



PUBLIC DISCLOSURE

June 3, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Beverly Bank and Trust, National Association
Charter Number: 24466

10258 South Western Avenue
Chicago, IL 60643

Office of the Comptroller of the Currency

Midsized 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.

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Overall CRA Rating

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

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

Performance Levels	Beverly Bank and Trust 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 borrower and geographical distribution of loans. The bank is a leader in providing community development (CD) loans. The bank makes extensive use of innovative and flexible loans to serve its assessment area (AA).
- The Investment Test rating is based on the performance in the state of Illinois rating area. The bank has a good level of qualified CD investment and grants, occasionally in a leadership position. The institution exhibits good responsiveness to community economic development needs.
- The Service Test rating is based on service delivery systems that were readily accessible to geographies and individuals of different income levels. Branch openings provided expanded access to low- and moderate-income (LMI) populations. The bank is a leader in providing CD services.

Lending in Assessment Area

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

The bank originated and purchased 13.5 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.

Lending Inside and Outside of the Assessment Area – January 1, 2021, through December 31, 2023										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	154	64.4	85	35.6	239	61,538	43.9	78,613	56.1	140,151
Small Business	4,998	12.8	34,183	87.2	39,181	371,268	15.1	2,088,232	84.9	2,459,500
Small Farm	0	0.0	320	100.0	320	0	0.0	28,596	100.0	28,596
Consumer	393	97.3	11	2.7	404	3,252	95.3	159	4.7	3,411
Total	5,545	13.8	34,599	86.2	40,144	436,058	16.6	2,195,600	83.4	2,631,658

Nationwide lending programs used by the bank impact the ratio of loans located inside the bank's AA. Barrington Bank's (BBT) affiliate, Wintrust Mortgage, 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 Wintrust Mortgage 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

BEV is a \$2.3 billion intrastate bank headquartered in Chicago, Illinois. BEV is a wholly owned subsidiary of Wintrust Financial Corporation (WFC). As of December 31, 2023, WFC is a \$56.3 billion financial services holding company located in Rosemont, Illinois. WFC'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.

WFC locations provide a wide range of lending and deposit products and services to their customers. WFC residential mortgage applications are referred to Wintrust Mortgage (WM), a division of BBT. WM is a national residential mortgage operation with offices throughout the United States, offering a wide variety of retail mortgages and originating nearly all WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 15 WFC banks for their portfolio.

WFC provides niche lending products across the nation within their community banks. These specialty products include wealth management advisory services, commercial insurance premium financing through First 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, BEV provides lease and loan financing for commercial assets to direct and indirect customers through their wholly owned subsidiary, Wintrust Asset Finance.

As of December 31, 2023, BEV reported total loans of \$1.8 billion, representing 81.7 percent of total assets. BEV's primary loan product is commercial loans, totaling \$847.0 million, and representing 46.1 percent of total loans. Real estate loans represent the next largest category, at \$751.6 million or 46.2 percent of total loans. This is followed by individual loans representing 11.0 percent of total loans and other loans and leases at 2.6 percent of total loans. BEV had tier 1 capital of \$216.5 million.

The bank has one rating area, Illinois, and one AA, which consists of all of Cook County, Illinois. The AA is located in the Chicago-Naperville-Elgin Metropolitan Statistical Area (MSA). BEV operates nine full-service branches offering a variety of loan and deposit products, including a branch that was opened in 2023 in the Woodlawn neighborhood of Chicago. Branch locations offer Automated Teller Machines (ATMs) with a drive-up facility at the headquarters location and a walk-up window at the branch location. The primary loan products offered are business loans and home mortgage loans through the affiliate mortgage company.

According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share report, BEV had 0.28 percent market share making it the 38th 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 of its AAs. There were no acquisitions or mergers during the evaluation period that would have affected the bank's CRA performance or the OCC's analysis. The bank received an Outstanding rating in its previous CRA evaluation dated August 2, 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 small business loans that management reported under CRA, and home mortgage loans reported under Home Mortgage Disclosure Act (HMDA). 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.

In evaluating the bank's Lending Test performance, the OCC analyzed two periods when evaluating 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. Generally, equal weight is given to the geographic distribution of loans and lending by the borrower income level. Conclusions for geographical and borrower distribution of loans had greater weight placed on the loans originated between January 1, 2022, through December 31, 2023, as this period accounted for 65 percent of all HMDA and small business loan originations and 64.5 percent of the loan volume.

