Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

May 30, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

St. Charles Bank & Trust Company
Charter Number: 25211

411 West Main Street
St. Charles, Illinois 60174

Office of the Comptroller of the Currency

Midsize 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 St. Charles Bank & Trust Company, N.A. with respect to the Lending, Investment, and Service Tests:

	St. Charles Bank & Trust Company Performance Tests		
Performance Levels	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 the performance in the state of Illinois rating area. The excellent geographic distribution of loans in its Assessment Area (AA), the excellent level of community development (CD) lending, and the extensive use of flexible lending programs was considered in arriving at the overall Lending Test rating.

- The Investment Test rating is based on performance in the state of Illinois rating area. The bank has an excellent level of qualified CD investments and grants across the rating area and at the regional level.

- The Service Test rating is based on performance in the state of Illinois rating area. The bank is a leader in providing CD services.

Lending in Assessment Area

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

The bank originated and purchased 6.6 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	42	36.2	74	63.8	116	16,206	22.4	56,297	77.6	72,502
Small Business	1,847	6.2	27,772	93.8	29,619	261,197	22.0	926,443	78.0	1,187,640
Small Farm	9	75.0	3	25.0	12	580	44.0	738	56.0	1,318
Consumer	78	71.6	31	28.4	109	1,123	31.9	2,402	68.1	3,525
Total	**1,976**	**6.6**	**27,880**	**93.4**	**29,856**	**279,106**	**22.1**	**985,880**	**77.9**	**1,264,986**

Source: 01/01/2020 - 12/31/2021 Bank Data
Due to rounding, totals may not equal 100.0%

Nationwide lending programs utilized by the bank impact the ratio of loans located inside the bank's AA. The bank purchases loans from First Insurance Funding (FIFCO), an affiliate of the bank, which impacts the ratio of loans located inside the bank's AA. During the evaluation period, the bank purchased 27,961 loans from FIFCO. A significant majority of the FIFCO purchased loans are located outside of the bank's AA and revenue data was not provided.

Small business loans are the bank's primary product 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

St. Charles Bank and Trust, N.A. (SCBT or the bank) is a $1.9 billion intrastate bank headquartered in St. Charles, Illinois. SCBT is a wholly-owned subsidiary of Wintrust Financial Corporation (WFC). As of December 31, 2021, WFC is a $50 billion financial services holding company located in Rosemont, Illinois. WFC's business strategy includes working with customers in the Chicago metropolitan area, southern Wisconsin, and northwest Indiana by way of their 15 wholly-owned banking subsidiaries and more than 150 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). WM is a national residential mortgage operation with offices throughout the United States. WM offers a wide variety of retail mortgages and originates 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, through its FIFCO affiliate, is one of the largest commercial insurance premium finance companies in the United States. FIFCO makes loans to businesses of difference sizes to finance the insurance premiums they pay on their commercial insurance policies. FIFCO is a leader in premium finance and life insurance premium finance transactions.

WFC banks offer specialty products including wealth management, lease financing, insurance premium financing, short-term account receivable financing, administrative services outsourcing, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2021, SCBT reported total loans of $1.4 billion, representing 73 percent of total assets. SCBT has three primary loan types that make up 97 percent of the total loan portfolio. The primary loan products include approximately $945 million of commercial loans or 66 percent of total loans, $368 million of consumer loans or 26 percent of total loans, and $84 million in residential lending or 6 percent of the total loan portfolio. SCBT had tier 1 capital of $174.5 million.

The bank operates seven full-service locations and seven deposit-taking Automated Teller Machines (ATMs). In November 2016, the bank acquired First Community Bank and its two banking offices in Elgin, IL. In November 2019, the bank acquired STC Capital Bank and its five banking offices in Geneva, South Elgin, and St. Charles, IL. Three branches in St. Charles, IL were closed in 2020 due to the proximity to existing SCBT branch locations. An additional branch was closed in 2021 for the same reason.

According to the June 30, 2021 Federal Deposit Insurance Corporation (FDIC) deposit market share report, SCBT had a 0.2 percent market share making it the 41st largest deposit holder out of 452 financial institutions in the state of Illinois.

COVID-19 Pandemic

In March 2020, the World Health Organization declared COVID-19 a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. The pandemic limited the ability of bank personnel to provide in-person services. The evaluation of the bank's performance takes into consideration the impact of the pandemic.

