



PUBLIC DISCLOSURE

July 29, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old Plank Trail Community Bank, N.A.
Charter Number: 24646

20012 Wolf Road
Mokena, IL 60448

Office of the Comptroller of the Currency

Midsized & 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.....	5
Discriminatory or Other Illegal Credit Practices Review	7
Multistate Metropolitan Statistical Area Rating.....	8
Chicago MMSA	8
Appendix A: Scope of Examination	A-1
Appendix B: Summary of Multistate MSA/CSA 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 Old Plank Trail Community Bank, N.A. (OPT or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Old Plank Trail Community Bank, N.A. 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 made extensive use of innovative and/or flexible loans to serve its assessment area (AA).
- The Investment Test rating is based on a significant level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibited good responsiveness to credit and community economic development needs.
- The Service Test rating is based on service delivery systems that were readily accessible geographies and individuals of different income levels. The bank is a leader in providing CD services.

Lending in Assessment Area

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

The bank originated and purchased 6.7 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										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	141	48.8	148	51.2	289	41,558	22.7	141,495	77.3	183,053
Small Business	3,598	6.1	55,306	93.9	58,904	264,017	11.5	2,037,872	88.5	2,301,889
Small Farm	1	25.0	3	75.0	4	2	2.0	97	98.0	99
Consumer	256	92.4	21	7.6	277	4,788	88.4	625	11.6	5,413
Total	3,996	6.7	55,478	93.3	59,474	310,365	12.5	2,180,089	87.5	2,490,454

Nationwide lending programs used by the bank impact the ratio of loans located inside the bank's AA. Wintrust Mortgage (WM), a division of OPT affiliate Barrington Bank & Trust Company, N.A., has a nationwide presence, which results in a small number of loans being originated in 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

OPT, a \$2.6 billion interstate bank headquartered in Mokena, Illinois, 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 WM, which 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, commercial insurance premium financing through First Insurance Funding, lease financing, short-term account receivable financing, administrative services, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2023, OPT reported tier one capital of \$227.7 million and total loans of \$1.8 billion, representing 70.1 percent of total assets. OPT has four primary loan types that make up 90.3 percent of the total loan portfolio. The primary loan products include approximately \$840.2 million of commercial loans or 45.5 percent of total loans, \$417.1 million of consumer loans or 22.6 percent of total loans, \$281.0 million secured by nonfarm nonresidential properties or 15.2 percent of total loans, and \$129.1 million secured by 1-4 family residential properties or 7.0 percent of the total loan portfolio.

The bank operated 15 branches within the AA during the majority of the review period. There were 14 full-service branches, each with deposit taking ATMs and two limited-service ATMs, located throughout Will and Cook Counties in Illinois. OPT had one branch in Lake County, Indiana, which

included a deposit taking ATM. Since the last CRA Public Evaluation, OPT closed one branch in July 2023 and opened one deposit-taking stand-alone ATM within the AA.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. OPT'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 assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

Refer to the "Scope" section under the MMSA 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 was based on the MMSA rating.

In evaluating performance under the Lending Test, we placed more weight on the bank's distribution of 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. 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.

Refer to the "Scope" section under the MMSA 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 (collectively, bank) 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 Bureau of Consumer Financial Protection, 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.

Multistate Metropolitan Statistical Area Rating

Chicago MMSA

CRA rating for the for the Chicago MMSA¹:	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 activity reflected good responsiveness to credit needs in its AA.
- The bank exhibited an excellent geographic distribution of loans in the AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and business of different sizes.
- The bank was a leader in making CD loans.
- The bank had a significant level of qualified investments.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. Additionally, the bank was a leader in providing CD services.

