



## **PUBLIC DISCLOSURE**

July 21, 2025

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

Northbrook Bank & Trust Company, National Association  
Charter Number: 25199

1100 Waukegan Road  
Northbrook, Illinois 60062

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 Northbrook Bank & Trust, National Association (NBT or Bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Northbrook Bank & Trust, 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 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 had an excellent level of qualified CD investments and grants across the rating area and at the regional level. The bank exhibited excellent responsiveness to credit and CD needs.
- The Service Test rating is based on performance in the State of Illinois which reflects service delivery systems that were accessible to geographies and individuals of different income levels. The bank was a leader in providing CD services.

**Innovative or Flexible Lending Products** - The bank offers innovative and/or flexible loan products targeted to low- and moderate-income (LMI) borrowers and small businesses that had a positive impact on the lending test rating. A summary of the bank's innovative and/or flexible loan products or programs are as follows:

- *Small Business Administration* – Federally guaranteed loan programs (504, 7a, and Express) to help provide financing to small businesses.
- *Easy Access Revolving Line of Credit* – Provides small businesses secured and unsecured financing up to \$250,000 to fund short-term cash needs. The product was designed to finance inventory growth and provide interim funding pending receipt of account receivables payments. Additionally, variable rate financing up to \$10,000 is available to support businesses that are less than one year old.

- *Easy Access Installment Loan* – Provides small businesses longer-term secured and unsecured financing up to \$250,000. This product was designed to finance the acquisition of fixed assets, debt refinancing, and terming out of existing lines of credit or credit card debt. The bank has established tiers within this product to accommodate a variety of business types and circumstances.
- *Small Business Overdraft Protection Line* – Provides small businesses short-term funding when experiencing cash flow constraints. No application, closing, or annual fees are charged for this product.
- *Money Smart Everyday Loan* – Provides an alternative to higher cost financing options, with a fixed interest rate of prime plus 5 percent and loan terms of 12 or 24 months. Loan amounts range from \$500 to \$5,000, which represents an increase from \$2,500 during the evaluation period. No loan fees are charged for this product and applicant credit scores are not considered. Alternative credit history options such as payment history for rent, utilities, or cell phone are accepted to supplement traditional trade line information.
- *Money Smart Certificate of Deposit Secured Loan* – Provides a way to build or repair credit history with a loan whose proceeds are used to fund a certificate of deposit. Loan amounts range from \$500 to \$2,500. The loan earns the certificate of deposit's interest rate plus two hundred basis points. No loan fees are charged for this product. Applicants credit scores and credit histories are not considered.

## Lending in Assessment Area

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

The bank originated and purchased 2.6 percent of its total loans inside the bank's AAs 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.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024		
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Home Mortgage	125	50.40	123	49.60	248	76,354	30.98	170,117	69.02	246,471		
Small Business	1,271	2.33	53,194	97.67	54,465	114,108	4.62	2,357,679	95.38	2,471,787		
Small Farm	0	0	88	100.00	88	0	0	11,156	100.00	11,156		
Consumer	47	65.28	25	34.72	72	4,527	47.56	4,991	52.44	9,518		
<b>Total</b>	<b>1,443</b>	<b>2.63</b>	<b>53,430</b>	<b>97.37</b>	<b>54,873</b>	<b>194,989</b>	<b>7.12</b>	<b>2,543,943</b>	<b>92.88</b>	<b>2,738,932</b>		

Source: 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

The bank's use of nationwide lending programs, First Insurance Funding (FIRST) and Wintrust Mortgage (WM), impacts the ratio of loans located inside the bank's AAs. Small business loans are the bank's primary loan product based on the volume of loans by number. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

During the evaluation period 123 or 49.6 percent of home mortgage loans made outside of the AA were purchased from WM. During the same evaluation period, 53,194 or 97.7 percent of small business loans made outside of the AA were purchased from FIRST.

## Description of Institution

Northbrook Bank and Trust Company National Association (NBT or the bank) is a \$6.0 billion intrastate bank headquartered in Northbrook, Illinois. The bank is a wholly owned subsidiary of Wintrust Financial Corporation (WFC). As of December 31, 2024, WFC is a \$64.9 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, western Michigan, and Southwest Florida by way of their 16 wholly owned banking subsidiaries and more than 200 bank locations.