During the evaluation period, the bank strategically targeted certain CD investments and services to assist in addressing economic hardships associated with the pandemic mitigation practices, advancing the bank's commitment towards alleviating economic disparities among low- and moderate-income (LMI) communities. To meet Small Business Administration (SBA) initial guidance on the Payment Protection Program (PPP), the bank modified its technology systems to accommodate small businesses and nonprofit organizations. A PPP loan is SBA-backed and helped businesses keep their workforce employed during the pandemic.

Additionally, opportunities for virtual service deliveries were limited by the capacity of community organizations, and the ability of LMI families and small businesses to access virtual technology.

This disproportionally affected blue-collar jobs, in which LMI individuals are primarily employed. To assist their borrowers experiencing financial difficulty due to the pandemic, the bank offered various services and relief options. The following were relief and services offered by the bank:

- Loan deferrals and modifications,
- Waived all late fees on consumer loans and lines of credit,
- Waived early redemption fees on CDs and waived overdraft and insufficient funds fees,
- Rolled out DocuSign to safely execute the documentation required for deposit, loan, and deferral plans,
- Utilized video conference technology to conduct Money Smart and other financial education sessions,
- Offered hardship assistance, forbearance plan options, and waived late fees for mortgages.

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. The bank's acquisition during the evaluation period did not have an effect on the bank's CRA performance or the OCC's analysis. SCBT's CRA performance was rated "Satisfactory" in the last Performance Evaluation, performed by the Federal Reserve Bank (FRB), dated June 6, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's performance under the large bank Lending, Investment, and Service Tests. The evaluation period is June 7, 2016 through December 31, 2021.

The OCC permits depository institutions that demonstrate the ability to operate safely and soundly and in compliance with applicable laws, regulations, and policies, to convert to national bank charters. In 2019, the bank elected to apply for a national bank charter with regulatory supervision transferring from the FRB to the OCC upon approval. The national charter was issued on January 1, 2020, which is considered the "conversion date." The bank received consideration of CD activities conducted since the previous CRA evaluation.

In evaluating the bank's lending performance, the OCC analyzed home mortgage loans provided by the bank as they are not a Home Mortgage Disclosure Act (HMDA) reporter. For small loans made to businesses and small loans to farms the OCC analyzed the bank reported loans under the CRA. At the bank's request, the OCC considered consumer loan products, which consisted of secured and unsecured loans. 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. Multifamily loans and small loans to farms are not primary loan products; therefore, we did not evaluate these products separately. However, we did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending.

The OCC compared bank loan data for all applicable years in the state rating area to: demographic data using the U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2020 Dun and Bradstreet (D&B) small business demographic data; 2020 peer mortgage loan data reported under HMDA; and 2020 peer small business data reported under CRA. Banks are not required to report data on consumer loans; therefore, no peer aggregate data was available against which to compare bank consumer lending.

In evaluating the geographic distribution and borrower income criteria under the Lending Test, the 2020 through 2021 data was analyzed and aggregated. Performance tables O, P, Q, R, U, and V in Appendix D include data covered by the analysis period 2020 through 2021.

Bank and branch deposit data is as of June 30, 2021, based on information from the FDIC. The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

We also evaluated retail services, qualified investments, and CD services from June 7, 2016 through December 31, 2021. Qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are addressed in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) 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 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-scope AAs. There are no limited-scope AAs.

Ratings

The bank's overall rating was based on the state rating.

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 the bank's performance under the Lending Test, we placed greater weight on the bank's distribution of small business loans based on the volume. Equal weight was given to the bank's distribution of home mortgage loans and consumer loans. Small loans to farms were not evaluated based on the volume.

Generally, equal emphasis is given to the geographic distribution of loans and lending by borrower 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 or individuals served.

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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Illinois

CRA rating for the State of Illinois: Outstanding

The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending activity reflects good responsiveness to the credit needs in its AA.
- The bank exhibits an excellent geographic distribution of loans in its AA.
- The bank exhibits an adequate distribution of loans among businesses of different sizes.
- The bank is a leader in making CD loans and makes extensive use of flexible and/or innovative lending practices.
- The bank has an excellent level of qualified investments.
- Its service delivery systems are reasonably accessible to geographies and individuals or different income levels in its AA.
- The bank is a leader in providing community development services.