Description of Institution's Operations in Chicago MMSA

OPT has one designated AA, which is comprised of portions of the Chicago-Naperville, IL-IN-WI MMSA (Chicago MMSA) that includes two metropolitan division (MDs). These MDs are the Chicago-Naperville-Evanston MD (Illinois MD) and Gary (Indiana MD). The Chicago-Naperville-Evanston MD consists of Cook and Will counties in Illinois and the Gary MD consists of Lake County in Indiana. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, OPT had 14 branches and 22 ATMs, of which 20 were deposit taking, within the AA. Competition was extensive. There were 116 total FDIC-insured financial institutions operating 1,459 branches in the AA. The top five competitors captured 65.3 percent of the market share and included JPMorgan Chase Bank, N.A. with 205 branches and 22.8 percent market share, BMO Harris Bank, N.A. with 115 branches and 18.8 percent of market share, Bank of America, N.A. with 93 branches and 10 percent market share, CIBC Bank USA with 14 branches and 8.1 percent market share, and The Northern Trust Company with two branches and 5.6 percent market share. Additionally, according to 2022 aggregate home mortgage and aggregate small business lending data, there were 632 home mortgage and 234 small business lenders that originated or purchased loans within the AA. The top five home mortgage lenders by number of loans and market share included Guaranteed Rate, Inc, Rocket Mortgage, US Bank, N.A., JPMorgan Chase Bank, N.A., and LoanDepot.com, LLC. These five

¹This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

home mortgage lenders had a combined loan market share of 21.8 percent. The top five small business lenders by number of loans and market share included JPMorgan Chase, N.A., American Express National Bank, Bank of America, N.A., Citibank, N.A., and US Bank, N.A., with a combined total market share of 68 percent. Additionally, these top five small business lenders are also institutions that have significant small business credit card portfolios with small business loan sizes averaging between \$6,000 up to \$20,000. OPT’s average small business loan size as of 2022 totaled \$88,000.

The following tables provide a summary of the demographics, including housing and business information for the Chicago MMSA.

Table A – Demographic Information of the Assessment Area 2021						
Assessment Area: Chicago MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	444	11.3	28.4	34.5	25.5	0.5
Population by Geography	1,941,052	7.7	26.6	34.2	31.5	0.0
Housing Units by Geography	747,137	8.8	27.3	35.0	28.9	0.0
Owner-Occupied Units by Geography	503,219	4.0	21.9	37.3	36.9	0.0
Occupied Rental Units by Geography	174,416	18.2	39.0	30.8	12.1	0.0
Vacant Units by Geography	69,502	19.9	37.9	29.1	13.1	0.0
Businesses by Geography	151,113	6.4	23.7	34.4	35.4	0.0
Farms by Geography	2,446	4.5	20.9	35.3	39.3	0.0
Family Distribution by Income Level	474,969	23.0	16.9	20.0	40.1	0.0
Household Distribution by Income Level	677,635	25.3	15.4	17.9	41.4	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$173,400
Median Family Income MSA - 23844 Gary, IN		\$64,075	Median Gross Rent			\$962
			Families Below Poverty Level			10.8%

Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%. () The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area 2022 - 2023						
Assessment Area: Chicago MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	471	10.2	29.3	34.6	24.8	1.1
Population by Geography	1,912,462	7.4	27.7	34.7	29.7	0.4
Housing Units by Geography	750,157	8.6	29.7	34.6	26.7	0.4
Owner-Occupied Units by Geography	511,356	4.5	23.9	37.8	33.3	0.4
Occupied Rental Units by Geography	176,596	16.6	42.7	28.4	11.9	0.4
Vacant Units by Geography	62,205	19.1	40.9	25.6	14.1	0.3
Businesses by Geography	215,343	6.9	26.6	34.3	32.0	0.2
Farms by Geography	3,246	6.5	24.1	35.2	33.9	0.4
Family Distribution by Income Level	473,597	23.5	17.8	20.4	38.3	0.0
Household Distribution by Income Level	687,952	25.7	16.1	17.6	40.6	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$192,660
Median Family Income MSA - 23844 Gary, IN		\$75,625	Median Gross Rent			\$1,071
			Families Below Poverty Level			8.9%
<i>Source: 2020 U.S. Census and 2023 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the 2015 ACS Data covering 2021, the AA consisted of 444 contiguous census tracts (CTs), consisting of 50 (11.3 percent) low-income, 126 (28.4 percent) moderate-income, 153 (34.5 percent) middle-income, and 113 (25.5 percent) upper-income CTs. Two CTs did not have income level designations. The area population was slightly over 1.9 million with approximately 1.3 million residents or 65.7 percent living in middle- and upper-income CTs. The population living in low- and moderate-income CTs equated to 665,746 or 34.3 percent. The majority of owner-occupied housing units as well as businesses by geography were located in moderate, middle, and upper-income CTs.

