proportion of bank small business loans in low-income CTs significantly exceeded the percentage of businesses and the aggregate industry distribution of small business loans to those geographies. The proportion of bank loans in moderate-income CTs exceeded the percentage of businesses and approximated the aggregate industry distribution of small business loans to those geographies. Performance in 2021 exceeded performance in 2022 through 2023. Performance in 2021 was stronger than performance in 2022-2023.

### ***Consumer Loans***

Refer to Table U 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 consumer loans is adequate. In 2022 and 2023, the proportion of bank consumer loans in moderate-income CTs significantly exceeded the percentage of households in those geographies. Performance in 2021 was weaker compared to performance in 2022 through 2023, as the proportion of bank consumer loans in moderate-income CTs was below the percentage of households in those geographies. However, the bank did not originate or purchase any consumer loans to households in low-income CTs during the evaluation period.

### ***Lending Gap Analysis***

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

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

### ***Home Mortgage Loans***

Refer to Table P 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 high cost of housing and slower market conditions due to the COVID-19 pandemic during the evaluation period limited the bank's ability to make home mortgage loans to LMI borrowers.

The borrower distribution of home mortgage loans is excellent. In 2022 and 2023, the proportion of bank home mortgage loans to low-income borrowers was below the percentage of low-income families and below the aggregate industry distribution of home mortgage loans to those borrowers; the proportion of bank home mortgage loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. Performance in 2021 was consistent with performance in 2022 through 2023.

### ***Small Loans to Businesses***

Refer to Table R 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 borrower distribution of small loans to businesses was excellent. When determining our conclusions, we considered the percentage of bank small business loans that did not include revenue information throughout the evaluation period. In 2022 and 2023, the proportion of bank small loans to businesses was below the percentage of businesses with revenues less than \$1.0 million and exceeded the aggregate industry distribution of loans to those businesses. Bank performance in 2021 was stronger than performance in 2022 and 2023 due to the bank's loans representing a larger percentage of businesses as compared to the demographic, thus having a positive impact on our conclusions.

### ***Consumer Loans***

Refer to Table V 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. In 2022 and 2023, the proportion of bank consumer loans to LMI borrowers exceeded the percentage of LMI households. Bank performance in 2021 was consistent with performance in 2022 through 2023.

### **Community Development Lending**

The institution is a leader in making CD loans. CD loans had a positive impact on Lending Test conclusions.

The Lending Activity Tables, shown above, set forth 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.

BBT made 38 CD loans totaling \$38.9 million, which represented 9.4 percent of tier 1 capital. The bank's CD lending consisted of 16 CD loans totaling \$16.7 million made in the bank's AA and 22 CD loans totaling 22.2 million made in the broader regional area that included the bank's AA. CD loans primarily supported affordable housing, community services, and revitalization or stabilization of LMI geographies.



The following are examples of bank CD loans:

- BBT originated a \$4.0 million commercial mortgage, through its CA Program, to a condominium association that has a total of 357 units with an average market value of approximately \$143,000 (46.5 percent of the median housing value within the AA), which benefitted LMI renters. The financing supported the repairs to the HVAC system, mason work, and repairs needed on the garage. The financing preserved affordable housing in the local community as most units' monthly mortgage payments are well below the CSA median rent standard.
- BBT made seven Paycheck Protection Program (PPP) loans that qualified as CD loans totaling \$11.9 million. The PPP loans supported small businesses and nonprofit organizations impacted by the Covid-19 pandemic.
- BBT originated a \$1.5 million commercial mortgage that supported a small business in a moderate-income tract within its AA. The business purchased a new property to expand and enhance the productivity of its employees. The business received a 6B Tax Incentive from Cook County for the purchase of the property as it was in a designated area for new development, significant rehab, or an abandoned building.
- BBT issued a \$1.0 million renewable line of credit (LOC) to a nonprofit organization that provides opportunities for quality affordable homeownership to low- and moderate-income individuals and families throughout Northern Illinois area. The services provided are down payment assistance (DPA) program, housing counseling, and construction rehab services. The organization acquires and rehabilitates distressed housing as part of a neighborhood stabilization strategy, with a goal of turning properties into affordable housing opportunities.