Tables and analysis for geographic and borrower distribution of loans 2022 through 2023 use 2022 peer aggregate data, due to the lack of availability of 2023 data at the time of this evaluation. 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 MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) were evaluated as a single AA. The combined AA was evaluated as full scope. The AA was comprised of contiguous Metropolitan Divisions (MDs)/MSAs that are part of a CSA; therefore, the bank's performance is presented at the CSA level. Refer to the Scope section under each State Rating section for details regarding how the full-scope AA was selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating was 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 more weight on the bank's distribution of small business loans compared to home mortgage loans based on the loan origination volume.

Generally, equal emphasis is given to the geographic distribution and borrower distribution of loans by income level. Greater weight was generally given to loans originated between January 1, 2022, through December 31, 2023, as more HMDA and small loans to businesses were made in time period compared to 2021.

In performing the analysis of investments, we considered the high level of competition in the AA when formulating our conclusion. Competition is high, with large interstate, regional, and community banks competing 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 banks 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 has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Illinois

CRA rating for the State of Illinois:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Lending levels exhibit excellent responsiveness to community credit needs.
- The institution exhibits an excellent geographic and borrower distribution of loans in its AA.
- The bank is a leader in originating 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.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA. Branch openings improved access to LMI populations.
- The institution is a leader in providing CD services.

Description of Institution’s Operations in Illinois

The bank’s only AA in Illinois is Cook County in its entirety, which is in the Chicago-Naperville-Elgin, IL MSA (Chicago AA). Refer to appendix A for more information about the AA.

BEV’s AA contains 1,332 contiguous census tracts (CTs), with 225 low- and 351 moderate-income tracts. The AA increased by 13 CTs in 2022 based on the 2020 U.S. Census. The city of Chicago represents half of Cook County and has the largest population. The bank’s nine branches are in the Chicago neighborhoods of Beverly, Brighton Park, Hyde Park, Pullman, Woodlawn, and the villages of Oak Lawn and Evergreen Park.

Competition presents significant challenges for financial institutions in maintaining market share and profitability. As of June 30, 2023, there were 422 banks operating approximately 3,717 banking offices in Illinois. With its branch locations and \$1.9 billion in deposits, BEV ranked 38th in the state with a 0.28 percent market share based on deposits. 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 40.8 percent of the deposit market.

Based on information from the February 2024 Moody’s Analytics report, the Chicago-Naperville-Elgin’ economy is underperforming as payroll employment has been flat for months. The area’s economy is driven by healthcare, manufacturing, and government, and these industries have kept the job market

afloat amid job losses in professional/business services and logistics. As a strength, the area is the primary center for business, distribution, transportation, and finance. Other strengths of the area include large talent pool, strong roster of well-regarded educational institutions, and budding high-tech center in River North neighborhood. Weaknesses of the area include state and local budget pressures and weak population trends. Top five employers in the area are federal, state, and local government, Amazon.com Inc., Advocate Health Care System, Northwestern Memorial Healthcare, and University of Chicago. The Moody's Analytics report projects that while finance and professional/business services will find their footing, the economy will rely on other industries to keep it moving forward.

According to the "Bureau of Labor Statistics" (BLS), the unemployment rate peaked at 7.9 percent in January 2021, reflecting the adverse economic impact of the Covid-19 pandemic. The unemployment rate at the end of the evaluation period in December 2023 dropped to 4.0 percent, which is lower than the statewide annual unemployment rate of 4.5 percent.

The poverty level of the county was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. According to the 2020 U.S. Census, 10.1 percent of families in Cook County had income(s) below the federal poverty line. The percentage of people living below the poverty line dropped from 13.2 percent as of the 2015 ACS.

According to Table A, the median housing value of owner-occupied housing units for the Chicago MSA was \$245,250 for 2021 (2015 ACS) and \$287,457 for 2022 through 2023 (2020 U.S. Census). Based on this data, housing values increased 66.8 percent over the assessment period.

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 DTI 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 MSA median housing value would have been \$1,543. 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 MSA from 2022 through 2023. Some moderate-income families may struggle to qualify as well.

