



## **PUBLIC DISCLOSURE**

September 8, 2025

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

Wintrust Bank, National Association  
Charter Number: 25196

231 South LaSalle Street  
Chicago, Illinois 60604

Office of the Comptroller of the Currency

Regional and Midsize Financial Institutions  
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 Wintrust Bank, National Association (WB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Wintrust Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in the State of Illinois, which had a good geographical and an adequate borrower distribution of loans. The bank's lending levels reflect excellent responsiveness to assessment area (AA) credit needs. The bank was a leader in making community development (CD) loans which had a significantly positive impact on the Lending Test conclusion. The bank made extensive use of innovative and flexible products to serve the credit needs of its AA.
- The Investment Test rating is based on the performance in the State of Illinois and reflects an excellent responsiveness to credit and community economic development needs through the origination of qualified investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.
- The Service Test rating is based on the performance in the State of Illinois and reflects service delivery systems that are readily accessible to geographies and individuals of different income levels. The bank is a leader in providing CD services.

### Nationwide Qualified Investments

During the current evaluation period, the bank invested in two certificates of deposit, each valued at \$225,000, with a CD financial institution and a certified minority depository institution. These institutions provide banking services to the business community in the San Gabriel Valley and Los Angeles region, supporting economic development initiatives. Additionally, the bank made two donations totaling \$11,000 to a nonprofit organization in Massachusetts that fosters equitable access to youth sports by partnering with organizations in high-need communities serving youth aged 3 to 18 from low- and/or moderate-income (LMI) families.

## Lending in Assessment Area

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

The bank originated and purchased 9.5 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	699	74.1	244	25.9	943	640,441	52.1	587,946	47.9	1,228,387
Small Business	4,137	7.7	49,263	92.3	53,400	499,666	18.2	2,249,794	81.8	2,749,460
Consumer	370	78.7	100	21.3	470	10,069	39.5	15,429	60.5	25,498
<b>Total</b>	<b>5,206</b>	<b>9.5</b>	<b>49,607</b>	<b>90.5</b>	<b>54,813</b>	<b>1,150,176</b>	<b>28.7</b>	<b>2,853,169</b>	<b>71.3</b>	<b>4,003,345</b>

Source: 1/1/2022 - 12/31/2024 Bank Data.  
 "--" data not available.  
 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.

## Description of Institution

WB is a \$9.4 billion intrastate bank headquartered in Chicago, Illinois. WB is a wholly-owned subsidiary of Wintrust Financial Corporation (WFC). 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, western Michigan, and northwest Indiana by way of their 16 wholly-owned banking subsidiaries and more than 200 bank locations.

WFC locations provide a wide range of lending products and services to their customers. WFC residential mortgage applications are referred to WM. WM, a division of Barrington Bank and Trust Company 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 16 WFC bank subsidiaries for their portfolio.

WFC also provides niche lending products across the nation within their community banks. These specialty products include wealth management advisory services, leasing financing, insurance premium financing, administrative services outsourcing, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2024, WB reported total loans of \$7.9 billion, representing 83.5 percent of total assets. Total loans consisted primarily of \$3.2 billion in commercial & industrial loans (40.6 percent of total loans), \$1.6 billion in non-farm/non-residential loans, and \$830 million in one-to-four family residential loans. Tier 1 capital totaled \$1.1 billion.

WB operates 34 full-service locations as well as two drive-up locations and 47 deposit-taking automated teller machines (ATMs). During the evaluation period, the bank opened one new branch located in a moderate-income census tract (CT) in the east Rogers Park neighborhood of Chicago. The bank closed one branch in April 2022, located in an upper-income CT at 70 West Madison Street, Chicago, Illinois because of the close proximity to the branch located at 231 S. LaSalle.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. There were no acquisitions or mergers during the evaluation period that would have affected the bank's CRA performance or the Office of the Comptroller of the Currency's (OCC) analysis. WB's CRA performance was rated Outstanding in the last Public Evaluation, performed by the OCC dated June 27, 2022.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period was January 1, 2022, through December 31, 2024. This performance evaluation assessed the bank's performance for all products and services, under the Large Bank CRA procedures for Lending, Investment, and Service Tests for the entirety of the evaluation period.

#### Lending Test

In evaluating lending performance, the OCC analyzed home mortgage loans that management reported under Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under CRA. At the bank's request, the OCC considered consumer loan products, which consist of secured and unsecured loans. Banks are not required to report data on consumer loans; therefore, no peer aggregate data was available to compare against consumer lending. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. The OCC did not consider small loans to farms, as the bank did not originate any small loans to farms throughout the evaluation period.