Description of Institution's Operations in the State of Illinois

SCBT designated one AA in Illinois, which consists of two counties within the Chicago-Naperville-Elgin MSA (Chicago MSA). The Chicago MSA consists of two Metropolitan Divisions (MD) which were combined for analysis purposes. These MDs are the Chicago-Naperville-Evanston MD and Elgin MD. The Chicago-Naperville-Evanston MD consists of DuPage County, and the Elgin MD consists of Kane County.

SCBT's AA consists of 298 contiguous census tracts (CTs) located in the northeastern portion of Illinois. The bank has delineated the AA with the full counties of DuPage (216 CTs) and Kane (82 CTs). The branches are located in the cities of Aurora, Elgin, Geneva, and St. Charles.

The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies. According to 2015 U.S. Census data, the AA consists of 298 CTs, of which four are low-income and 39 are moderate-income.

Chicago-Naperville-Elgin MSA

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

Table A – Demographic Information of the Assessment Area

Assessment Area: Chicago MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	298	1.3	13.1	35.9	49.7	0.0
Population by Geography	1,455,298	1.0	14.9	35.9	48.2	0.0
Housing Units by Geography	540,400	0.9	13.2	37.6	48.4	0.0
Owner-Occupied Units by Geography	375,411	0.5	10.1	34.7	54.6	0.0
Occupied Rental Units by Geography	135,151	1.7	20.2	44.5	33.5	0.0
Vacant Units by Geography	29,838	1.5	19.9	41.6	37.0	0.0
Businesses by Geography	120,439	0.7	7.4	34.1	57.8	0.0
Farms by Geography	2,255	0.6	11.3	40.1	48.0	0.0
Family Distribution by Income Level	368,472	16.3	14.9	19.1	49.7	0.0
Household Distribution by Income Level	510,562	18.1	14.3	17.1	50.4	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		$75,024	Median Housing Value			$268,426
Median Family Income MD - 20994 Elgin, IL		$80,899	Median Gross Rent			$1,113
			Families Below Poverty Level			6.3%

Source: 2015 ACS and 2020 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.

Community Contacts

The OCC made three community contacts in the AA during the evaluation period, which included one global nonprofit housing agency and two Chicagoland nonprofit organizations focused on neighborhood revitalization and economic development in LMI areas. Community contacts indicated that the following are needs within the bank's AA:

- Home mortgages in LMI areas,
- Home improvement loans regardless of appraisal gaps,
- Willingness to accept a wide range of mortgage down payment and closing cost assistance,
- Financing to owners of multifamily buildings for acquisition and rehabilitation,
- Small loans to small businesses,
- Board and Committee volunteerism,
- Financial education, student loan counseling, debt management counseling, and

- Homebuyer counseling programs.

Housing Characteristics

The housing market in the AA is challenged as demand exceeds housing supply, and prices continue to trend upwards. Rental affordability is a challenge for LMI families. The lack of affordable housing has made it difficult for LMI families to purchase homes in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. The 2021 FFIEC adjusted median family income (AMFI) in the AA is $87,100. According to Realtor.com data, the median housing value in the Chicago MSA is $299,900 and $312,500 in 2020 and 2021, respectively, reflecting a 4.2 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making $43,550 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a $202,814 mortgage with a payment of $1,089 per month. A moderate-income borrower making $69,680 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a $324,503 mortgage with a payment of $1,742 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Scope of Evaluation in the State of Illinois

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

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 based on the greater number of CTs.

For the borrower distribution analysis, consideration was given to the impact that income and housing costs have on limiting homeownership opportunities of LMI individuals and families. As such, more emphasis was placed on the bank's lending results to LMI borrowers relative to the aggregate performance rather than the demographic data.

In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses. A significant portion of the bank's small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these loans were originated by FIFCO without revenue data or the loans were originated under a loan product that does not consider business revenue in underwriting. We took into consideration the bank's significant nationwide niche lending programs when assessing the bank's performance regarding lending within its AA versus outside AA lending. More emphasis was placed on the bank's lending relative to aggregate performance.