## **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. We considered the loan programs which provided opportunities with direct benefit to LMI borrowers and small businesses within the AA. Products used have a positive impact on the Lending Test conclusion for the Chicago CSA.

The following are examples of some of the bank's innovative and flexible loan products:

### *Down Payment Assistance*

BBT works in conjunction with several housing agencies across the AA to offer affordable housing assistance programs to first time homebuyers. These affordable loan products are offered under the agency's programs, which may include DPA, closing cost assistance, and tax credits. A DPA is a second mortgage loan and is subordinate to the first mortgage used to cover down payment and closing costs. These programs are structured in a variety of ways including forgivable grants and zero interest loans. BBT originated 1,452 loans totaling \$291.8 million through its partnership with the Illinois Development Housing Authority, and 403 loans totaling \$2.9 million through the Federal Home Loan Bank Down Payment Program.

*Money Smart Everyday Loans*

Money Smart Everyday Loan is offered as an alternative to payday loans. These loans provide unsecured financing from \$500 to \$2,500 as an alternative to payday lenders with lower interest rates and up to 24-month repayment terms. BBT originated 34 loans totaling \$73,766 in the AA through the Money Smart Everyday Loan Program, and 12 loans totaling \$27,400 outside of the AA.

*Money Smart CD Secured Loans*

Money Smart Certificate of Deposits Secured Loans are offered to assist individuals with low credit scores and to those with non-established or blemished credit histories. The loan is secured by a certificate of deposit that grows as the loan is repaid in monthly installments. After payoff, customers receive use of the money from the certificate of deposit and reporting of credit history. During the evaluation period, BBT originated 33 loans totaling \$27,500 in the AA through the Money Smart CD Secured Loan Program, and eight loans totaling \$4,500 outside of the AA.

*Small Business Administration (SBA) Loans*

BBT actively participates in SBA programs including the 504-loan program, 7a loan program, and the Express program. SBA loan programs offer lower down payment requirements or allow for higher loan-to-values to better provide for the needs of small businesses. BBT originated 23 SBA loans totaling \$7.3 million in the AA, and 27 loans totaling \$17.4 million outside of the AA.

*Easy Access LOC and Installment Programs*

Easy Access LOC and Easy Access Installment programs are small and micro loans offered to small businesses. These programs are targeted to help meet the needs of small businesses with revenues of less than \$1.0 million with short-term LOC funding to support inventory and accounts receivables as well as support with secured and unsecured term loans. During the evaluation period, BBT originated 260 loans totaling \$11.5 million in the AA through the Easy Access LOC Program, and 87 loans totaling \$6.8 million outside of the AA. The bank originated 22 loans totaling \$988,949 in the AA through the Easy Access Installment Program, and seven loans totaling \$428,085 outside of the AA.

**INVESTMENT TEST**

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

Based on a full-scope review, the bank's performance in the Chicago CSA is good.

The institution has a good level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

| Qualified Investments |               |           |                |           |       |              |           |               |                        |           |
|-----------------------|---------------|-----------|----------------|-----------|-------|--------------|-----------|---------------|------------------------|-----------|
| Assessment Area       | Prior Period* |           | Current Period |           | Total |              |           |               | Unfunded Commitments** |           |
|                       | #             | \$(000's) | #              | \$(000's) | #     | % of Total # | \$(000's) | % of Total \$ | #                      | \$(000's) |
| Chicago CSA           | 25            | 16,231    | 236            | 15,435    | 261   | 93.5         | 31,666    | 88.8          | 2                      | 1,459     |
| Regional              | 2             | 1,741     | 11             | 1,139     | 13    | 4.7          | 2,880     | 8.1           | 3                      | 1,359     |
| National              | 0             | 0         | 5              | 1,134     | 5     | 1.8          | 1,134     | 3.2           | 0                      | 0         |