WFC locations provide a wide range of lending and deposit products and services to their customers. WFC maintains several nationwide niche products centralized at various charters. These specialty products include wealth management advisory services, leasing financing, insurance premium financing through FIRST, short-term account receivable financing, administrative services outsourcing, franchise lending, firm partnership loans, and financial solutions for mission-based organizations. Residential mortgage applications are processed through WM. WM, a division of Barrington Bank & Trust, is a national residential mortgage operation. WM offers a wide variety of retail mortgages and originates nearly all the WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 16 WFC banks for their portfolio.

The bank operates seven full-service branch offices. Each location has one or more full-service Automated Teller Machines (ATMs). Since the last CRA Public Evaluation (PE), NBT opened a new branch location. The new branch, Wheeling Bank and Trust, was established in December 2024.

The bank closed the Des Plaines Bank & Trust branch in March 2022. The branch was in a middle-income census tract (CT) at 9390 Ballard Rd., Des Plaines, IL 60016. The branch was closed due to its low traffic and proximity to the Village Bank & Trust locations: Des Plaines 1.5 miles, Park Ridge 2.5 miles and Mount Prospect 4 miles. The bank also closed their Northbrook branch at 875 Sanders Rd, Northbrook IL 60062 in December 2024 located in an upper-income CT. The branch was closed in anticipation of the Wheeling Bank & Trust Branch opened in December 2024, located in a moderate-income CT, approximately 2.5 miles away.

As of December 31, 2024, NBT reported total loans of \$3.8 billion, representing 63.5 percent of total assets. As of December 31, 2024, the loan portfolio is primarily a mix of commercial loans (\$1.95 billion or 51.1 percent of net loans and leases), non-farm non-residential loans (\$527.4 million or 13.8 percent of net loans and leases), and consumer loans (\$494.2 million or 12.9 percent of net loans and leases). The bank has \$473 million in tier 1 capital.

According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) deposit market share report in the state of Illinois, NBT had 0.9 percent market share making it the 19th largest deposit holder out of 157 deposit-taking financial institutions in the Chicago-Naperville-Elgin-IL-IN MSA. National competitors like BMO Bank N.A, JP Morgan Chase, Bank of America, The Northern Trust Company, CIBC Bank, and Fifth Third Bank control a combined 64 percent of the deposit market share.

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. NBT's CRA performance was rated "Outstanding" in the last PE dated May 2, 2022.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for all Lending Test, Investment Test, and Service Test activities is January 1, 2022, through December 31, 2024.

### Lending Test

The OCC evaluated home mortgage loans, consumer loans, and small loans to businesses under the Lending Test. To be considered a primary loan product there must have been at least 20 loans originated or purchased within the AA throughout the evaluation period. The OCC did not consider small loans to farms in this evaluation, as they did not constitute a substantial majority of the bank's business or management did not request consideration of that product category. No affiliate activity was included in this evaluation. The OCC generally gave equal weight to geographic and borrower distribution components of the Lending Test. The OCC also considered the volume of CD loans and the degree of responsiveness of those loans to the needs in the community. The bank's lending responsiveness was evaluated by comparing its market share and rank in deposits to its market share and rank across various loan products.

### Investment Test

When conducting analysis under the investment test, the OCC compared the dollar amount of CD investments and donations made to tier 1 capital. The analysis also included evaluating how responsive investments and donations were to the needs of the community and if there were any impediments to meeting those needs. The OCC considered the volume of investments made during the current evaluation period and those made in prior evaluation periods that remained outstanding. Investments made in a prior period were considered at the book value of the investment as of December 31, 2024. Current-period investments were considered at their original investment amount, even if that amount is greater than the current book value of the investment. Current-period investment totals are based on the amount used for bank reporting for financial statements and the Consolidated Reports of Condition and Income that governed the timing for recognizing investment totals. Unfunded commitments consist of legally binding investment commitments that are tracked and recorded in the bank's financial reporting system.