According to 2020 US Census Data, covering 2022 and 2023, the AA consisted of 471 contiguous CTs, consisting of 48 (10.2 percent) low-income, 138 (29.3 percent) moderate-income, 163 (34.6 percent) middle-income, and 117 (24.8 percent) upper-income CTs. Five CTs did not have income level designations. The area population remained at slightly over 1.9 million with approximately 1.2 million residents or 64.4 percent living in middle- and upper-income CTs. The population living in low- and moderate-income CTs equated to 672,636 or 35.2 percent. Similar to 2021 demographic data, the majority of owner-occupied housing units as well as businesses by geography were located in moderate, middle, and upper-income CTs.

The November 2023 Moody's Analytics Report notes that the Chicago MMSA economy has showed signs of slowing down and payroll levels flattened in the past several months. Area weaknesses include state and local budget pressure, which can lead to reduced public services, such as education and infrastructure, and possible increases in taxes or fees. In addition, the area is experiencing a weak population trend. Slow population growth or decline can lead to reduced economic activity and labor shortages, and a shrinking tax base which can strain local governments and public services. These trends also contribute to declining housing markets and challenges in attracting businesses and investment,

further hindering long-term regional growth. The area's strengths include a budding high-tech center, high level of talent and highly rated educational institutions, and major center for business, distribution, transportation, and finance. Major economic drivers include the financial center, logistics, and tourism. Additionally, healthcare remains a strong source of job growth. However, support from other industries such as business services, transportation and warehousing, and leisure and hospitality are trending downwards. Despite downward pressure, the AA's post pandemic job market is healthy, having rebounded with the unemployment rate decreasing from 2021 through 2023. Rent and housing affordability has declined. The AA's primary employment industries include professional and business services, education and health services, and government. The top five employers include Amazon.com Inc., Advocate Health Care System, Northwestern Memorial Healthcare, University of Chicago, and Walgreens Boots Alliance Inc.

According to the U.S. Bureau of Labor Statistics report, the unemployment rate in the Chicago MMSA was 7.9 percent as of January 2021, compared to 4.1 percent in December 2023. The Chicago MMSA unemployment rate was slightly lower than the 4.2 percent unemployment rate for the state of Illinois and higher than the 2.9 percent unemployment rate for the state of Indiana in December 2023.

Based on the 2015 ACS Data information in the 2021 table, low-income families earned less than \$37,512 in the Illinois MD and less than \$32,038 in the Gary MD. Whereas, moderate-income families earned less than \$60,019 in the Illinois MD and \$51,260 in the Gary MD. Additionally, according to the 2020 U.S Census Data in the 2022-2023 table, low-income families earned less than \$46,311 in the Illinois MD and less than \$37,813 in the Gary MD. Moderate-income families earned less than \$74,098 in the Illinois MD and \$60,500 in the Gary MD. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of an applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment of \$961 and \$1,125 as well as \$1,134 and \$1,389 for low-income borrowers for the periods covering 2021 and 2022-2023, respectively. Additionally, this equated to \$1,538 and \$1,801 as well as \$1,815 and \$2,193 for moderate-income borrowers for the same periods, respectively. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$931 in 2021 and \$1,034 in the 2022-2023 period. Based on this information, most low-income and moderate-income borrowers would be able to afford a mortgage loan in this AA during the review period.