For the Lending Test, two analysis periods were considered to evaluate the geographical and borrower distribution of loans. This split was due to the Office of Management and Budget's revised delineations of metropolitan statistical areas (MSAs), Micropolitan Statistical Areas, and combined statistical areas (CSAs) as of July 21, 2023. The analysis periods for geographical and borrower distribution of loans were January 1, 2022, to December 31, 2023, and January 1, 2024, to December 31, 2024.

#### 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) census tracts 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 MSA, multistate metropolitan statistical area (MMSA), or 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-scope AAs. There are no limited-scope AAs.

### **Ratings**

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

Under the Lending Test, the OCC considered both the number and dollar volume of loans to determine the weighting of loan products. Small loans to businesses made up 79.5 percent of the total number of loans, compared to 13.4 percent for home mortgages and 7.1 percent for consumer loans. However, in terms of dollar volume, home mortgages constituted 55.7 percent of the total loan amount, while small loans to businesses accounted for 43.4 percent, and consumer loans made up 0.9 percent. As a result, the OCC gave equal weight to home mortgages and small loans to businesses, and consumer loans were given less weight.

When determining our conclusions for the geographical and borrower distribution of loans, the OCC gave more weight to the analysis period from January 1, 2022, to December 31, 2023. This period accounted for 66.7 percent of originations and purchases, and 62.3 percent of the loan volume for all home mortgages, small loans to businesses, and consumer loans made within the bank's AA throughout the evaluation period.

Generally, equal emphasis was given to the geographic distribution and borrower distribution of loans by income level. Greater weight is generally given to the bank's performance compared to aggregate lenders than to performance relative to demographic factors in lending, unless other performance context factors indicate greater consideration should be given to demographics. 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 was a better indicator of the number of businesses and individuals served.

At the time of the analysis, small business peer data for 2024 was not available. Therefore, the OCC compared the bank's 2024 performance in small loans to businesses with the 2022-2023 peer data.

## **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 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 this institution's lending performance has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Illinois

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

The major factors that support this rating include:

- Lending activity reflected excellent responsiveness to credit needs in its AA.
- The bank exhibited a good geographic and an adequate borrower distribution of loans in its AA.
- The bank was a leader in making CD loans. The institution made extensive use of innovative and/or flexible lending practices to serve credit needs.
- The bank maintains an excellent level of qualified investments, including grants, often in a leadership position in investments not routinely provided by private investors.
- The bank's service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.
- The bank was a leader in providing CD services.

### Description of Institution's Operations in the State of Illinois

WB has one AA in Illinois, which consists of a partial county within the Chicago-Naperville-Elgin, IL-IN MSA (Chicago MSA). For purposes of this evaluation, the Chicago MSA consists of the partial county of Cook in Illinois. The bank has delineated the AA with 602 out of 1,332 CTs in Cook County.

The branches are in the cities of Chicago, Evanston, Glencoe, Norridge, Skokie, Wilmette, and Winnetka. The Chicago branches are located in several of the city's neighborhoods including Downtown, Fulton Market, Little Village, Logan Square, Mayfair, Montclare, North Center, North Lawndale, Old Town, Pilsen, Ravenswood, River North, Rogers Park, Roscoe Village, Sauganash, Streeterville, Uptown, and Wrigleyville.

The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies. According to the 2020 U.S. Census data, the AA's 602 CTs includes 78 low-and 127 moderate-income CTs.

## Chicago MSA

Assessment Area - Chicago MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	602	13.0	21.1	24.2	39.7	1.3
Population by Geography	2,346,872	11.3	21.7	26.8	39.7	0.7
Housing Units by Geography	1,026,173	10.0	19.8	25.7	43.7	0.7
Owner-Occupied Housing by Geography	468,578	6.2	16.4	29.1	47.8	0.5
Occupied Rental Units by Geography	462,574	13.1	23.2	23.2	39.5	1.0
Vacant Units by Geography	95,021	14.3	19.6	21.2	44.1	0.8
Businesses by Geography	115,809	5.5	13.5	20.8	59.4	0.8
Farms by Geography	1,275	4.9	14.0	23.8	56.6	0.6
Family Distribution by Income Level	500,595	25.2	14.9	16.2	43.8	0.0
Household Distribution by Income Level	931,152	26.2	14.3	15.7	43.8	0.0
Unemployment rate (%)	5.28	12.4	6.5	4.9	3.4	9.1
Households Below Poverty Level (%)	12.52	28.7	16.2	11.1	7.9	27.0
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		\$92,622		Median Housing Value		\$329,850
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2023		\$109,800		Median Gross Rent		\$1,219
				Families Below Poverty Level		9.2
FFIEC File - 2020 Census 2023 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						