Based on data from the 2015 ACS covering 2021, low-income families earned less than \$3,126 and moderate-income families earned less than \$5,002 monthly. Using 30.0 percent as a reasonable DTI 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 MSA median housing value would have been \$1,316. Based on this data, we concluded that home mortgage loans were not affordable to low-income borrowers in the AA, with some moderate-income borrowers likely to struggle as well.

As part of the CRA Evaluation, the OCC reviewed information from 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 LMI 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.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,332	16.9	26.4	27.7	27.9	1.2
Population by Geography	5,275,541	13.4	26.8	30.4	28.8	0.5
Housing Units by Geography	2,198,489	13.3	25.4	29.7	30.9	0.6
Owner-Occupied Units by Geography	1,139,938	7.3	22.8	34.7	34.9	0.3
Occupied Rental Units by Geography	851,536	18.8	28.5	25.1	26.6	1.0
Vacant Units by Geography	207,015	24.0	26.9	21.4	26.8	0.9
Businesses by Geography	698,343	8.4	20.4	28.2	42.3	0.7
Farms by Geography	6,439	8.8	22.3	31.0	37.5	0.4
Family Distribution by Income Level	1,183,425	27.3	16.9	18.1	37.7	0.0
Household Distribution by Income Level	1,991,474	28.8	15.7	16.4	39.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Elgin, IL		\$92,622	Median Housing Value			\$287,457
			Median Gross Rent			\$1,230
			Families Below Poverty Level			10.1%
<i>Source: 2020 U.S. Census and 2023 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,319	19.2	28.9	24.0	26.9	1.0
Population by Geography	5,236,393	14.5	29.9	27.0	28.3	0.4
Housing Units by Geography	2,176,549	14.4	27.9	26.3	30.8	0.5
Owner-Occupied Units by Geography	1,107,485	6.9	24.2	32.0	36.7	0.2

Occupied Rental Units by Geography	835,474	20.8	32.1	20.9	25.3	0.9
Vacant Units by Geography	233,590	27.5	30.5	19.1	22.3	0.6
Businesses by Geography	474,429	8.6	21.7	24.6	44.3	0.7
Farms by Geography	4,567	7.2	23.4	29.2	40.0	0.2
Family Distribution by Income Level	1,184,857	28.0	17.0	17.7	37.2	0.0
Household Distribution by Income Level	1,942,959	29.2	15.8	16.7	38.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Elgin, IL		\$75,024	Median Housing Value			\$245,250
			Median Gross Rent			\$1,038
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

The Chicago MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope area. Refer to appendix A for more information about the AA.

More weight was given in the Lending Test to small business lending. We gave more weight to small business lending since small business loans accounted for 97.0 percent of the total number of originations and 85.8 percent of the total loan volume of HMDA and CRA small business loans, throughout the evaluation period. We gave the least amount of weight to conclusions related to consumer loans.

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

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

A near to branch is classified as a branch in a middle- or upper-income (MUI) area that is proximate to an LMI area and serves that area. These branches are in a reasonable distance from the LMI CTs they are serving. The bank provided adequate support demonstrating that these branches are servicing customers in LMI areas. The bank had two branches in MUI CTs that were considered near to branches.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The bank's market share ranking for originating small business loans in the AA is higher than the bank's ranking in deposits in the AA while the bank's market share ranking for originations home mortgage loans in the AA is lower than the bank's ranking for deposits in the AA. We considered the substantial volume of loans originated through a subsidiary for insurance premium financing in the analysis.

Number of Loans 2021 through 2023							
Assessment Area	Home Mortgage	Small Business	Consumer	Community Development	Total	% State Loans	% State Deposits
Chicago MSA	154	4,998	393	117	5,662	100.0	100.0

Dollar Volume of Loans (000's) 2021 through 2023							
Assessment Area	Home Mortgage	Small Business	Consumer	Community Development	Total	% State Loans	% State Deposits
Chicago MSA	\$61,538	\$371,268	\$3,252	\$80,954	\$517,012	100.0	100.0

According to June 30, 2023, FDIC Summary of Deposits Report, the bank had \$1.9 billion in deposits in the Chicago MSA. The bank's deposits totaled a 0.33 percent market share of deposits, which ranked 33rd out of 158 deposit taking institutions. The bank's deposit market share ranking was in the top 21.8 percent of institutions taking deposits in the Chicago MSA.