As part of the CRA evaluation, the OCC reviewed information from three contacts completed during the evaluation period. The primary mission of two of the contacts is to support retention and expansion of local businesses and mentoring of underserved entrepreneurs. The primary mission of the third contact is to provide affordable housing programs, and assistance and services to secure and retain quality housing for low- to moderate-income individuals or families. Community needs identified by the organizations include loans for start-up capitalization for small businesses, small dollar loans for small businesses, financial education for small business operators, affordable housing for low- to moderate-income individuals or families, financial literacy counseling for first-time homebuyers that include down payment assistance, and banking services for individuals with individual taxpayer identification numbers as opposed to social security numbers. The third contact also identified that increased interest rates and decreased housing supply would require tailored loan products to acquire and rehab homes for low- and moderate-income individuals or families.

Scope of Evaluation in Chicago MMSA

The Chicago MMSA is the bank's only designated AA. Therefore, ratings are based on the results of the bank's performance in this full-scope area.

We placed the highest weight on the bank's small business lending. Additionally, for the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank's performance in moderate-income geographies due to the higher percentages of owner-occupied housing units and businesses in these areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHICAGO MMSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Chicago MMSA	141	3,598	1	76	3,816
Regional	-	-	-	28	28
TOTAL	141	3,598	1	104	3,844

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Chicago MMSA	41,558	264,017	2	60,219	365,796
Regional	-	-	-	39,697	39,697
TOTAL	41,558	264,017	2	99,916	405,493

According to FDIC Deposit Market Share data as of June 30, 2023, OPT had \$2.3 billion in deposits with a deposit market share of 0.5 percent. The bank ranked 18th (top 15.5 percent) in total deposits out of 116 banks in the AA.

According to 2022 peer small business data, OPT ranked 20th out of 234 lenders (top 8.5 percent) with a market share of 0.6 percent of lenders originating or purchasing small business loans in the AA. Competitiveness for small business loans within the AA is high. The five largest small business lenders were all large national banks with business credit card portfolios and captured 68 percent of the market.

According to 2022 peer mortgage data, OPT ranked 123rd out of 632 lenders (top 19.5 percent) with a market share of 0.1 percent of lenders originating home mortgage loans in the AA. Competition within the AA for home mortgage loans is high. The five largest mortgage lenders, which included national banks and large mortgage lenders, captured 21.8 percent of the market.

Distribution of Loans by Income Level of the Geography

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

In determining our overall conclusions, we considered the high level of competition for small business and home mortgage loans, bank performance context, housing and business demographic data, and the impact of the pandemic. Other considerations related to a specific product are noted within those representative sections below.

Home Mortgage Loans

Refer to Table O in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent. When determining our conclusions, we considered OPT referring a significant portion of home mortgage requests to WM for origination, competition, and any impact resulting from the pandemic.

For 2021 as well as 2022 through 2023, the percentage of the bank’s mortgage lending exceeded the percentage of owner-occupied housing and aggregate lending of all reporting lenders in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent. Included in the 2021 analysis were 402 paycheck protection program (PPP) loans totaling \$39 million to small business that provided support during the COVID-19 pandemic. Consideration of OPT’s volume of PPP lending had a positive impact on the conclusion as it supported financial stability of small businesses and communities in the AA.

For 2021, the percentage of small business loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of businesses located in those geographies. The percentage of small business loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

For 2022 through 2023, the percentage of small business loans originated or purchased in low-income geographies was below, and in moderate-income geographies equaled, the percentage of businesses located in those geographies. The percentage of small business loans originated or purchased in low- and moderate- income geographies exceeded the aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table U in the “MMSA” 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 was excellent.

For 2021, the percentage of consumer loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of households in those geographies.

For 2022 through 2023, the bank's performance was stronger than 2021 performance, as the percentage of consumers lending exceeded the percentage of households in both low- and moderate-income geographies.

Lending Gap Analysis

The OCC evaluated the bank's geographic lending patterns of home mortgage loans, small loans to businesses, and consumer loans by mapping loan originations and purchases throughout the AA. We did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and business of different sizes.

In determining our overall conclusions, we considered the high level of competition for small loans to small businesses and home mortgage loans, bank performance context, housing and business demographic data, and the impact of the pandemic. Other considerations related to a specific product are noted within those representative sections below.