### Service Test

The OCC gave primary consideration to the bank's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. The OCC focused on the accessibility of branches to LMI geographies and individuals, including the impact of opening and closing of branches. Adjacent branches, which are branches in middle- or upper-income (MUI) CTs within proximity of LMI geographies, that serve and enhance accessibility for LMI customers, were also considered. The OCC evaluated the range and consistency of

products and services offered by the bank through its branch network with emphasis on accessibility to LMI borrowers. The OCC specifically focused on any differences in branch hours and services in LMI geographies compared to those in MUI geographies. The OCC also evaluated the bank's record of providing CD services. The OCC's primary consideration was the responsiveness of the services to community needs.

## **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Rating**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The MMSA and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the "Scope" section under each MMSA and State Rating section for details regarding how the areas were 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.

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

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Illinois

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

The major factors that support this rating include:

- The bank exhibited excellent geographical distribution of loans in its AA.
- Lending levels reflected good responsiveness to the AAs credit needs.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The institution made extensive use of innovative and/or flexible lending practices to serve credit needs.
- The bank had an excellent level of qualified investments.
- The bank was a leader in providing CD services.
- Service delivery systems were accessible to geographies and individuals of different income levels.

### Description of Institution's Operations in Illinois

NBT has one delineated AA in Illinois, the Chicago-Naperville-Elgin IL-IN MSA which includes the northern portion of Cook County and the southern portion of Lake County. The AA consists of 191 whole CTs in the northern portion of Cook County (156 tracts) and the southern portion of Lake County (35 tracts) in the State of Illinois. The AA meets the requirement of the regulation and does not arbitrarily exclude low-and moderate- income (LMI) geographies. According to the FFIEC 2024 Census, the AA consists of 191 CTs, of which there are 2 low-income CTs and 18 moderate-income tracts.

The release of the 2020 Census data impacted the bank's LMI CT distribution in the AA. There were 6 previously middle-income CTs that changed to moderate, as well as 2 previously moderate-income CTs that changed to low-income CTs in Cook County. Prior to the most recent census changes

the bank did not have any low-income tracts in the AA. The most impactful changes were the portion of the bank's AA located in Cook County.

The bank has seven full-service branch offices. The newest location, Wheeling Bank and Trust, was established in December 2024. Each location has one or more full-service Automated Teller Machine (ATM):

## **Market Profile**

The Chicago-Naperville-Elgin IL-IN MSA continues to exhibit robust income levels and a solid labor market. While unemployment has edged upwards slightly, job growth in health, leisure, government, and finance is helping offset losses in areas like professional services and manufacturing. According to the Federal Reserve Economic Data, the annual 2024 unemployment rate for the Chicago-Naperville-Elgin IL-IN MSA was 4.5 percent. The unemployment rate has trended upwards from 3.9% in 2022 and 4.2 percent in 2023. The unemployment rate in the MSA is higher than the 2024 reported rate for IL of 4.3 percent and the US rate of 3.8 percent. The 2024 Illinois Department of Employment Security for 2024, indicates there were greater challenges at the county level as evidenced by Lake County's unemployment rate of 5 percent and Cook County's unemployment rate of 5.4 percent. The Moody's Analytics report projects the area's economy will make slow progress in the short-term. The median household income is significantly higher than both state and national averages, signaling relatively strong household purchasing power in the metro region. Per capita incomes also outperform broader benchmarks suggesting economic resilience and a relatively prosperous population overall.

## **Affordability**

Based on data from the U.S. Census, low-income families within the Chicago-Naperville-Elgin, IL-IN MSA earned less than \$3,859 monthly and moderate-income families earned less than \$4,575 monthly. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30.0 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,158 for low-income borrowers and \$1,373 for moderate-income borrowers. Assuming a 30-year mortgage with a 6.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses the mortgage payment for a home located at the Chicago-Naperville-Elgin IL-IN MSA would be \$2,550. LMI borrowers would not likely be able to afford a mortgage loan in this AA.

Based on data from the U.S. Census, low-income families within the Lake County, IL MD earned less than \$4,575 monthly and moderate-income families earned less than \$5,400 monthly. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30.0 percent of the applicant's income, this calculated to a maximum monthly mortgage payment of \$1,373 for low-income borrowers and \$1,620 for moderate-income borrowers in the Asssuming a 30-year mortgage with a 6.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses the mortgage payment for a home located at the Lake County MD would be \$2,550. LMI borrowers would not be likely to afford a mortgage in this AA.