According to 2022 Peer Mortgage Data, the bank had a 0.03 percent market share of home mortgage loan originations. The bank's market share of home mortgage loans was significantly below the bank's market share of deposits. The bank's market share of mortgage loans ranked 239th out of 834 home mortgage lenders in the AA. The bank's market share ranking of home mortgage loans was in the top 27.4 percent of all mortgage lenders. The bank's market share ranking of home mortgage loans was below its deposit market share ranking.

According to 2022 Peer Small Business Data, the bank had a 2.0 percent market of small business loan originations in the AA. The bank's market share of small business loan originations was stronger than its deposit market share. The bank's market share of small business loans ranked 14th out of 226 small business loan lenders in the AA. The bank's market share ranking was in the top 6.2 percent of all small business lenders in the Chicago MSA. The bank's market share ranking was stronger than its deposit market share ranking.

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. The proportion of bank home mortgage loans, 2022 through 2023, in LMI CTs exceeded the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans to those geographies. Performance in 2021 was consistent with performance 2022 through 2023.

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. The proportion of bank loans, 2022 through 2023, in LMI geographies exceeded the percentage of businesses and the aggregate industry distribution of small business loans to those geographies. Performance in 2021 was similar with the proportion of bank loans exceeding the percentage of businesses and the aggregate industry distribution of small business loans in low-income geographies and exceeded the percentage of businesses but was near to the aggregate performance in moderate-income geographies.

Consumer Loans

Refer to Table U in the state rating 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 geographical distribution of consumer loans is excellent. The proportion of bank consumer loans, 2022 through 2023, in LMI geographies exceeded the percentage of households in those geographies. The bank performance for geographical distribution of consumer loans in 2021 was consistent with performance in 2022 through 2023.

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 home mortgage and small business 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 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 borrower distribution of home mortgage loans is good. The high cost of housing limits opportunities for LMI borrowers and the negative impact on economic conditions may have limited the bank's lending opportunities.

The proportion of bank home mortgage loans, 2022 through 2023, to low-income borrowers was below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of bank home mortgage loans, 2022 through 2023, to moderate-income borrowers exceeded the percentage of moderate-income families and but was below the aggregate industry distribution of home mortgage loans to those borrowers. Performance in 2021 to low-income borrowers was well below the percentage of low-income families in the AA but exceeded the aggregate industry distribution of home loans to those borrowers. Performance in 2021 to moderate-income borrowers was below both the percentage of families and aggregate industry distribution to moderate-income borrowers.

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 business was excellent.

The bank originates a substantial volume of loans through a subsidiary for insurance premium financing, which is a nationwide product underwritten without the collection of revenue data.

When determining our conclusions, we considered the percentage of bank small business loans that did not include revenue information, throughout the evaluation period. Therefore, we gave more weight in the conclusion to performance as compared to the aggregate industry distribution of loans.

The proportion of bank small loans to businesses was significantly below the percentage of businesses with revenue less than \$1.0 million. The proportion of bank loans substantially meets the aggregate industry distribution of loans to those businesses. Bank performance in 2021 was stronger than performance in 2022 through 2023. Stronger performance was due to a higher percentage of bank loans as compared to the percentage of businesses with revenues less than \$1.0 million. The bank's performance in 2021 exceeded the aggregate industry distribution of loans to small businesses. Performance in 2021 had a positive impact on the conclusion of borrower distribution of small loans to businesses.

Consumer Loans

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

The borrower distribution of consumer loans is excellent. The proportion of bank loans to LMI borrowers, 2022 through 2023, exceeded the percentage of LMI households. Performance in 2021 was consistent with performance in 2022 through 2023.

Community Development Lending

The institution is a leader in making CD loans, and CD lending had a positive impact on the overall lending test.

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.

The bank had an excellent level of CD loans. During the evaluation period, the bank originated 117 CD loans totaling \$80.95 million, representing 36.54 percent of the bank's tier 1 capital. CD loans primarily supported affordable housing and community services to LMI individuals. By dollar volume, 56.1 percent of these loans funded affordable housing, 34.1 percent funded community services targeted to LMI individuals, 5.8 percent funded economic development, and 4.0 percent funded revitalization and stabilization efforts. CD loans were responsive to affordable housing needs in the AA.