Home Mortgage Loans

Refer to Table P in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The bank's distribution of home mortgage loans to low- and moderate-income borrowers was adequate. When determining our conclusions, we considered OPT referring a significant portion of home mortgage requests to WM for origination. Additionally, we also considered the bank originating a high percentage of home mortgage loans with no income reported.

For 2021, the percentage of home mortgage loans originated or purchased to low- and moderate-income borrowers was significantly below the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low- and moderate-income borrowers was significantly below the aggregate percentage of all reporting lenders.

For 2022 through 2023, the bank's performance was stronger than with 2021 performance. The percentage of mortgage loans originated or purchased to low-income borrowers was well below, and moderate-income borrowers exceeded, compared to the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low- and moderate-income borrowers was near-to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to businesses.

The bank’s distribution of small loans to businesses was excellent. When determining our conclusions, we considered the high percentage of bank small business loans that did not include revenue information throughout the evaluation period. Thus, we gave more weight on the bank’s performance in comparison to aggregate lending performance.

For 2021, the percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2022 through 2023, the percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table V in the “MMSA” 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 bank’s distribution of consumer loans to low- and moderate-income borrowers was excellent.

In 2021 and 2022 through 2023, the proportion of consumer loans originated or purchased to low- and moderate-income borrowers exceeded the percentage of households located in those geographies.

Community Development Lending

The bank is a leader in making CD loans. The level of CD lending has a positive impact on the lending test conclusion for the Chicago MMSA.

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 level of CD lending was excellent. The bank originated 76 CD loans totaling \$60.2 million, representing 26.4 percent of allocated tier 1 capital. The CD lending activity included 29 loans totaling \$11.7 million supporting affordable housing, 20 loans totaling \$24.2 million supporting revitalization and stabilization, 25 loans totaling \$21.3 million supporting community services, and two loans totaling \$3.0 million supporting economic development.

Examples of CD loans in the AA include:

- Sixteen PPP loans that qualified as CD loans totaling \$12.7 million, which supported small businesses and nonprofit organizations impacted by the pandemic.

- Two revolving lines of credit totaling \$8.0 million for working capital to support community services for low- and moderate-income with developmental disabilities or other limiting conditions through housing, employment services, early childhood learning and foster care, and mental health crisis support.
- A \$416,500 loan to purchase a 9-unit multifamily property in a low-income area providing affordable housing to low- and moderate-income families and individuals.

Broader Regional and National CD Loans

CD lending in the broader regional area included 22 loans totaling \$30.6 million benefiting affordable housing, three PPP originations totaling \$5.1 million, and three SBA loans totaling \$4.0 million.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. We considered the loan programs which provided opportunities with direct benefit to low- and moderate-income borrowers and small businesses within the AA.

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 at much lower interest rates compared to payday lenders and up to 24-month repayment terms. The bank originated 161 loans totaling \$362,249 in the AA.

Money Smart CD Secured Loans

Money Smart Certificate of Deposit Secured Loan is offered to assist persons with very 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, the bank originated 19 loans totaling \$21,500 in the AA.

Easy Access LOC and Installment Programs

Easy Access Line of Credit and Easy Access Installment programs are small and micro loans offered to small businesses, which are a noted need in the community. 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, the bank originated 520 Easy Access LOC totaling \$32.1 million and 11 Easy Access Installment loans totaling \$497,817 in the AA.

Small Business Administration (SBA) Loans

Small Business Administration (SBA) loans provide access to funds by small businesses that would not otherwise be obtainable through traditional conventional lending products. In some cases, loans provide lower down payment requirements or can exceed loan to value standards to provide for the needs of the small business. During the exam period, 22 SBA loans were generated for a total of \$8.5 million in the AA.