## **Community Contacts**

Examiners reviewed information from three community contacts made within the AA during the evaluation period to determine community needs. The community contacts included an interstate consulting group for CRA compliance, a housing coalition for Spanish speakers, and a credit counseling service. Primary community needs include improving the availability of affordable housing, access to

flexible credit for small businesses and LMI communities, loans to minority women and low-income entrepreneurs, and financial literacy counseling.

## Chicago MSA

Assessment Area(s) - Chicago MSA 2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
<b>Geographies (Census Tracts)</b>	191	1.05	9.42	28.80	59.69	1.05
<b>Population by Geography</b>	880,991	1.19	11.98	30.80	56.03	0.00
<b>Housing Units by Geography</b>	341,329	1.01	12.25	31.55	55.19	0.00
<b>Owner-Occupied Housing by Geography</b>	235,224	0.96	8.51	29.72	60.81	0.00
<b>Occupied Rental Units by Geography</b>	84,640	1.13	22.36	37.50	39.01	0.00
<b>Vacant Units by Geography</b>	21,465	1.13	13.28	28.16	57.42	0.00
<b>Businesses by Geography</b>	45,672	1.61	9.99	30.46	57.94	0.00
<b>Farms by Geography</b>	699	1.14	9.01	30.76	59.08	0.00
<b>Family Distribution by Income Level</b>	222,032	15.94	14.12	17.24	52.69	0.00
<b>Household Distribution by Income Level</b>	319,864	20.12	13.19	15.58	51.12	0.00
<b>Unemployment rate (%)</b>	3.95	7.85	4.32	4.57	3.43	0.00
<b>Households Below Poverty Level (%)</b>	7.39	20.58	12.24	8.64	5.35	0.00
<b>Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)</b>	\$92,622			<b>Median Housing Value</b>	\$370,500	
<b>Median Family Income (29404 - Lake County, IL MD)</b>	\$112,326			<b>Median Gross Rent</b>	\$1,408	
<b>Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2024</b>	\$109,800			<b>Families Below Poverty Level</b>	4.62	
<b>Median Family Income (29404 - Lake County, IL MD) for 2024</b>	\$129,600					
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Scope of Evaluation in Illinois

We conducted a full-scope review of the bank's only AA, the Chicago-Naperville-Elgin, IL-IN MSA.

For the Lending Test, we gave significantly more weight to performance relative to small business lending. Small loans to businesses were given more weight than home mortgage loans when arriving at the bank's overall lending performance rating based on the volume of loans.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

## Lending Activity

Lending levels reflect a good responsiveness to AA credit needs.

Table 3: Lending Activity									2022 - 2024
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Chicago MSA	125	1,271	0	0	47	1,443	100.00	100.00	
Total	125	1,271	0	0	47	1,443	100.00	100.00	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Chicago MSA	76,354	114,108	0	0	4,527	194,989	100.00	100.00	
Total	76,354	114,108	0	0	4,527	194,989	100.00	100.00	

Source: 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.00%

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

Lending levels reflect good responsiveness to AA credit needs. According to the FDIC Summary of Deposit Report as of June 30, 2024, the bank held \$4.1 billion in deposits. The bank's deposits represent a market share of 0.9 percent.

According to the 2023 peer HMDA data, the bank originated 25 HMDA loans totaling \$22.2 million. This represented a market share of 0.3 percent by number and 0.5 percent by dollar volume, ranking the bank 73<sup>rd</sup> out of 439 lenders in the AA. Home mortgage lending is generally referred to its affiliate, WM. The bank's rank in HMDA lending is weaker than the ranking for deposits.

According to the 2023 peer small business data, the bank originated 263 small business loans totaling \$16.8 million, capturing 0.2 percent by number and 0.9 percent by dollar volume. The bank's market share ranked 26<sup>th</sup> out of 226 lenders in the AA. The bank's rank in small business lending is weaker than the ranking for deposits.