In performing the analysis of investments, competition in the AA 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.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

The bank's rank and market share in loans is stronger than the rank and market share in deposits. We considered the substantial volume of loans originated through a subsidiary for insurance premium financing in the analysis.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Chicago MSA	42	1,847	9	83	1,981	98.6	100.0
Statewide	--	--	--	28	28	1.4	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. "--" data not available.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Chicago MSA	16,206	261,197	580	79,339	357,322	93.6	100.0
Statewide	--	--	--	24,445	24,445	6.4	--

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. "--" data not available.

According to FDIC Deposit Market Share data as of June 30, 2021, the bank ranked 12th out of 63 banks with a deposit market share of 2.4 percent in the AA, which is equivalent to the top 19.0 percent of banks in the AA.

The bank is not required to report its mortgage lending data and is not included in the 2020 peer mortgage data. The five largest home mortgage lenders have captured 27.5 percent of

the market based on the 2020 peer mortgage data. Home mortgage lending is not a primary product, and the bank generally refers home mortgage loans to an affiliate, WM.

According to 2020 peer small business data, the bank ranked 14th in the market of 223 small business lenders with a market share of 3.7 percent. The five largest small business lenders have captured 31.1 percent of the market.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent distribution.

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 proportion of home mortgage loans originated or purchased in LMI geographies exceeds both the percentage of owner-occupied housing units and the aggregate distribution of all lenders.

Small Loans to Businesses

The geographic distribution of small business loans reflects excellent distribution.

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 proportion of small business loans originated or purchased in LMI geographies exceeds the percentage of small businesses and the aggregate distribution of all reporting lenders.

Consumer Loans

The geographic distribution of consumer loans reflects excellent distribution.

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

The proportion of consumer originated or purchased loans in LMI geographies exceeds the percentage of households in those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of

loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is adequate.

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 proportion of home mortgage loans originated or purchased was near to the percentage of low-income families and exceeds the aggregate distribution of all reporting lenders. The bank did not originate or purchase any loans to moderate-income families.

The high cost of housing limits opportunities for LMI borrowers and the negative impact on economic conditions caused by the pandemic in 2020 may have limited opportunities for lending. Given this context, the performance under this criterion is considered adequate.

Small Loans to Businesses

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

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 proportion of loans to small businesses originated or purchased was significantly below the proportion of small businesses and near to the aggregate distribution of all reporting lenders.

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. Per table R, 34.2 percent of the small business loans have no revenue data. Given this context, the performance under this criterion is considered adequate.

Consumer Loans

The distribution of consumer loans among individuals of different income levels is adequate.

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

The proportion of consumer loans originated or purchased to low-income borrowers exceeds to the percentage of households. The proportion of consumer loans originated or purchased to moderate-income borrowers is below to the percentage of households.

Community Development Lending

The bank is a leader in making CD loans.

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

SCBT made 83 CD loans totaling $79.3 million, representing 45.5 percent of allocated tier 1 capital. CD loans included 19 loans totaling $31.4 million supporting community service, 29 loans totaling $17.4 million supporting affordable housing, seven loans totaling $14.7 million supporting economic development, and 28 loans totaling $15.8 million supporting revitalization and stabilization efforts. Of the 83 CD loans, 32 totaling $26.6 million were loan renewals.

Due to the pandemic in 2020, the SBA initiated the PPP loan program. The SBA implemented this program as a low-cost and forgivable loan program to help small businesses cover payroll costs, interest on mortgages, rent, and utilities during the pandemic. The bank originated 30 PPP loans totaling $21.1 million that qualify as CD within the AA.

Examples of CD loans in the AA include:

- $26.9 million to a nonprofit organization that serves the needs of infants, teens and adults that have serious and profound developmental disabilities and require specialized healthcare. The loans consist of a $9 million construction loan for a school building, a $7 million revolving line of credit (RLOC), which was renewed, and $3.9 million PPP loan. The school is a non-public institution that serves children with medical, learning, emotional and developmental disabilities. The majority of the organization's funding is provided through Medicaid as the majority of its clients are low-income.

- Three loans totaling $7.8 million to a corporation supporting economic development. The loans consisted of a $5 million RLOC, and two PPP loans totaling $2.8 million. Loan proceeds from the RLOC are for working capital needs of the business including sustaining the approximately 120 full-time employees and its continually growing workforce. The loan is a participation with the Illinois Advantage Program, which supports state businesses with projects that create or retain jobs and/or modernize their business to improve competitiveness and provide economic development.