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments within the Chicago CSA totaled \$31.7 million, with current period investments of \$15.4 million, including qualified grants of \$795,000, and prior period investments of \$16.2 million. Investments benefiting the AA during the evaluation represented 7.6 percent of allocated tier 1 capital. The bank also had \$1.5 million in unfunded commitments remaining at the end of the evaluation period in the Chicago CSA. The unfunded commitments consisted of loan pool funds that support affordable housing for an area nonprofit CDFI.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances totaled \$16.2 million and were primarily made of bond and mutual fund investments that support affordable housing, small business growth and job creation, healthcare, and infrastructure projects that foster sustainable economic development. Bank investments were responsive to identified community needs related to affordable housing and economic development.

Examples of CD investments made during the evaluation period that showed responsiveness to CSA needs included:

- \$8.5 million to a CDFI that provides below market financing and services to nonprofits. The CDFI partners with nonprofits that serve numerous sectors including affordable housing, healthcare, education, and economic development initiatives benefitting LMI families throughout the Chicago and greater statewide area.
- \$1.3 million in affordable housing bonds that helped create and preserve affordable housing which meets an integral need in the CSA.
- \$1.3 million to a nonprofit organization that provides affordable financing and technical assistance for community stabilization and development efforts and initiatives benefitting LMI neighborhoods, families, and individuals throughout the CSA.

Grants made were to organizations supporting community services, affordable housing, and economic development benefiting LMI individuals and families within the CSA. Grants were responsive to community service needs in the AA.

Examples of qualified grants made in the AA included:

- \$150,000 to a nonprofit organization that seeks to provide housing for people that are homeless, at risk of foreclosure, or living in inadequate housing.
- \$75,000 to a nonprofit organization that provides private school scholarships to low-income students.
- \$25,000 to an organization that provides comprehensive family counseling, youth outreach and prevention programs for children in need. Most of their clients are LMI, who pay reduced fees since fees are based on the ability to pay.
- \$12,500 to a nonprofit business accelerator program that supports small businesses by providing counseling services to overcome growth barriers, develop business plans, and enhance business acumen.

## SERVICE TEST

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

Based on a full-scope review, the bank’s performance in the Chicago CSA is excellent.

### Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

| Distribution of Branch Delivery System |                                |                    |                                |   |      |      |      |                                       |      |      |      |
|--|--------------------------------|--------------------|--------------------------------|---|------|------|------|---------------------------------------|------|------|------|
| 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  | Low                                   | Mod  | Mid  | Upp  |
| Chicago CSA                            | 100.0                          | 8                  | 100.0                          | 0.0   | 25.0 | 25.0 | 50.0 | 1.1                                   | 11.4 | 42.0 | 45.5 |

The bank had eight branches in the AA. There were no branches in low-income CTs, and two branches located in moderate-income CTs. The proportion of bank branches in low-income CTs was significantly below the percentage of the population in those geographies. The proportion of bank branches in moderate-income CTs exceeded the percentage of the population in those geographies. BBT has two branches in middle-income CTs near low-income and moderate-income CTs. These branches provide additional access to LMI customers in the AA. Branches in close proximity to low-income CTs had a positive impact on our retail servicing conclusion. The OCC reviewed documentation explaining how

these middle-income branches benefited LMI and performed an analysis on the volume of accounts were open by LMI customers during the evaluation period.

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 low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches throughout the evaluation period.

Services, including where appropriate, business hours do not vary in a way that inconveniences the needs of the various portions of its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

## **Community Development Services**

The institution is a leader in providing CD services.

CD services were responsive in helping the bank address the community needs in a variety of different organizations and hours of service that employees participated in to support the LMI individuals and families. BBT employees from various lines of business provided 3,313 service hours to 58 non-profits and community service organizations. Additionally, bank employees provided 517 hours of financial education targeted to LMI individuals and small businesses within the AA. Services reflected ongoing relationships with several organizations in the AA.