## Distribution of Loans by Income Level of the Geography

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

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

Refer to Table 7 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

In 2022 through 2024, the geographic distribution of home mortgage was excellent. The portion of bank home mortgage loans to low-income geographies was near to the percentage of owner-occupied housing and exceeded the aggregate industry distribution of home mortgage loans to those geographies. The portion of bank home mortgage loans to moderate-income geographies exceeded the percentage of owner-occupied housing and met the aggregate industry distribution of home mortgage loan to those geographies.

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

Refer to Table 9 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

In 2022 through 2024, the geographic distribution of small loans to businesses was excellent. The bank's percentage of small loans to businesses in LMI geographies exceeded both the percentage of business in those geographies and the aggregate distribution of loans

### ***Consumer Loans***

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

In 2022 through 2024, the geographic distribution of consumer loans was excellent. The proportion of bank consumer loans in LMI geographies exceeded 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 a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

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

Refer to Table 8 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In 2022 through 2024, the borrower distribution of home mortgage loans was good. The proportion of bank home mortgage loans to low-income borrowers was well-below the percentage of low-income families but exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of bank home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families but was near to the aggregate industry distribution of home mortgage loans to those borrowers.

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

Refer to Table 10 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

In 2022 through 2024, the borrower distribution of small loans to businesses was good. The proportion of bank loans to businesses with revenues less than \$1.0 million was below the percentage of businesses but exceeded the aggregate industry distribution of loans to those businesses.

## ***Consumer Loans***

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

In 2022 through 2024, the borrower distribution of consumer loans was excellent. The proportion of bank loans to low- and moderate-income borrowers exceeded the percentage of households in the income categories.

## **Community Development Lending**

The institution was a leader in making CD loans.

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

CD lending is excellent and had a significantly positive impact on the bank's overall Lending Test performance in the Chicago-Naperville-Elgin, IL-IN MSA. The bank originated 27 CD loans totaling \$72.9 million, or 15.4 percent of tier 1 capital. The bank was responsive to credit needs in the AA with three CD loans totaling \$2.2 million benefiting affordable housing, 10 CD loans totaling \$17 million benefiting community services, 12 CD loans totaling \$31.3 million supported economic development initiatives, and two CD loans totaling \$22.4 million supported revitalization or stabilization in the AA.

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

- A \$11.5 million loan to support a senior living community and create jobs in a moderate-income area. The project utilized a vacant building in a moderate-income tract to construct an 83-unit facility for LMI seniors. The project created 25 jobs of which 22 are low/moderate income jobs.
- A \$ 1 million loan to support affordable housing through the construction of a 25-unit supportive living project. The facility will provide 13 units of supportive housing and 11 units of affordable housing. Low- income housing tax credits (LIHTCs) are part of the financing structure.
- A \$1.1 million SBA 504 loan to support growth prospects of a small business. New loan for the purchase of a 10-unit multifamily building in a moderate-income tract. The building has nine 1-bedroom units that rent between \$950-\$975 and one 3-bedroom unit that rents for \$2,000. The monthly rent is below the HUD fair market rents for the area which are \$1,430 and \$2,090, respectively. The loan provides affordable housing to the community.

## **Broader Regional and National CD Loans**

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

CD lending in the broader regional area included 20 CD loans totaling \$46 million. The bank originated 13 CD loans totaling \$7.5 million benefitting affordable housing and seven CD loans totaling \$38.5 million supported revitalization or stabilization in the broader regional area.

CD lending in the broader region had a neutral impact and supported the Lending Test conclusion.

## Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. We considered the loan programs which provided opportunities with direct benefit to low- and moderate-income borrowers and small businesses within the AA. Refer to pages 3-4 for product descriptions.

### Small Business Administration (SBA) Loans

During the evaluation period, the bank generated 14 SBA loans for a total of \$8.2 million in the AA.

### Money Smart Products

During the evaluation period, the bank originated 18 loans totaling \$33,700 in the AA.

### Easy Access Installment Programs, Line of Credit, and Overdraft Protection

During the evaluation period, the bank originated 530 loans within these three programs totaling \$17.3 million in the AA.

## INVESTMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on full-scope review, the bank's performance in the Chicago-Naperville-Elgin, IL-IN MSA was excellent. We considered the opportunities that directly benefitted the AA and the bank's capacity to address those needs.