The following are examples of bank CD loans:

- The bank originated a \$10.0 million commercial mortgage to finance a 345-unit apartment complex in a moderate-income CT in a south suburb of Chicago. All units are below the Fair Market Rents for the area, providing affordable housing to LMI individuals of this moderate-income community.
- The bank originated a \$3.5 million commercial mortgage to assist the rehabilitation of a 68-unit multifamily apartment building in a low-income CT, categorized as a persistent poverty census tract, within the AA. Approximately 60.0 to 70.0 percent of the rents are subsidized through programs with the Chicago Housing Authority or Housing Authority of Cook County. All units are below median rent standards providing affordable housing to LMI individuals in the area.
- The bank issued a \$3.5 million renewable line of credit to a nonprofit organization that provides supportive services and opportunities for LMI individuals with disabilities. The services include residential, life skills, employment, recreational and family support. All adults served by the organization's residential program are below the federal poverty threshold.
- The bank made 52 Paycheck Protection Program (PPP) loans that qualified as CD loans totaling \$3.9 million in its AA. The PPP loans supported small businesses and nonprofit organizations impacted by the Covid-19 pandemic.

National and Broader Regional Area CD Loans

The bank originated four additional CD loans totaling \$11.2 million that supported the national or broader regional area. All CD loans outside of the bank's AA were part of the PPP loan program and had a CD purpose to revitalize and stabilize.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs.

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

Money Smart Everyday Loans

The bank originated 185 loans in the AA through the Money Smart Everyday Loan Program, totaling \$402,783, and seven loans outside of the AA, totaling \$17,000. This product provides a flexible alternative to payday loans, to meet the small dollar needs of LMI individuals.

Money Smart CD Secured Loans

The bank originated 117 loans in the AA through the Money Smart CD Secured Loan Program, totaling \$109,772, and one loan outside of the AA, totaling \$1,000. This product assists LMI individuals in establishing credit or improving credit history. The bank applies relaxed underwriting guidelines and secures the loans with a bank-funded Certificate of Deposit. The bank reports the monthly payments to the credit bureaus to assist in credit building/repair. 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 deposits and reporting of credit history. The bank's underwriting criteria is liberal, and loans are secured with a bank funded Certificate of Deposit. The bank assists in customer credit building/repair by reporting all monthly payments to the credit bureaus.

Small Business Administration (SBA) Loans

The bank originated a total of 20 SBA loans in the AA totaling \$9.3 million, and eight loans outside of the AA totaling \$3.7 million. The bank actively participates in various SBA programs, including the 504-loan program, 7A program, and Express program. The programs provide small businesses with access to funds that would not be readily attainable through traditional conventional lending products. SBA loan programs may have benefits such as lower down payment requirements or allow for higher LTVs to better align with the needs of small businesses.

Easy Access Line of Credit and Installment Programs

The bank originated 218 loans in the AA through the Easy Access Line of Credit Program, totaling \$15.3 million, and 24 loans outside of the AA, totaling \$2.1 million. The bank originated 28 loans in the AA through the Easy Access Installment Program, totaling \$1.3 million, and five loans outside of the AA, totaling \$422,817. The small and micro loans are flexible and assist small businesses with short-term LOC funding to support inventory and accounts receivables as well as support with term loans.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA is good. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

The bank 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 bank exhibits excellent responsiveness to credit and community economic development needs. The institution makes occasionally uses of 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 MSA	12	6,174	344	12,597	356	95.9	18,771	84.8	4	2,297
Broader Regional	2	1,200	6	584	8	2.2	1,758	7.9	0	0
National	0	0	7	1,600	7	1.9	1,600	7.2	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.

During the evaluation period, qualified investments totaled \$18.7 million. The dollar volume of current- and prior- period investments was equivalent to 8.2 percent of allocated tier 1 capital. Total qualified investments included 322 qualifying grants and donations totaling \$2.9 million to 138 organizations. Additionally, the bank had four unfunded commitments totaling \$2.3 million. Current period investments were responsive to affordable housing and economic development needs. By dollar volume, 34.4 percent of current period CD investments supported affordable housing and 40.3 percent supported economic development, 21.2 percent supported community services targeted to LMI individuals and 4.1 percent supported revitalization and stabilization efforts.