INVESTMENT TEST

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

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

The institution had a significant level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

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

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago MMSA	14	4,851	260	14,292	274	96.1	19,143	87.9	1	523
Regional	3	1,685	5	242	8	2.8	1,927	8.9	3	315
National	0	0	3	694	3	1.1	694	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 MMSA totaled \$19.1 million, with current period investments of \$14.3 million. The dollar volume of current- and prior-period investments and grants, along with unfunded commitments, in the Chicago MMSA represented 8.6 percent of tier 1 capital. The bank's current and prior period investments and grants were responsive to the community development needs of affordable housing, economic development, and revitalization and stabilization. By dollar volume, approximately \$10.5 million or 55 percent supported community services, approximately \$4.7 million or 24.8 percent supported economic development, approximately \$2.4 million or 12.4 percent supported affordable housing, and approximately \$1.5 million or 7.8 percent supported revitalization and stabilization efforts.

Examples of qualified investments and donations in the Chicago MMSA include:

- Invested \$500,000 in a Housing Revenue Bond used for purchasing loans from lenders to provide permanent financing for the rehabilitation, acquisition, or construction of single-family homes made to low- and moderate-income individuals.
- Made three donations totaling \$150,000 to a nonprofit organization that coordinates resources, economic development, and neighborhood revitalization efforts in the low- and moderate-income neighborhoods.

- Made three donations totaling \$20,000 to a nonprofit organization that provides after-school and summer program opportunities to Chicago high school teens each year, primarily living in high poverty communities.

Broader Regional and National Investments

OPT made 11 CD investments and grants totaling \$2.9 million to organizations that benefitted broader regional and national areas. By dollar volume, 99.4 percent supported economic development and less than one percent supported community services. These investments supported the overall Investment Test conclusion for the Chicago MMSA AA.

SERVICE TEST

The institution’s performance under the Service Test in the Chicago MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Chicago MMSA 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	Upper	Low	Mod	Mid	Upper
Chicago MMSA	100.0	14	100.0	14.3	21.4	28.6	35.7	7.44	27.73	34.71	29.67

The bank has five branches within low- and moderate-income CTs. The percentage of branches in low-income geographies exceeded, and in moderate-income geographies was below the percentage of the population residing in those geographies. Additionally, the bank also has one near-to branch serving nearby low- and moderate-income CTs and installed a deposit-taking ATM in a moderate-income CT, resulting in positive consideration for the service test.

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

The institution's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

The bank closed their South Holland branch due to its proximity to other OPT branches. This branch was located in a middle-income tract and did not affect the accessibility to low- and moderate-income individuals. The bank then opened a stand-alone deposit-taking ATM in a moderate-income CT. The bank did not open any new branches during our review period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. OPT maintains standard business hours and offered traditional banking products and services at all branch locations in the AA. Branch lobby hours are 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The institution is a leader in providing CD services.

CD Services were effective and responsive in helping the bank address the community needs. OPT employees from various lines of business provided 7,890 hours of service across 74 different organizations. They included serving on committees, serving as board members, providing financial expertise to organizations that promote affordable housing, community service, and financial literacy in the bank's AA.

Examples of some of these services:

- All the executive team volunteer with a CRA qualified organization. One bank officer serves on the board and volunteers at many organizations and provided approximately 3,931 service hours during the review period. Many of the organizations provided various community services or support for educational programs, medical support, and bolstering healthy business climates for underserved communities in the AA.
- One bank employee provided 417 hours of service as a Board member and another employee provided four hours of financial education to clients of a non-profit organization focused on providing affordable housing.
- A bank employee provided 236 hours of training focused on financial literacy at an organization that provides supportive learning and community service resources such as housing to students that live below or at poverty. In addition to education and the residential component, the organization provides extensive extracurricular opportunities and proactive counseling services.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2021 through 12/31/2023	
Bank Products Reviewed:	Small business, home mortgage, consumer loans, community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Chicago MMSA	Full scope	Partial counties of Cook and Will in Illinois and Lake in Indiana

Appendix B: Summary of MMSA and State Ratings

RATINGS OLD PLANK TRAIL COMMUNITY BANK, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Old Plank Trail Community Bank, N.A.	Outstanding	High Satisfactory	Outstanding	Outstanding
MMSA or State:				
Chicago MMSA	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 low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): 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

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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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.