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

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. Qualified investments and grants primarily supported needs for affordable housing and economic development.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago-Naperville-Elgin, IL-IN MSA	20	11,536	200	50,540	220	84.29	62,076	94.42	2	3,005
Broader Statewide or Regional Area	3	2,054	34	698	37	14.18	2,752	4.20	4	1,402
National	0	0	4	910	4	1.53	910	1.38	0	0
<b>Total</b>	<b>23</b>	<b>13,591</b>	<b>238</b>	<b>52,148</b>	<b>261</b>		<b>65,738</b>		<b>100</b>	<b>4,407</b>

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

During the evaluation period, Northbrook Bank & Trust made 261 qualified investments and grants totaling approximately \$65.7 million, representing 13.9 percent of the bank's tier 1 capital, across its

AA, broader statewide or regional area and nationwide. These investments included 238 originated during the current period and 23 outstanding from prior periods. The bank also maintained six unfunded commitments totaling \$4.4 million, reflecting a sustained commitment to CD activities.

Current and prior period investments, and donations were responsive to the community needs. Investment activity primarily focused on affordable housing, small business development, and expanding access to financial services for LMI individuals and geographies. In addition to investments, the bank awarded grants to nonprofit organizations providing mental health services, academic and financial support to LMI youth, and financial empowerment initiatives, including budgeting and money management education targeted to LMI women.

The following are examples of qualified investments in the AA:

- The bank invested \$9.7 million during the current period and continued to hold a \$1 million prior-period investment in a CD fund. The fund provided financing for affordable housing, small businesses, and economic development, including loans to LMI borrowers, three multi-family housing projects, and two small business loans supporting 169 jobs in underserved areas.
- An \$8.8 million investment was made in a community impact bond fund supporting affordable housing, healthcare, enterprise development, and environmental sustainability. The bank's portion financed four affordable housing loans to moderate-income buyers, including properties in moderate-income CTs and two first-time homebuyer loans within the bank's AA.
- The bank invested \$6 million in a national affordable housing fund. This investment, combined with affiliate bank contributions, supported a low-income housing tax credit (LIHTC) project in Evanston, Illinois. The 60-unit development served residents earning 30 to 80 percent of area median income (AMI), including 18 units reserved for households earning 30 percent AMI with project-based vouchers.
- Two municipal bond purchased totaling \$3.06 million funded improvements to park and recreational facilities within the AA. The proceeds supported the land acquisition and infrastructure upgrades in moderate-income CTs, enhancing access to amenities for low-income residents.

### **Broader Statewide or Regional Area**

Examiners also considered qualified investments made in the broader statewide or regional area. While not specifically targeted to the AA, these investments supported affordable housing, economic development, and small business financing benefiting LMI individuals and geographies across Illinois and surrounding states.

During the evaluation period, the bank made three current-period investments totaling \$494,000, continued to hold three prior-period investments totaling \$2.1 million, and maintained four unfunded commitments totaling \$1.4 million. These included equity investments in Small Business Investment Companies (SBICs) that financed lower middle-market businesses and certificates of deposit placed with community-focused financial institutions. SBIC investments held by the bank had a combined outstanding balance of \$2.1 million, with \$446,000 in remaining unfunded commitments.

The bank also provided \$204,000 in grants within the broader regional area, which supported affordable housing, community services, and neighborhood stabilization initiatives serving LMI communities.

## National

At the national level, Northbrook Bank & Trust made four qualified investments totaling approximately \$910 thousand during the current evaluation period. These investments consisted of certificates of deposit placed with certified CD financial institutions (CDFIs) and minority depository institutions (MDIs). These institutions focus on promoting financial inclusion and expanding access to capital in underserved and economically distressed communities nationwide.

The bank's investments supported initiatives aimed at strengthening financial services and credit availability for LMI individuals and underserved populations. For example, a \$225 thousand certificate of deposit was made to a California-based CDFI that provides responsible financing and financial services to underserved individuals and small businesses.