### Community Contact

As part of the CRA evaluation, the OCC reviewed information from three community contacts performed during the evaluation period. The community contacts included nonprofit organizations focusing on affordable housing, economic development, and community services.

Contacts expressed a wide range of needs throughout the Chicago MSA including:

- Financing low-income entrepreneurs throughout the Chicagoland area.
- Improving availability of affordable housing, as it has been a critical issue.
- Subsidized mortgage lending products that are sustainably funded.
- Utilize flexible credit criteria for affordable loans to LMI borrowers yet remain safe and sound for lenders.
- Increase workforce of bilingual marketing and loan officers that can proactively reach out into the low-income community.
- Increase in community bank presence located in LMI neighborhoods.
- Small business lending.

### Housing

The housing market in the AA remains constrained, as demand continues to exceed supply, and housing prices trend upwards. The shortage of affordable housing limits both homeownership and rental options for LMI families in the AA. As a high-cost housing area, the AA presents significant barriers to affordable homeownership for LMI borrowers.

Based on information from the 2020 U.S. Census (covering 2022-2023 analysis period), 45.7 percent of the total housing units in the AA were owner-occupied, 45.1 percent were renter occupied, and 9.2 percent were vacant units. Of all owner-occupied units, 6.2 percent were located in low-income CTs, and 16.4 percent were located in moderate-income CTs. Of all occupied rental units, 13.1 percent were located in low-income CTs, and 23.2 percent were located in moderate-income CTs. Of all vacant units, 14.3 percent were located in low-income CTs, and 19.6 percent were located in moderate-income CTs. The median housing value was \$329,850 and the median gross rent was \$1,219.

According to the 2024 U.S. Census data (covering 2024 analysis period), the statistics for the Chicago MSA have remained unchanged.

### Affordability

Based on data from 2020 U.S. Census, low-income families within the Chicago MSA earned less than \$3,859 monthly and moderate-income families earned less than \$6,174 monthly. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,158 for low-income borrowers and \$1,852 for moderate-income borrowers. Assuming a 30-year mortgage with a 6 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, the monthly mortgage payment for a home at the Chicago MSA median housing value would be \$1,978. LMI borrowers would face significant challenges in affording a mortgage loan in this AA.

Based on data from 2024 U.S. Census, low-income families earned less than \$4,575 and moderate-income families earned less than \$7,320 monthly. At a 30 percent debt-to-income ratio, this calculated to a maximum monthly mortgage payment of \$1,373 for low-income borrowers and \$2,196 for moderate-income borrowers. With a monthly mortgage payment of \$1,978 for a home at the Chicago MSA median value, low-income borrowers would face significant challenges in affording a mortgage loan in this AA.

### Employment and Economic Factors

According to the Bureau of Labor Statistics, the annual unemployment rate for the Chicago-Naperville-Schaumburg MSA in 2024 was 5.1 percent, marking its highest level since 2022, when it was 4.6 percent, and 4.4 percent in 2023. The unemployment rate in the MSA was slightly higher than the 2024 statewide rate for Illinois, which stands at 5.0 percent.

Based on information from the November 2024 Moody's Analytics Report, the economy of Chicago-Naperville-Arlington Heights is trailing behind its large peers and the U.S. overall, with payroll employment remaining flat and financial and professional services struggling. Healthcare is the primary job creator, but its growth is stabilizing, and the labor market shows signs of easing as the unemployment rate rises. The region's white-collar sectors, including finance and tech, need strengthening to drive economic progress, with potential boosts from Federal Reserve interest rate cuts and developments in quantum computing. Logistics is expected to grow steadily, benefiting from Chicago's status as an air and rail hub and rebounding air cargo volumes at O'Hare International Airport.

Strengths of the area include major center for business, distribution, transportation and finance, a huge talent pool, strong roster of well-regarded educational institutions, and emerging high-tech center in the River North neighborhood. Weaknesses in the area include state and local budget pressures and weak population trends characterized by net out-migration and an overall population decline. Top five employers in the area are Amazon.com Inc., Advocate Health Care System, Northwestern Memorial Healthcare, University of Chicago, and Walgreens Boots Alliance Inc.