The following are examples of bank CD investments:

- \$1.0 million in a Low-Income Housing Tax Credit that supported affordable housing in the AA. The bank's funds were a participation in the investment and assisted in supporting the creation of 350 affordable housing units. The units will be for senior citizens whose income is below 60.0 percent of area median income.
- Four CD investments totaling \$949,000 promoted economic development. The bank purchased three Certificates of Deposit at a Women-owned financial institution and one Certificate of Deposit at a minority-owned institution.
- \$500,000 investment with a nonprofit CDFI. The CDFI is known for revitalizing predominantly LMI communities on Chicago's southwest side. Funds will be used to support the CDFI's flexible and affordable lending products and efforts to purchase, rehab, and sell vacant homes.

National and Regional Investments

We also considered qualified investments that served a broader regional area, including neighboring states. The bank made two CD investments and four donations totaling \$584,000 that supported the broader regional areas of Illinois. Additionally, the broader regional area benefitted from the ongoing impact two prior period investments totaling \$1.2 million. Furthermore, the bank made seven CD investments totaling \$1.6 million to national investment funds. All the national and broader regional investments were used for the purpose of economic development.

SERVICE TEST

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

Conclusions For Area Receiving a Full Scope Review

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

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA. Opening a branch in a low-income geography had a positive impact on the Service Test conclusion.

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 MSA	100.0	9	100.0	11.1	22.2	55.6	11.1	13.4	26.8	30.4	28.8

*May not total 100.0 percent due to NA CTs

The bank’s branch distribution is excellent. The bank has nine branches in the AA, with one branch in a low-income geography and two branches in moderate-income geographies. The proportion of bank branches in low-income CTs was near to the percentage of the population in low-income geographies. The proportion of bank branches in moderate-income geographies was near to the percentage of the population in moderate-income geographies.

In addition to branches in LMI CTs, we also considered bank branches that were within two miles of an LMI CTs that supported LMI people. The bank had two branches in middle-income CTs that were within two miles of LMI CTs, that provided additional access to LMI people in the AA. The near to branches had a positive impact on branch distribution conclusions. 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 of the volume of accounts opened by LMI customers during the evaluation period. The bank had an additional nine deposit taking ATMs, with two in moderate-income CTs and one in a low-income CT.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago MSA	1	0	+1	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low-income geographies and/or to LMI individuals.

There was one branch opened in a low-income CT. This branch solidified the bank's presence in low-income CTs, as another branch in a low-income CT was redesignated as a moderate-income CT due to the 2020 U.S. Census changes. The branch in the low-income geography is part of a larger revitalization of area and will ultimately be located within a community center. The opening of this branch demonstrates bank leadership and commitment to the community it serves.

Services, including business hours where appropriate, do not vary in a way that inconveniences, its AA, particularly LMI geographies and/or individuals.

Community Development Services

The institution is a leader in providing CD services.

CD services were responsive in helping the bank address the community needs. Employees participated with a variety of different organizations to support LMI individuals and families. Employees served on committees and boards for organizations that promote affordable housing, community services, and financial literacy in the bank's AA. BEV conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. Bank employees from various lines of business provided 6,371 hours of community development services during the evaluation period. Approximately 82 employees provided CD services to 117 organizations within the AA.

Services reflected ongoing relationships with several organizations in the AA. During the evaluation period, 66.1 percent of the bank CD service hours supported community service organizations and 29.1 percent of CD service hours supported economic development organizations.

The following are some examples of bank CD service hours:

- Bank executives, senior personnel, and directors performed 1,259 hours of CD service with 22 LMI organizations in the AA. Service included various board membership, finance, budget, and fundraising committee roles, as well as mentorship, and program coordinator roles. Organizations supported had varying focuses including economic development and stability programs, employment and career development services, youth and educational services, and critical/health management and assistance services.

- A bank executive provided 53 hours in support of community services. The bank executive served on the board for a nonprofit organization which provides comprehensive support to low-income families in Chicago through skill building, access to critical resources, advocacy, and collaborative action. The organization also provides limited essential services, including affordable legal and citizenship support, high-quality early childhood education, adult education programs, and mental health services.
- A bank employee served on the board of a nonprofit organization that provides economic stimulus to under-resourced communities in Chicago. The organization provides shared working space, micro loans, and technical assistance to LMI entrepreneurs. The organization also offers a 12-week financial literacy course, and one-on-one coaching and mentoring to assist LMI entrepreneurs.
- Bank employees provided 787 hours of financial literacy education. The financial literacy was provided to primarily LMI individuals or small business owners.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

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

Appendix B: Summary of MMSA and State Ratings

RATINGS: Beverly Bank and Trust, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Beverly 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.