Examples of services include the following:

- Various employees served 517 hours for in-person or virtual financial literacy workshop seminars and 123 hours for small business participants through the FDIC Money Smart financial educational programs. FDIC Money Smart financial education programs are targeted towards LMI individuals and small businesses. The programs help individuals of all ages and small businesses enhance their financial skills and create positive banking relationships. The Money Smart program provides basic financial concepts to school aged children, as well as training and technical assistance to new or aspiring business owners.
- A senior executive served 61 hours as a board member and fundraising chairperson for a nonprofit organization providing community service. The non-profit organization offers programs such as adult literacy, job training, youth engagement services for all ages, and childcare programs benefitting LMI individuals and families.
- A bank employee performed 51 service hours to a non-profit organization that provides affordable housing services to LMI families in the AA. The organization offers home repair, renovation, and special services for customized needs of elderly and disabled people. The employee demonstrated leadership by being on the board of directors and providing technical expertise as it relates to banking and finance.

## Appendix A: Scope of Examination

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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”.

|   |   |                               |
|---|---|-------------------------------|
| <b>Time Period Reviewed:</b>                            | 1/1/2021 through 12/31/2023   |                               |
| <b>Bank Products Reviewed:</b>                          | Home mortgage loans, small business loans, consumer loans<br><br>Community development loans, qualified investments, and community development services |                               |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>   | <b>Products Reviewed</b>      |
| N/A   | N/A   | N/A                           |
| <b>List of Assessment Areas and Type of Examination</b> |   |                               |
| <b>Rating and Assessment Areas</b>                      | <b>Type of Exam</b>   | <b>Other Information</b>      |
| Illinois  |   | Counties                      |
| Chicago CSA   | Full-Scope  | Cook County* and Lake County* |

\*Partial county

## Appendix B: Summary of MMSA and State Ratings

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| RATINGS: Barrington Bank and Trust, National Association |                      |                        |                     |                                      |
|--|----------------------|------------------------|---------------------|--------------------------------------|
| Overall Bank:  | Lending Test Rating* | Investment Test Rating | Service Test Rating | Overall Bank/State/Multistate Rating |
| Barrington Bank and Trust, National Association          | Outstanding          | High Satisfactory      | Outstanding         | Outstanding                          |
| State:   |                      |                        |                     |                                      |
| Illinois   | Outstanding          | High Satisfactory      | 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 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 §1003.2 of this title, and that is not an excluded transaction under §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 investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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.

**MMSA (state):** 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.

**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 multi-state 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state 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.

**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

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### 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 O. 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 P. 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/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. 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 assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table R. 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 U. 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 V. 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/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography |                           |                    |              |                |                                   |              |            |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              | 2022-23    |  |  |
|--|---------------------------|--------------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|--|--|
| Assessment Area:   | Total Home Mortgage Loans |                    |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |            | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |  |  |
|  | #                         | \$                 | % of Total   | 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 CSA  | 378                       | 127,268,613        | 100.0        | 12,214         | 0.6                               | 0.5          | 0.5        | 6.2                               | 6.9          | 7.5        | 43.6                              | 37.6         | 41.9        | 49.6                              | 55.0         | 50.1        | 0.0                               | 0.0          | 0.0        |  |  |
| <b>Total</b>   | <b>378</b>                | <b>127,268,613</b> | <b>100.0</b> | <b>12,214</b>  | <b>0.6</b>                        | <b>0.5</b>   | <b>0.5</b> | <b>6.2</b>                        | <b>6.9</b>   | <b>7.5</b> | <b>43.6</b>                       | <b>37.6</b>  | <b>41.9</b> | <b>49.6</b>                       | <b>55.0</b>  | <b>50.1</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |  |  |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 BankData, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography |                           |                    |              |                |                                   |              |            |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              | 2021       |  |  |
|--|---------------------------|--------------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|--|--|
| Assessment Area:   | Total Home Mortgage Loans |                    |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |            | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |  |  |
|  | #                         | \$                 | % of Total   | 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 CSA  | 703                       | 209,766,319        | 100.0        | 28,806         | 0.0                               | 0.0          | 0.0        | 4.7                               | 4.1          | 4.0        | 32.0                              | 24.5         | 30.6        | 63.3                              | 71.4         | 65.4        | 0.0                               | 0.0          | 0.0        |  |  |
| <b>Total</b>   | <b>703</b>                | <b>209,766,319</b> | <b>100.0</b> | <b>28,806</b>  | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> | <b>4.7</b>                        | <b>4.1</b>   | <b>4.0</b> | <b>32.0</b>                       | <b>24.5</b>  | <b>30.6</b> | <b>63.3</b>                       | <b>71.4</b>  | <b>65.4</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |  |  |