## **Scope of Evaluation in the State of Illinois**

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

The OCC gave equal weight to home mortgages and small loans to businesses. Consumer loans received less weight due to the volume.

For the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank's performance in moderate-income geographies due to the higher percentages of owner-occupied housing units and small businesses.

For the borrower distribution analysis of home mortgage loans, consideration was given to the impact that income and housing costs have on limiting homeownership opportunities of LMI individuals and families. Additionally, consideration was given to the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. It was difficult for many LMI borrowers to afford a home as the area's median housing value was typically too high for conventional mortgage loan qualification. 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.

For the borrower distribution of loans to small businesses, the OCC considered the competitive market condition in the AA. Large interstate banks, regional banks, and community banks competed for this business in the AA. The large number of competing banks and dominance from the top five lenders nominally affect the bank's ability to make small loans to businesses. A meaningful 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 purchased from FIRST, for which revenue data was not provided, or they were originated under a loan product where business revenue is not considered in the underwriting process. The OCC considered the bank's prominent nationwide niche lending programs when evaluating its performance in lending within its AA compared to outside AA lending. More emphasis was placed on the bank's lending relative to aggregate performance.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS**

### **LENDING TEST**

The bank's performance under the Lending Test in 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 was excellent.

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity								2022-2024	
<b>Number of Loans</b>									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Chicago MSA	699	4,137	0	150	370	5,356	99.9	100.0	
Broader Statewide or Regional Area	0	0	0	27	0	27	0.1	0	
<b>Total</b>	<b>699</b>	<b>4,137</b>	<b>0</b>	<b>177</b>	<b>370</b>	<b>5,383</b>	<b>0.1</b>	<b>100.0</b>	
<b>Dollar Volume of Loans (\$000s)</b>									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Chicago MSA	640,441	499,666	0	182,903	10,069	1,333,079	94.9	100.0	
Broader Statewide or Regional Area	0	0	0	71,016	0	71,016	5.1	0	
<b>Total</b>	<b>640,441</b>	<b>499,666</b>	<b>0</b>	<b>253,919</b>	<b>10,069</b>	<b>1,404,095</b>	<b>100.0</b>	<b>100.0</b>	
<i>Source: 1/1/2022 – 12/31/2024 Bank Data</i>									
<i>Due to rounding, totals may not equal 100.0%</i>									

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

According to the FDIC's June 30, 2024, Deposit Market Share report, WB had \$8.3 billion in deposits with a deposit market share of 1.9 percent. The bank's deposit market share ranked 10<sup>th</sup> out of 99 deposit taking institutions. The top five institutions by deposit market share were BMO Bank N.A., JP Morgan Chase Bank, N.A., Bank of America, N.A., CIBC Bank USA, and The Northern Trust Company. These five institutions had a combined deposit market share of 67.8 percent.

According to 2024 peer mortgage data, WB had a 0.7 percent market share of home mortgage originations. WB's market share of home mortgage originations was weaker than its deposit market share. WB's mortgage originations ranked 31<sup>st</sup> out of 603 home mortgage lenders. The bank's market share ranking of home mortgage loan originations, relative to all home mortgage lenders, was in the top 6.0 percent. WB's market share ranking of home mortgage loan originations was stronger than its deposit market share. The top five home mortgage lenders by number of loans and market share were Guaranteed Rate, Inc., JP Morgan Chase Bank, N.A., United Wholesale Mortgage, CrossCountry Mortgage, LLC, and Huntington National Bank. These five lenders had a combined home mortgage loan market share of 27.1 percent.

According to 2023 peer small business data, WB had a 1.0 percent market share of small business loan originations. WB's market share of small business loan originations weaker than its deposit market share. WB's market share of small business loan originations ranked 11<sup>th</sup> out of 219 small business loan lenders. The bank's market share ranking of small business loan originations relative to all small business loan lenders was in the top 6.0 percent. The bank's market share ranking of small business loan originations was stronger than its deposit market share ranking. The top five small business lenders by number of loans and market share were JP Morgan Chase Bank, N.A., American Express National Bank, Bank of America, N.A., Citi Bank, N.A., and Capital One, N.A. These five lenders are all larger national banks with sizeable business credit card portfolios and had a combined small business loan market share of 74.4 percent.