- $150,000 RLOC, which was originated and renewed during the evaluation period to a nonprofit charter elementary school. Proceeds of the loan were used to provide financing for a new math and science school located in Elgin. The school is located in a moderate-income CT with a majority of the students from low-income families.

- The bank originated or renewed 22 multifamily loans totaling $17.4 million to various entities, which sustained approximately 384 affordable housing units in the AA.

Statewide

The bank originated 28 CD loans in the broader statewide area of Illinois totaling $24.4 million. This included 15 loans totaling $11.1 million supporting affordable housing, two loans totaling $4.8 million supporting economic development, and 11 loans totaling $8.5 million supporting community service to LMI individuals. Of the CD loans, nine totaling $6.1 million were loan renewals. The bank originated 11 PPP loans totaling $8.5 million that qualify as CD.

Product Innovation and Flexibility

The bank 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 LMI borrowers and small businesses within the AA.

Paycheck Protection Program

The bank made use of responsive flexible lending during the pandemic in 2020 by originating loans to stabilize small businesses and communities through the SBA PPP. The bank also worked with various nonprofit partners to increase awareness of PPP availability. During the evaluation period, the bank originated 789 PPP loans totaling $151.7 million in the AA and a combined total of 1,031 PPP loans totaling $219.4 million within the state of Illinois. This activity received positive consideration, as it helped stabilize small businesses and communities.

Other Programs

Money Smart Everyday Loan is offered as an alternative to payday loans. These loans provide unsecured financing from $500 to $2,500 as an alternative to payday lenders with lower interest rates and up to 24-month repayment terms. The bank originated 39 loans totaling $76,350 in the AA.

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. There is no upfront deposit required from the borrower. 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 22 Money Smart loans totaling $14,500 in the AA.

Easy Access Line of Credit (LOC) 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 through secured and unsecured term loans. During the evaluation period, the bank originated 54 Easy Access LOC totaling $3.4 million and two Easy Access Installment loans totaling $10,500 in the AA.

The bank participates in SBA programs including the 504-loan program, 7a loan program, and the Express program. During the evaluation period, a total of 14 loans totaling $10.6 million were originated under these programs in the AA.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives. Qualified investments and grants primarily supported efforts to address needs for affordable housing, economic development, and community services.

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	6	3,225	211	11,945	217	88.2	15,170	87.4	2	534
Regional	2	778	27	1,407	29	11.8	2,185	12.6	4	1,062

* 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 7reporting system.

Qualified investments within the Chicago MSA totaled $15.2 million, with current period investments of $11.5 million, prior period investments of $3.2 million, and qualified grants of $402,335. Investments benefiting the AA during the evaluation period represent 8.7 percent of allocated tier 1 capital. The bank also had unfunded commitments of $534,044.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of $3.2 million in bonds, small business investment corporations (SBIC), and mortgage-backed securities funding housing in LMI areas in the AA.

Examples of qualified investments in this AA include:

- Over $2.5 million in four Minority Deposit Institutions (MDIs) serving the region. The MDIs provide safe and affordable financial products to LMI individuals and communities, as well as financial counseling, seminars, and further investments into the community. This investment supports services for individuals with poor credit histories, a lack of financial literacy, or a lack of financial resources.

- A $1 million investment in two Low-Income Housing Tax Credits (LIHTC) with one of the nation's leading syndicators. The LIHTC plays an integral role in creating affordable housing options, revitalizing communities, and strengthening local economies.

- $350,000 in an Equity Equivalent Investments (EQ2) to nonprofit Community Development Financial Institutions (CDFI) that are involved in affordable housing, social service, and economic initiatives that benefit LMI families. An EQ2 is an investment of equity in a nonprofit lender, which enhances the nonprofit's flexibility to support LMI communities and small businesses.

Examples of qualified grants in the AA include:

- $81,000 in two grants to a nonprofit organization providing low-income students with K-12 education options through private school scholarships. The grants also qualify for the Illinois Invest in Kids Scholarship Tax Credit Program for donations made to select Scholarship Granting Organizations.