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.

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.

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

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 30th of each year. Tables without data are not included in this PE.

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

- Table 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.
- 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.

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 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 **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 MSA	49	26,171,915	100.0	241,306	6.9	18.4	5.4	24.2	32.7	19.3	32.0	16.3	29.7	36.7	32.7	45.4	0.2	0.0	0.2
Total	49	26,171,915	100.0	241,306	6.9	18.4	5.4	24.2	32.7	19.3	32.0	16.3	29.7	36.7	32.7	45.4	0.2	0.0	0.2

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

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 MSA	105	35,366,211	100.0	120,681	7.3	18.1	7.2	22.8	30.5	21.1	34.7	32.4	32.8	34.9	18.1	38.6	0.3	1.0	0.4
Total	105	35,366,211	100.0	120,681	7.3	18.1	7.2	22.8	30.5	21.1	34.7	32.4	32.8	34.9	18.1	38.6	0.3	1.0	0.4

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MSA	49	26,171,915	100.0	241,306	28.0	8.2	5.9	17.0	10.2	15.6	17.7	8.2	20.6	37.2	26.5	41.4	0.0	46.9	16.4
Total	49	26,171,915	100.0	241,306	28.0	8.2	5.9	17.0	10.2	15.6	17.7	8.2	20.6	37.2	26.5	41.4	0.0	46.9	16.4

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MSA	105	35,366,211	100.0	120,681	27.3	15.2	10.1	16.9	18.1	21.1	18.1	7.6	19.5	37.7	24.8	31.2	0.0	34.3	18.2
Total	105	35,366,211	100.0	120,681	27.3	15.2	10.1	16.9	18.1	21.1	18.1	7.6	19.5	37.7	24.8	31.2	0.0	34.3	18.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data
 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 MSA	1,754	127,508	100.0	188,404	8.6	12.7	10.0	21.7	24.9	25.1	24.6	23.0	26.6	44.3	38.6	37.8	0.7	0.9	0.5
Total	1,754	127,508	100.0	188,404	8.6	12.7	10.0	21.7	24.9	25.1	24.6	23.0	26.6	44.3	38.6	37.8	0.7	0.9	0.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data
 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 MSA	3,244	243,760	100.0	154,657	8.4	12.9	7.0	20.4	21.1	20.5	28.2	28.4	31.8	42.3	36.8	40.1	0.7	0.9	0.6
Total	3,244	243,760	100.0	154,657	8.4	12.9	7.0	20.4	21.1	20.5	28.2	28.4	31.8	42.3	36.8	40.1	0.7	0.9	0.6

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

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 MSA	1,754	127,508	100.0	188,404	87.5	55.0	41.9	4.7	23.3	7.8	21.7
Total	1,754	127,508	100.0	188,404	87.5	55.0	41.9	4.7	23.3	7.8	21.7

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

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 MSA	3,244	243,760	100.0	154,657	91.2	51.0	54.0	3.3	22.2	5.6	26.9
Total	3,244	243,760	100.0	154,657	91.2	51.0	54.0	3.3	22.2	5.6	26.9

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2021**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MSA	127	417	100.0	12.9	37.8	27.6	33.9	27.2	17.3	31.8	11.0	0.5	0.0
Total	127	417	100.0	12.9	37.8	27.6	33.9	27.2	17.3	31.8	11.0	0.5	0.0

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MSA	266	2,835	100.0	12.2	24.1	25.2	37.6	30.6	28.9	31.4	9.4	0.6	0.0
Total	266	2,835	100.0	12.2	24.1	25.2	37.6	30.6	28.9	31.4	9.4	0.6	0.0

*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 MSA	127	417	100.0	29.2	55.1	15.8	22.0	16.7	15.0	38.2	2.4	0.0	5.5
Total	127	417	100.0	29.2	55.1	15.8	22.0	16.7	15.0	38.2	2.4	0.0	5.5

*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 MSA	266	2,835	100.0	28.8	60.5	15.7	18.4	16.4	10.5	39.2	4.9	0.0	5.6
Total	266	2,835	100.0	28.8	60.5	15.7	18.4	16.4	10.5	39.2	4.9	0.0	5.6

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