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

The bank exhibited a good 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.

The geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to borrowers in low-income geographies was below the percentage of owner-occupied homes in those geographies but was near to the aggregate distribution of loans. The percentage of home mortgage loans to borrowers in moderate-income geographies was near to the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans.

For 2024, the bank's performance was weaker than the 2022 through 2023 performance. Weaker performance was due to a lower percentage of loans in moderate-income geographies. The percentage of loans in low-income geographies exceeded both the percentages of owner-occupied homes and the aggregate distribution of loans. The percentage of home mortgage loans to borrowers in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

### ***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.

The geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies but was below the aggregate distribution of loans.

For 2024, the bank's performance was stronger than the 2022 through 2023 performance. Stronger performance was due to a higher percentage of loans in both LMI geographies. The percentage of small loans to businesses in LMI geographies exceeded the percentage of businesses 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.

The geographic distribution of the bank's consumer loans is excellent.

For 2022 through 2023, the bank's percentage of consumer loans in both LMI geographies exceeded the percentage of the population in those geographies.

For 2024, the bank's performance was consistent with the 2022 through 2023 performance. The bank's percentage of consumer loans in both LMI geographies exceeded the percentage of the population in those geographies.

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

Examiners did not identify any unexplained conspicuous gaps in any of the areas they reviewed. The OCC reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AA.

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

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses 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.

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

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate distribution of loans.

For 2024, the bank's performance was consistent with the 2022 through 2023 performance. The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate distribution of loans.

#### ***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.

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

For 2022 through 2023, the bank did not collect or consider the gross annual revenues in the underwriting of 17.9 percent of its small loans to businesses. For 2024, the bank did not collect or consider the gross annual revenues in the underwriting of 15.8 percent of its small loans to businesses.

Based on those businesses with known revenues, for 2022 through 2023, the bank's percentage of small loans to businesses was well below the percentage of businesses with gross annual revenues of \$1 million or less but was near to the aggregate distribution of small loans to businesses.

For 2024, the bank's performance was stronger than the 2022 through 2023 performance. Stronger performance was due to a higher percentage compared to the aggregate distribution of small loans to businesses. The bank's percentage of small loans to businesses was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to 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.

The borrower distribution of consumer loans is excellent.

For 2022 through 2023, the bank's percentage of consumer loans to both LMI borrowers exceeded the percentage of those households.

For 2024, the bank's performance was consistent with the 2022 through 2023 performance. The bank's percentage of consumer loans to both LMI borrowers exceeded the percentage of those households.

### **Community Development Lending**

The institution was a leader in making CD loans. The level of CD lending had a significantly positive impact on the lending test conclusion for the Chicago MSA.

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.

The level of CD lending was excellent. During the evaluation period, WB originated 150 loans totaling \$182.9 million or 16.6 percent of tier 1 capital. The bank's CD loans were responsive to community services, affordable housing, economic development, as well as revitalization and stabilization. By dollar volume, \$96.4 million (52.7 percent) funded community services targeted to LMI individuals, \$38.1 million (20.8 percent) funded economic development activities, \$26.0 million (14.2 percent) funded affordable housing, and \$22.4 million (12.2 percent) funded revitalization and stabilization efforts in LMI geographies.

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

- The bank originated a \$2.1 million commercial mortgage on a mixed-use property located in a low-income area. The property consists of 22 apartments and commercial space. The commercial space is 100 percent leased to an organization providing community services and shelter to

women and children of need. The apartment units are also utilized by the organization to provide housing for homeless children and their families.

- The bank extended two revolving lines of credit totaling \$7.5 million for working capital to support community services provided to LMI students with educational and economic needs. The organization provides advocacy and long-term resources to help students succeed in college preparatory schools, college, and as family, business, and community leaders.
- The bank provided a \$175,000 revolving working capital line of credit to a non-profit organization that provides career training, business start-up development training, tech start-up training, and access to a business accelerator to low-income individuals and families located in a low-income region of Chicago.