2021

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 MMSA	28	7,371	100.0	101,662	4.0	7.1	2.2	21.9	39.3	15.0	37.3	28.6	36.3	36.9	25.0	46.5	0.0	0.0	0.0
Total	28	7,371	100.0	101,662	4.0	7.1	2.2	21.9	39.3	15.0	37.3	28.6	36.3	36.9	25.0	46.5	0.0	0.0	0.0

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 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 MMSA	28	7,371	100.0	101,662	23.0	3.6	7.5	16.9	3.6	18.8	20.0	10.7	22.5	40.1	17.9	31.2	0.0	64.3	20.1
Total	28	7,371	100.0	101,662	23.0	3.6	7.5	16.9	3.6	18.8	20.0	10.7	22.5	40.1	17.9	31.2	0.0	64.3	20.1

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																			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 MMSA	1,371	101,750	100.0	60,813	6.4	6.9	6.4	23.7	21.0	25.7	34.5	36.4	33.3	35.4	35.7	34.6	0.0	0.0	0.0
Total	1,371	101,750	100.0	60,813	6.4	6.9	6.4	23.7	21.0	25.7	34.5	36.4	33.3	35.4	35.7	34.6	0.0	0.0	0.0

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%.

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 MMSA	1,371	101,750	100.0	60,813	88.7	65.8	40.6	3.6	23.7	7.7	10.5	
Total	1,371	101,750	100.0	60,813	88.7	65.8	40.6	3.6	23.7	7.7	10.5	

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%.

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 MMSA	65	330	100.0	7.6	12.3	26.3	23.1	35.6	43.1	30.5	21.5	0.0	0.0	
Total	65	330	100.0	7.6	12.3	26.3	23.1	35.6	43.1	30.5	21.5	0.0	0.0	

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														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 MMSA	65	330	100.0	25.3	47.7	15.4	23.1	17.9	9.2	41.4	10.8	0.0	9.2	
Total	65	330	100.0	25.3	47.7	15.4	23.1	17.9	9.2	41.4	10.8	0.0	9.2	

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

2022-2023

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 MMSA	113	34,187	100.0	55,328	4.5	6.2	4.5	23.9	25.7	23.3	37.8	31.0	37.8	33.3	37.2	34.2	0.4	0.0	0.2	
Total	113	34,187	100.0	55,328	4.5	6.2	4.5	23.9	25.7	23.3	37.8	31.0	37.8	33.3	37.2	34.2	0.4	0.0	0.2	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. 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 MMSA	113	34,187	100.0	55,328	23.5	12.4	12.8	17.8	22.1	24.6	20.4	15.0	21.2	38.3	30.1	21.8	0.0	20.4	19.7	
Total	113	34,187	100.0	55,328	23.5	12.4	12.8	17.8	22.1	24.6	20.4	15.0	21.2	38.3	30.1	21.8	0.0	20.4	19.7	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 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 MMSA	2,227	162,267	100.0	49,764	6.9	5.9	4.6	26.6	26.6	23.3	34.3	33.2	34.6	32.0	34.0	37.4	0.2	0.3	0.2
Total	2,227	162,267	100.0	49,764	6.9	5.9	4.6	26.6	26.6	23.3	34.3	33.2	34.6	32.0	34.0	37.4	0.2	0.3	0.2

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 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 MMSA	2,227	162,267	100.0	49,764	91.9	62.0	52.9	2.5	20.4	5.6	17.6
Total	2,227	162,267	100.0	49,764	91.9	62.0	52.9	2.5	20.4	5.6	17.6

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 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 MMSA	191	4,458	100.0	7.6	11.0	28.7	36.6	35.4	30.9	27.8	21.5	0.4	0.0
Total	191	4,458	100.0	7.6	11.0	28.7	36.6	35.4	30.9	27.8	21.5	0.4	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 **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 MMSA	191	4,458	100.0	25.7	58.6	16.1	25.1	17.6	5.8	40.6	6.3	0.0	4.2
Total	191	4,458	100.0	25.7	58.6	16.1	25.1	17.6	5.8	40.6	6.3	0.0	4.2

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