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

## SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago-Naperville-Elgin, IL-IN MSA was good.

## Retail Banking Services

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

Table 5: Distribution of Branch Delivery Systems											2022-2024		
Assessment Area	Deposits		Branches				Population						
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Chicago-Naperville-Elgin IL-IN MSA	100.00	7	100.00	0	14.3	0	85.7	0	1.19	11.98	30.80	56.03	0
<b>Total</b>	<b>100.00</b>	<b>7</b>	<b>100.00</b>	<b>0</b>	<b>14.3</b>	<b>0</b>	<b>85.7</b>	<b>0</b>	<b>1.19</b>	<b>11.98</b>	<b>30.80</b>	<b>56.03</b>	<b>0</b>

Source: FFIEC File – 2020, 2024 Census  
1/1/2022 - 12/31/2024 Bank Data  
Due to rounding, totals may not equal 100.0%.

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only. The bank did not have any branches in low-income geography. The bank's branch distribution in low-income geography is significantly below the percentage of the population living within the geography. The bank's branch distribution in moderate-income geographies exceeded the percentage of the population living within those geographies. Two branches located in upper-income geographies are near to and served residents of low- and moderate-income geographies, of which are less than 3.5-mile radius of a branch. These branches improved access and had a positive impact on the service delivery systems conclusion.

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. Northbrook has eight deposit-taking ATMs in the AA, of which two are deposit-taking ATMs in a moderate-income CT. Services, including where appropriate, business hours, did not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. All branches in the MSA are open Monday through Friday from 9:00 am to 5:00 pm. All retail banking services offered are available in LMI geographic areas.

**Table 6: Distribution of Branch Openings/Closings**

Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Chicago-Naperville-Elgin IL-IN MSA	1	2	0	+1	-1	-1	0
<b>Total</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>+1</b>	<b>-1</b>	<b>-1</b>	<b>0</b>

1/1/2022 - 12/31/2024 Bank Data.

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

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

NBT has a total of seven branches in the AA, six are in upper-income tracts and one in a moderate-income tract, along with eight deposit taking ATM locations. During the evaluation period, the bank opened one new branch in a moderate-income tract, located 2.5 miles from a recently closed branch. This new location improves access for communities in moderate-income tracts by reducing travel barriers such as the Potawatomi Woods Preserve. The bank also closed two branches during the evaluation period. The Des Plaines Bank & Trust branch in a middle-income CT closed due to low traffic and its proximity to the Village Bank Trust branches (Des Plaines 1.5 miles, Park Ridge 2.5 miles, and Mount Prospect 4 miles). The Northbrook branch in an upper-income CT was closed and replaced with the Wheeling Bank & Trust branch which is located in a moderate-income CT.

## Community Development Services

This institution was a leader in providing CD services.

CD services were effective and responsive in helping the bank address the community needs. During the evaluation period, bank employees provided 4,621 service hours serving as board and committee members for organizations that aided in affordable housing, community services and economic developments for communities within the AA.

The following are examples of CD services provided:

- A bank employee provided 540 hours of board service to a nonprofit focused on repairing homes and revitalizing communities. Through collaborating with other communities, the organization provides free repair and improvements to low-income homeowners, elderly individuals, people with disabilities, families with children, veterans, and nonprofit organizations that need facility repairs.

- A bank employee provided 1,459 hours of board service to a college preparatory school that caters to students from LMI households. The school provides a Corporate Work Study program that allows students to work five full days per month to pay for their education while gaining a professional work experience.
- Two bank employees provided 384 hours as board members and a tutor to a nonprofit organization that provides activities-based mental health care for children and adolescents within the AA. A few of the services provided to LMI clients are individual and group therapy, sexuality education, academic support, and financial assistance.
- One bank employee provided 144 hours as a board member for an agency that serves as an advocate for small businesses in the AA. The mission is to promote philosophies, policies, programs, and projects that enhance opportunities for business growth and prosperity.

#### FDIC Money Smart

The bank leverages the FDIC Money Smart financial education program to help individuals of all ages enhance their financial skills and build positive banking relationships. The program offers basic financial education to students from kindergarten through 12<sup>th</sup> grade and provides tailored training for adults at various life stages and financial situations. It effectively serves diverse groups, including newcomers to the country, adults with disabilities, career changers, and those experiencing significant life events such as starting families or buying or renting their first homes. NBT employees offer the program in multiple languages including Spanish and Russian.