### Broader Statewide Regional CD lending

Because WB 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 statewide area consisted of 27 loans totaling \$71.0 million. These loans primarily supported revitalization and stabilization efforts, and economic development targeted to LMI areas. By dollar volume, \$49.2 million (69.3 percent) funded revitalization and stabilization efforts, \$11.3 million (15.9 percent) funded economic development activities, \$7.6 million (10.7 percent) funded community services, and \$2.9 million (4.1 percent) funded affordable housing. This CD loan 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. A summary of the bank's innovative and/or flexible loan products or programs are as follows:

Money Smart Everyday Loan was offered as an alternative to payday loans. These loans provided unsecured financing from \$500 to \$2,500 with lower interest rates and up to 24-month repayment terms. During the evaluation period, the bank originated/renewed 176 Money Smart Everyday loans in the AA totaling \$454,625.

Money Smart Certificate of Deposit Secured Loan was offered to assist persons with derogatory credit or no credit history who are unable to qualify for traditional bank products. The loan proceeds were used to open a certificate of deposit which is then used to secure the loan. After payoff, customers receive use of the money from the certificate of deposit and benefit from positive reporting of credit history. Features of the loan include low loan amounts, no loan fees, low fixed rates, no required credit history, no required length of residency, and no required proof of income. During the evaluation period, the bank originated/renewed 95 Money Smart Certificate of Deposit loans in the AA totaling \$77,120.

Small Business Easy Access Line of Credit (LOC) was built specifically for businesses less than a year old and was designed to offer micro businesses short-term cash to support inventory growth and accounts receivable. The loan can be secured or unsecured to accommodate small businesses in a variety

of stages and circumstances. The LOC was a flexible financing solution up to \$10,000 at a variable rate lower than most credit cards, with additional tiers allowing loan amounts up to \$250,000. During the evaluation period, the bank originated/renewed 1,089 Easy Access LOC loans in the AA totaling \$87.1 million.

Small Business Easy Access Installment Loan was designed to offer micro businesses financing for acquisition of fixed assets or debt refinancing. The product includes tiers with loan amounts up to \$250,000. There are also tiers available for unsecured loans in addition to loans secured by business assets. During the evaluation period, the bank originated/renewed 28 Easy Access Installment loans in the AA totaling \$1.8 million.

WB offered Small Business Overdraft Protection (ODP); a product designed to offer micro businesses a safety net for periods of short-term cash flow constraint. The products assist the businesses in limiting overdraft fees or returned check charges that may be imposed by a vendor or other party. There is no application, closing or annual fees for this product. The maximum commitment varies between \$5,000 to \$10,000. During the evaluation period, the bank originated 369 ODP lines in the AA totaling \$1.5 million.

The bank participated in SBA programs including the 504-loan program, 7a loan program, and the Express program. During the evaluation period, a total of 57 loans totaling \$36 million were originated in the AA under these programs.

Wintrust Community Bank Down Payment Program was a down payment and closing cost assistance program for LMI homebuyers funded jointly by the community bank charters under Wintrust Financial Corporation. The program helped LMI homebuyers achieve their dream of homeownership. The assistance was provided in \$2,000 grants paid on behalf of the borrower at the time of closing on first mortgage financing for the home purchase and is fully forgiven at closing. Borrowers must have annual household income at or below 80 percent of HUD median income where the property was located. During the evaluation period the bank provided \$26,667 in grants and paid \$6,667 in combined administrative fees to the partner HUD approved counseling agencies.

The bank refers requests for purchases and refinances of residential mortgages to its affiliate WM. WM offers a wide array of innovative products. These products include a CRA Portfolio Product that is favorable to LMI applicants and features higher loan to value and lower credit score standards than traditional portfolio products. Aside from the CRA Portfolio Product, WM has various loan programs and products that are not reported by WB; however, they do increase accessibility for their customers to innovative programs. These programs and products include the Illinois Housing Development Authority (IHDA) loan programs, the Fannie Mae HomeReady Mortgage Program, the Fannie Mae HomeReady First Special Purpose Credit Program, the Freddie Mac Home Possible Mortgage Program, the Freddie Mac BorrowSmart Special Purpose Credit Program, the No Customer Left Behind Program, the Federal Home Loan Bank of Chicago down payment programs, FHA loans, and VA loans.