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

| <b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b> |            |                    |                   |                       |                             |                     |                  |                                  |                     |                  |                                |                     |                  |                               |                     |                  |                                       |                     |                  | <b>2022-23</b> |
|--|------------|--------------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|----------------|
| <b>Total Home Mortgage Loans</b>   |            |                    |                   |                       | <b>Low-Income Borrowers</b> |                     |                  | <b>Moderate-Income Borrowers</b> |                     |                  | <b>Middle-Income Borrowers</b> |                     |                  | <b>Upper-Income Borrowers</b> |                     |                  | <b>Not Available-Income Borrowers</b> |                     |                  |                |
| <b>Assessment Area:</b>  | <b>#</b>   | <b>\$</b>          | <b>% of Total</b> | <b>Overall Market</b> | <b>% Families</b>           | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>                | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>              | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>             | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>                     | <b>% Bank Loans</b> | <b>Aggregate</b> |                |
| Chicago CSA  | 378        | 127,268,613        | 100.0             | 12,214                | 15.2                        | 7.4                 | 8.8              | 15.7                             | 21.7                | 21.1             | 21.3                           | 23.0                | 22.1             | 47.7                          | 42.9                | 34.9             | 0.0                                   | 5.0                 | 13.2             |                |
| <b>Total</b>   | <b>378</b> | <b>127,268,613</b> | <b>100.0</b>      | <b>12,214</b>         | <b>15.2</b>                 | <b>7.4</b>          | <b>8.8</b>       | <b>15.7</b>                      | <b>21.7</b>         | <b>21.1</b>      | <b>21.3</b>                    | <b>23.0</b>         | <b>22.1</b>      | <b>47.7</b>                   | <b>42.9</b>         | <b>34.9</b>      | <b>0.0</b>                            | <b>5.0</b>          | <b>13.2</b>      |                |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 BankData, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

| <b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b> |            |                    |                   |                       |                             |                     |                  |                                  |                     |                  |                                |                     |                  |                               |                     |                  |                                       |                     |                  | <b>2021</b> |
|--|------------|--------------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|-------------|
| <b>Total Home Mortgage Loans</b>   |            |                    |                   |                       | <b>Low-Income Borrowers</b> |                     |                  | <b>Moderate-Income Borrowers</b> |                     |                  | <b>Middle-Income Borrowers</b> |                     |                  | <b>Upper-Income Borrowers</b> |                     |                  | <b>Not Available-Income Borrowers</b> |                     |                  |             |
| <b>Assessment Area:</b>  | <b>#</b>   | <b>\$</b>          | <b>% of Total</b> | <b>Overall Market</b> | <b>% Families</b>           | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>                | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>              | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>             | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>                     | <b>% Bank Loans</b> | <b>Aggregate</b> |             |
| Chicago CSA  | 703        | 209,766,319        | 100.0             | 28,806                | 13.3                        | 4.8                 | 5.9              | 14.5                             | 17.9                | 17.0             | 20.0                           | 21.6                | 21.7             | 52.3                          | 50.5                | 42.4             | 0.0                                   | 5.1                 | 13.0             |             |
| <b>Total</b>   | <b>703</b> | <b>209,766,319</b> | <b>100.0</b>      | <b>28,806</b>         | <b>13.3</b>                 | <b>4.8</b>          | <b>5.9</b>       | <b>14.5</b>                      | <b>17.9</b>         | <b>17.0</b>      | <b>20.0</b>                    | <b>21.6</b>         | <b>21.7</b>      | <b>52.3</b>                   | <b>50.5</b>         | <b>42.4</b>      | <b>0.0</b>                            | <b>5.1</b>          | <b>13.0</b>      |             |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*