- $37,000 in eight grants benefiting a nonprofit organization providing community service to LMI children. This is a volunteer led organization that advocates for the best interests of abused and neglected children within the juvenile and probate court systems.

- $30,000 in two grants to a nonprofit organization benefiting LMI young people. The mission of the organization is to enable all young people, especially those most in need, to reach their full potential as productive and responsible citizens. Professional mentors use enriching programs to help kids feel safe, connect with others and build the confidence they need to reach their potential.

Regional

We also considered qualified investments that served a broader regional area, including neighboring states. In the current period, the bank invested $1.2 million and provided qualified grants of $257,323. The bank also had $840,200 in unfunded commitments remaining at the end of the evaluation period, which consisted of two SBICs.

The bank continued to hold two prior period SBIC investments totaling $777,559 that have an unfunded commitment of $222,441.

The bank made grants in a long-term commitment, which provided $233,333 in funding to a university whose goal is to address tuition costs, which strain LMI families. While partnering with WFC banks, this donation provides support through scholarships to low-income students as well as first generation students.

SERVICE TEST

The bank's performance under the Service Test in the state of 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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago MSA	100.0	7	100.0	0.0	42.9	28.6	28.6	1.0	14.9	35.9	48.2

The bank has seven branches in the AA, with three in a moderate-income CT. There are no branches in low-income CTs. The percentage of the branches located in a moderate-income area exceeds the percentage of the population residing in the geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago MSA	0	4	0	0	-1	-3

To the extent changes have been made, the bank's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In November 2016, through an acquisition, SCBT added two branches, which were located in moderate- and middle-income CTs. In November 2019, through another acquisition, the bank added five branches located in middle- and upper-income CTs. In February 2020, the bank permanently closed two branches located in middle- and upper-income CTs in Geneva and St. Charles. In April 2021, the bank permanently closed two branches located in upper-income CTs in Geneva and South Elgin. The closures were due to the proximity to existing SCBT branch locations.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, mobile banking, online banking, remote deposit service, and telephone banking. SCBT has seven ATMs in the AA, of which three are deposit-taking ATMs in a moderate-income CT of the AA. We did not place significant weight on alternative delivery systems, as the bank did not

maintain or provide metrics to determine their effectiveness in helping meet the needs of LMI individuals.

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

During the pandemic, the bank offered additional services such as curbside banking, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds, overdraft fees, and early withdrawal penalties. With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. The bank received positive consideration for these activities in response to the pandemic.

Community Development Services

The bank is a leader in providing CD services.

CD Services were effective and responsive in addressing the community's needs. During the evaluation period, 49 bank employees from various lines of business partnered with 40 organizations and contributed a total of 5,637 hours supporting LMI individuals and families. This included serving on committees and boards for 27 various organizations that promote affordable housing, community services, and economic developments for LMI communities within the AA. Services reflected ongoing relationships with several organizations in the AA.

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

- Seven employees provided 463 hours of board and volunteer service to a nonprofit organization. The mission of the organization is to align resources and collaborate with other organizations in support of public-school strategies to raise student achievement. Their objective is to create responsible, productive, contributing members of society and advance the economic and social well-being of communities served by the local school district. A majority of the students are from low-income families.

- Two employees provided 398 hours of board and committee service to a nonprofit organization. The organization is volunteer led and advocates for the best interests of abused and neglected children within the juvenile and probate court systems. A majority of the children are from low-income families.

- Two employees provided 145 hours of board, committee, and volunteer service to a nonprofit organization. The agency helps predominantly low-income Hispanic immigrants by providing individual and family counseling, bilingual advocacy, information and referral, immigration, and naturalization services, parenting skills training, community education, and youth programs. Furthermore, this organization provides employment aid, parenting skills classes, an emergency food pantry, and educational seminars, amongst others.

- Two employees provided 76 hours of board and volunteer service to a nonprofit organization that facilitates access to resources that promote economic growth to Latino

small businesses. The organization advocates for legislation critical to the continued economic development of Illinois' Hispanic business community as well as sustained economic development throughout the area. Furthermore, they are committed to helping members create and grow job opportunities as they work towards a stronger and more prosperous tomorrow.