## **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 was excellent.

The institution had an excellent level of qualified investments, including grants, often 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.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago MSA	30	41,488	733	87,370	763	94.5	128,858	88.9	3	3,645
Regional	8	8,037	36	8,118	44	5.5	16,155	11.1	10	5,469
<b>Total</b>	<b>38</b>	<b>49,525</b>	<b>769</b>	<b>95,488</b>	<b>807</b>	<b>100.0</b>	<b>145,013</b>	<b>100.0</b>	<b>13</b>	<b>9,114</b>

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

The dollar volume of current- and prior-period investments represented 13.2 percent of tier 1 capital. This did not include three unfunded commitments totaling \$3.6 million representing an additional 0.3 percent of tier 1 capital. WB had 763 qualified investments and grants in the AA totaling \$128.9 million. Of these qualified investments and grants, \$62.6 million (48.6 percent) supported economic development activities, \$59.1 million (45.8 percent) supported affordable housing, \$7.0 million (5.5 percent) supported community services targeted to LMI individuals, and \$100,400 (0.1 percent) supported revitalization and stabilization efforts in LMI geographies.

The following are examples of qualified investments in the AA:

- The bank invested \$23.6 million in a community investment fund. The underlying investments allocated to the bank include 73 affordable single-family home loans provided to LMI borrowers, with the average borrower income representing 66 percent of the area median income.
- The bank invested a total of \$21.5 million in three low-income housing tax credit funds/projects. These investments will help create 450 affordable housing units for LMI seniors and families across various neighborhoods within the assessment area.
- The bank invested \$2 million in a CD loan fund that supports the creation of stable and healthy communities through the development and financing of affordable housing. The proceeds will be used to rehabilitate an existing multifamily property and construct a new affordable housing development. Both properties will provide affordable housing to LMI individuals within the bank’s AA.

Examples of qualified grants in this AA include:

- The bank provided four grants totaling \$135,000 to a non-profit community service organization that funds post-secondary scholarships and non-tuition costs for Chicago Public School (CPS) graduates and adult family members attending post-secondary school. Seventy percent of CPS students are considered economically disadvantaged. The scholarships remove financial barriers

for CPS students and families, covering tuition, room and board, books and fees, plus an annual stipend. Recipients of scholarships also receive advising and mentoring support to help them achieve their desired degree or certification.

- The bank provided six grants totaling \$117,500 to a nonprofit community service organization that provides programs for domestic violence situations, including financial literacy education. The grants fund the organization's basic money management program which is designed to strengthen the money management skills of LMI women by providing tools to help with budgeting and credit issues, enabling an understanding of financial security, and providing access to financial opportunities and resources. The majority of their services are targeted to LMI individuals.
- The bank provided three grants totaling \$45,907 to support a down payment and closing cost assistance program aimed at LMI homebuyers. This program provides funds through various HUD-approved nonprofit agencies in the Chicagoland area. The assistance is offered as a grant, paid on behalf of the borrower at the time of closing, and is fully forgiven at closing.
- The bank provided five grants totaling \$16,000 to an organization serving the AA to preserve affordable housing, prevent displacement, and provide small-business development assistance. The organization offers free technical assistance and support services to small businesses, advising and resources to renters and landlords, and advocates for the best interest of the community.

#### Broader Statewide Regional Qualified Investments

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered investments 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.

These investments amounted to 16.2 million in total. During the current evaluation period, \$8.1 million was invested in small business investment corporation (SBIC) funds that promote economic development, as well as in a minority depository institution and a CD financial institution that provide loans for affordable housing. Additionally, grants were given to organizations offering community services to LMI individuals and families. Prior period investments totaled \$8 million and also included contributions to SBIC funds supporting economic development. Collectively, these investments and grants had a neutral impact and supported the Investment Test conclusion.

### **SERVICE TEST**

The bank's performance under the Service 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 was excellent.

## Retail Banking Services

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

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 MSA	100.0	36	100.0	8.3	11.1	19.4	61.1	0	11.3	21.7	26.8	39.7	0.7
<b>Total</b>	100.0	36	100.0	8.3	11.1	19.4	61.1	0	11.3	21.7	26.8	39.7	0.7

Source: FFIEC File - 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’s distribution of branches in low-income geographies was below the percentage of the population and in moderate-income geographies was well below the percentage of the population living within those geographies. The bank had 36 branches in the AA, with three branches in low-income CTs and four in moderate income CTs. Examiners further considered five MUI branches that enhanced access for LMI individuals or geographies within the AA. Specifically, examiners noted two middle-income branches within 1,000 feet of low-income CT and another middle-income branch within 1,000 feet of two moderate-income CTs. Additionally, examiners reviewed the data on accounts held at those MUI branches further than 1,000 feet from LMI CTs and determined that one upper-income branch and one middle-income branch were serving the nearby LMI individuals or geographies. These five MUI branches had a positive impact on the retail banking services conclusion.