During the evaluation period, 28 bank employees provided 375 hours of service to small business and LMI individuals through the FDIC Money Smart financial education program. This program fosters financial stability for LMI individuals. Small business owners can attend sessions that provide practical introduction to topics related to starting and managing a business.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, consumer loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Illinois		
Chicago-Naperville-Elgin, IL-IN MSA	Full Scope	

## Appendix B: Summary of MMSA and State Ratings

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RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Northbrook Bank & Trust	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 12 CFR 1003.2 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

**Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

**Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.

**Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

**Table 11. 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 AA.

**Table 12. 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 \$500,000) 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 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

**Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Chicago MSA 2024	125	76,354	100.00	37,571	0.96	0.80	0.61	8.51	8.80	8.80	29.72	13.60	27.32	60.81	76.80	63.27	0	0	0
<b>Total</b>	<b>125</b>	<b>76,354</b>	<b>100.00</b>	<b>37,571</b>	<b>0.96</b>	<b>0.80</b>	<b>0.61</b>	<b>8.51</b>	<b>8.80</b>	<b>8.80</b>	<b>29.72</b>	<b>13.60</b>	<b>27.32</b>	<b>60.81</b>	<b>76.80</b>	<b>63.27</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, -- HMDA Aggregate Data, "-- data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Chicago MSA 2024	125	76,354	100.00	37,571	15.94	8.00	6.45	14.12	14.40	15.38	17.24	5.60	18.39	52.69	62.40	45.91	0	9.60	13.88
<b>Total</b>	<b>125</b>	<b>76,354</b>	<b>100.00</b>	<b>37,571</b>	<b>15.94</b>	<b>8.00</b>	<b>6.45</b>	<b>14.12</b>	<b>14.40</b>	<b>15.38</b>	<b>17.24</b>	<b>5.60</b>	<b>18.39</b>	<b>52.69</b>	<b>62.40</b>	<b>45.91</b>	<b>0</b>	<b>9.60</b>	<b>13.88</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, -- HMDA Aggregate Data, "-- data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Chicago MSA 2024	1,271	114,108	100.00	74,404	1.61	3.46	1.96	9.99	12.20	10.59	30.46	23.52	32.22	57.94	60.82	55.23	0	0	0
<b>Total</b>	<b>1,271</b>	<b>114,108</b>	<b>100.00</b>	<b>74,404</b>	<b>1.61</b>	<b>3.46</b>	<b>1.96</b>	<b>9.99</b>	<b>12.20</b>	<b>10.59</b>	<b>30.46</b>	<b>23.52</b>	<b>32.22</b>	<b>57.94</b>	<b>60.82</b>	<b>55.23</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn &amp; Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "-- data not available.

Due to rounding, totals may not equal 100.0%

**Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM		Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago MSA 2024	1,271	114,108	100.00	74,404	79.11	55.15	54.91	12.20	26.51	8.68	18.33
<b>Total</b>	<b>1,271</b>	<b>114,108</b>	<b>100.00</b>	<b>74,404</b>	<b>79.11</b>	<b>55.15</b>	<b>54.91</b>	<b>12.20</b>	<b>26.51</b>	<b>8.68</b>	<b>18.33</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn &amp; Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "-- data not available.

Due to rounding, totals may not equal 100.0%

**Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography**

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 2024	47	4,527	100.00	1.01	2.13	12.18	17.02	31.78	17.02	55.04	63.83	0	0
<b>Total</b>	<b>47</b>	<b>4,527</b>	<b>100.00</b>	<b>1.01</b>	<b>2.13</b>	<b>12.18</b>	<b>17.02</b>	<b>31.78</b>	<b>17.02</b>	<b>55.04</b>	<b>63.83</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

**Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MSA 2024	47	4,527	100.00	20.12	36.17	13.19	14.89	15.58	12.77	51.12	36.17	0	0
<b>Total</b>	<b>47</b>	<b>4,527</b>	<b>100.00</b>	<b>20.12</b>	<b>36.17</b>	<b>13.19</b>	<b>14.89</b>	<b>15.58</b>	<b>12.77</b>	<b>51.12</b>	<b>36.17</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "-- data not available.

Due to rounding, totals may not equal 100.0%