**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2022-23**

| 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   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate  | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate  |
| Chicago CSA      | 723                             | 66,404        | 100.0        | 15,645         | 0.6               | 2.2          | 0.7        | 6.0                    | 6.5          | 6.5        | 45.7                 | 39.3         | 46.1        | 47.7                | 52.0         | 46.7        | 0.0                         | 0.0          | 0.0        |
| <b>Total</b>     | <b>723</b>                      | <b>66,404</b> | <b>100.0</b> | <b>15,645</b>  | <b>0.6</b>        | <b>2.2</b>   | <b>0.7</b> | <b>6.0</b>             | <b>6.5</b>   | <b>6.5</b> | <b>45.7</b>          | <b>39.3</b>  | <b>46.1</b> | <b>47.7</b>         | <b>52.0</b>  | <b>46.7</b> | <b>0.0</b>                  | <b>0.0</b>   | <b>0.0</b> |

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

| 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   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate  |
| Chicago CSA      | 692                             | 54,459        | 100.0        | 16,660         | 0.0               | 0.0          | 0.0        | 13.5                   | 18.6         | 12.8        | 25.4                 | 23.3         | 26.8        | 61.2                | 58.1         | 60.4        | 0.0                         | 0.0          | 0.0        |
| <b>Total</b>     | <b>692</b>                      | <b>54,459</b> | <b>100.0</b> | <b>16,660</b>  | <b>0.0</b>        | <b>0.0</b>   | <b>0.0</b> | <b>13.5</b>            | <b>18.6</b>  | <b>12.8</b> | <b>25.4</b>          | <b>23.3</b>  | <b>26.8</b> | <b>61.2</b>         | <b>58.1</b>  | <b>60.4</b> | <b>0.0</b>                  | <b>0.0</b>   | <b>0.0</b> |

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b> |                                 |               |              |                |                                 |              |             |                                |              |  |              | <b>2022-23</b> |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|
| Assessment Area:   | Total Loans to Small Businesses |               |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |                |
|  | #                               | \$            | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |                |
| Chicago CSA  | 723                             | 66,404        | 100.0        | 15,645         | 89.8                            | 62.2         | 54.1        | 3.6                            | 26.4         | 6.5                                    | 11.3         |                |
| <b>Total</b>   | <b>723</b>                      | <b>66,404</b> | <b>100.0</b> | <b>15,645</b>  | <b>89.8</b>                     | <b>62.2</b>  | <b>54.1</b> | <b>3.6</b>                     | <b>26.4</b>  | <b>6.5</b>                             | <b>11.3</b>  |                |

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b> |                                 |               |              |                |                                 |              |             |                                |              |  |              | <b>2021</b> |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|-------------|
| Assessment Area:   | Total Loans to Small Businesses |               |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |             |
|  | #                               | \$            | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |             |
| Chicago CSA  | 692                             | 54,459        | 100.0        | 16,660         | 85.6                            | 71.2         | 48.6        | 5.3                            | 24.3         | 9.1                                    | 4.5          |             |
| <b>Total</b>   | <b>692</b>                      | <b>54,459</b> | <b>100.0</b> | <b>16,660</b>  | <b>85.6</b>                     | <b>71.2</b>  | <b>48.6</b> | <b>5.3</b>                     | <b>24.3</b>  | <b>9.1</b>                             | <b>4.5</b>   |             |