FDIC Money Smart

The bank leverages the FDIC Money Smart financial education program, which helps individuals of all ages enhance their financial skills and create positive banking relationships. The Money Smart program provides basic financial concepts to students in kindergarten through 12th grade and training for adults in many different life stages and financial situations. The program reaches adults new to the country, adults with disabilities, adults starting or changing careers, and adults going through significant life events such as expanding their families or purchasing or renting their first homes. Curriculum includes education on preventing elder financial exploitation and for small businesses related to starting and managing a business.

During the evaluation period, the bank employees provided 383 hours using the FDIC Money Smart Financial Program to small business and LMI individuals in the AA.

PPP Resource Centers

In response to the pandemic in 2020, WFC developed, implemented, and staffed PPP Resource Centers. The bank staffed the centers with small business lenders that were knowledgeable in the PPP application portal and process. The resource centers made expertise and equipment available to small businesses that did not have access to these types of resources. One of SCBT's branches served as a PPP Resource Center. Five bank employees provided 285 hours of support to the resource centers which were open from January through April 2021.

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:	HMDA and CRA: 01/01/2020 to 12/31/2021 CD Activities & Retail Services: 06/07/2016 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business, and consumer loans. Community development loans, qualified investments, and community development services.	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State of Illinois		
Chicago-Naperville-Elgin MSA	Full-Scope	Counties of DuPage and Kane

Appendix B: Summary of MMSA and State Ratings

St. Charles Bank & Trust Company Ratings				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
St. Charles Bank	Outstanding	Outstanding	High Satisfactory	Outstanding
State:				
State of Illinois	Outstanding	Outstanding	High Satisfactory	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business,

or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

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

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

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

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

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

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

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

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

original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

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.

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.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-2021

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	% 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	42	16,206	100.0	0.5	7.1	0.2	10.1	33.3	6.3	34.7	33.3	32.1	54.6	26.2	61.5	0.0	0.0	0.0
Total	**42**	**16,206**	**100.0**	**0.5**	**7.1**	**0.2**	**10.1**	**33.3**	**6.3**	**34.7**	**33.3**	**32.1**	**54.6**	**26.2**	**61.5**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2020 - 12/31/2021 Bank Data, 2020 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 2020-2021

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Chicago MSA	42	16,206	100.0	16.3	9.5	4.1	14.9	0.0	14.1	19.1	4.8	20.0	49.7	42.9	48.3	0.0	42.9	13.5
Total	**42**	**16,206**	**100.0**	**16.3**	**9.5**	**4.1**	**14.9**	**0.0**	**14.1**	**19.1**	**4.8**	**20.0**	**49.7**	**42.9**	**48.3**	**0.0**	**42.9**	**13.5**

Source: 2015 ACS Census; 01/01/2020 - 12/31/2021 Bank Data, 2020 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 — 2020-2021

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	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago MSA	1,847	261,197	100.0	0.7	2.7	0.7	7.4	14.3	6.7	34.1	41.5	37.6	57.8	41.5	55.0	0.0	0.0	0.0
Total	**1,847**	**261,197**	**100.0**	**0.7**	**2.7**	**0.7**	**7.4**	**14.3**	**6.7**	**34.1**	**41.5**	**37.6**	**57.8**	**41.5**	**55.0**	**0.0**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2020 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 — 2020-2021

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	1,847	261,197	100.0	49,723	82.9	32.1	36.5	7.2	33.7	10.0	34.2
Total	**1,847**	**261,197**	**100.0**	**49,723**	**82.9**	**32.1**	**36.5**	**7.2**	**33.7**	**10.0**	**34.2**

Source: 2019 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2020 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 2020-2021

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	78	1,123	156.0	0.8	2.6	12.8	55.1	37.3	23.1	49.0	19.2	0.0	0.0
Total	**78**	**1,123**	**156.0**	**0.8**	**2.6**	**12.8**	**55.1**	**37.3**	**23.1**	**49.0**	**19.2**	**0.0**	**0.0**

Source: 2015 U.S Census; 01/01/2020 - 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 2020-2021

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	78	1,123	278.6	18.1	65.4	14.3	11.5	17.1	10.3	50.4	11.5	0.0	1.3
Total	**78**	**1,123**	**278.6**	**18.1**	**65.4**	**14.3**	**11.5**	**17.1**	**10.3**	**50.4**	**11.5**	**0.0**	**1.3**

Source: 2015 U.S Census; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0