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

| <b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b> |                      |            |              |                   |              |                        |              |                      |              |                     |              |                             |              | <b>2022-23</b> |
|--|----------------------|------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|----------------|
| 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 CSA  | 49                   | 125        | 100.0        | 0.8               | 0.0          | 8.8                    | 14.3         | 46.4                 | 40.8         | 44.0                | 44.9         | 0.0                         | 0.0          |                |
| <b>TOTAL</b>   | <b>49</b>            | <b>125</b> | <b>100.0</b> | <b>0.8</b>        | <b>0.0</b>   | <b>8.8</b>             | <b>14.3</b>  | <b>46.4</b>          | <b>40.8</b>  | <b>44.0</b>         | <b>44.9</b>  | <b>0.0</b>                  | <b>0.0</b>   |                |

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 BankData. Due to rounding, totals may not equal 100.0%*

| <b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b> |                      |           |              |                   |              |                        |              |                      |              |                     |              |                             |              | <b>2021</b> |
|--|----------------------|-----------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|-------------|
| 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 CSA  | 28                   | 89        | 100.0        | 0.0               | 0.0          | 8.3                    | 3.6          | 34.6                 | 35.7         | 57.1                | 60.7         | 0.0                         | 0.0          |             |
| <b>TOTAL</b>   | <b>28</b>            | <b>89</b> | <b>100.0</b> | <b>0.0</b>        | <b>0.0</b>   | <b>8.3</b>             | <b>3.6</b>   | <b>34.6</b>          | <b>35.7</b>  | <b>57.1</b>         | <b>60.7</b>  | <b>0.0</b>                  | <b>0.0</b>   |             |

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%*

| Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower |                      |            |              |                      |              |                           |              |                         |              |                        |              |                                | 2022-23      |  |
|--|----------------------|------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|--|
| Assessment Area:   | Total Consumer Loans |            |              | Low-Income Borrowers |              | Moderate-Income Borrowers |              | Middle-Income Borrowers |              | Upper-Income Borrowers |              | Not Available-Income Borrowers |              |  |
|  | #                    | \$         | % of Total   | % of Households      | % Bank Loans | % of Households           | % Bank Loans | % of Households         | % Bank Loans | % of Households        | % Bank Loans | % of Households                | % Bank Loans |  |
| Chicago CSA  | 49                   | 125        | 100.0        | 16.3                 | 57.1         | 14.2                      | 18.4         | 18.3                    | 8.2          | 51.3                   | 14.3         | 0.0                            | 2.0          |  |
| <b>Total</b>   | <b>49</b>            | <b>125</b> | <b>100.0</b> | <b>16.3</b>          | <b>57.1</b>  | <b>14.2</b>               | <b>18.4</b>  | <b>18.3</b>             | <b>8.2</b>   | <b>51.3</b>            | <b>14.3</b>  | <b>0.0</b>                     | <b>2.0</b>   |  |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data. Due to rounding, totals may not equal 100.0%

| Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower |                      |           |              |                      |              |                           |              |                         |              |                        |              |                                | 2021         |  |
|--|----------------------|-----------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|--|
| Assessment Area:   | Total Consumer Loans |           |              | Low-Income Borrowers |              | Moderate-Income Borrowers |              | Middle-Income Borrowers |              | Upper-Income Borrowers |              | Not Available-Income Borrowers |              |  |
|  | #                    | \$        | % of Total   | % of Households      | % Bank Loans | % of Households           | % Bank Loans | % of Households         | % Bank Loans | % of Households        | % Bank Loans | % of Households                | % Bank Loans |  |
| Chicago CSA  | 28                   | 89        | 100.0        | 15.2                 | 67.9         | 13.1                      | 21.4         | 17.7                    | 3.6          | 54.0                   | 7.1          | 0.0                            | 0.0          |  |
| <b>Total</b>   | <b>28</b>            | <b>89</b> | <b>100.0</b> | <b>15.2</b>          | <b>67.9</b>  | <b>13.1</b>               | <b>21.4</b>  | <b>17.7</b>             | <b>3.6</b>   | <b>54.0</b>            | <b>7.1</b>   | <b>0.0</b>                     | <b>0.0</b>   |  |

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%