WB provided alternative delivery systems (ADS) in addition to traditional service delivery methods. These included deposit-taking ATMs, online and mobile banking, Zelle, and electronic bill pay. Based on the bank provided data, 71.9 percent of the deposit accounts opened by WB in LMI CTs utilized online or mobile banking during the evaluation period. The bank also offered flexible deposit products and retail services, including Money Smart Checking and Savings accounts. The bank operated four deposit-taking ATM in low-income CTs and seven in moderate-income CTs within the AA. These ADS had a neutral impact and supported the retail banking services conclusion

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

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 improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch in the moderate-income CT in December 2024. Additionally, the bank closed one branch in an upper-income CT area due to its proximity to other branches.

Services, including where appropriate, business hours, did not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. All branches are open

Monday through Friday from 9:00 AM to 5:00 PM, and on Saturdays from 9:00 AM to 1:00 PM, except for one upper-income branch that is closed on Saturdays.

## **Community Development Services**

The institution was a leader in providing CD services.

WB employees held leadership positions as board or committee members for 108 CD organizations in the AA, accounting for 10,234 hours during the evaluation period. Additionally, employees provided 1,168 hours of volunteer service to 144 community organizations during the evaluation period. The organizations focused on affordable housing, home ownership education, economic development, technical assistance to small businesses, community services, as well as financial education to LMI individuals and food bank distribution support.

- Two employees served a cumulative 576 hours as board members for a nonprofit organization that seeks to facilitate economic development by providing no-cost business development assistance to local and small business owners. They provided services geared specifically toward potential small business owners which include professional development workshops, access to capital, licensing, and workforce development assistance.
- Four employees served 564 hours as board members (especially as part of the Finance Committee) of a multipurpose nonprofit that provides social services to LMI families including Head Start programs, pre-apprenticeship programs, and family shelters. Approximately 81.0 percent of those the nonprofit serves are LMI
- Two employees served a cumulative 192 hours as board members for a nonprofit organization that helps preserve local affordable housing and provide business development assistance to local small businesses. The organization achieves this by providing resources for small business owners to test their business model before scaling the business and seeking to occupy local empty storefronts.

### FDIC Money Smart Program

The bank utilizes the FDIC Money Smart program to educate individuals throughout the community on the benefits of financial literacy. Employees at the bank have two different types of modules at their disposal for two different types of audiences. Small Business modules teach aspiring entrepreneurs and small business owners about practical topics necessary to start and own a small business, including risk management, tax planning and reporting, and financial management. Consumer modules teach LMI individuals in the community about personal financial literacy topics, including how to handle identity theft, budgeting, and investing. During the evaluation period, employees provided 1,254 hours of financial education to the community through the program.

### Cristo Rey Work Study Program

The bank participated in the Cristo Rey St. Martin Corporate Work Study (CWS) program, an innovative national model that integrates professional work experience with a rigorous college preparatory education for students from LMI families. Cristo Rey's mission is to partner with educators,

businesses, and communities to enable students to fulfill their aspirations for a lifetime of success. Through the CWS program, Cristo Rey St. Martin students are employed in entry-level professional roles one full day per week throughout the academic year. The school manages all administrative aspects of employment, including the partnerships with corporate partners (such as WB) which helps fund students' education and allows them to finance most of their tuition costs. Participation in the CWS program offers students valuable professional experience, helps build self-confidence, and reinforces the relevance of their education. One bank employee provided 580 hours of community service through board and committee leadership during the evaluation period.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	1/1/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and 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>
<b>State of Illinois</b>		
Chicago MSA	Full-scope	Partial Cook County

## Appendix B: Summary of State Ratings

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RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Wintrust Bank National Association	Outstanding	Outstanding	Outstanding	Outstanding
State:				
State of Illinois	Outstanding	Outstanding	Outstanding	Outstanding

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

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 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 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** **2022 - 2023**

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	454	374,258	100.0	89,500	6.2	4.9	5.7	16.4	14.3	14.6	29.1	17.8	25.9	47.8	62.3	53.2	0.5	0.7	0.5
<b>Total</b>	<b>454</b>	<b>374,258</b>	<b>100.0</b>	<b>89,500</b>	<b>6.2</b>	<b>4.9</b>	<b>5.7</b>	<b>16.4</b>	<b>14.3</b>	<b>14.6</b>	<b>29.1</b>	<b>17.8</b>	<b>25.9</b>	<b>47.8</b>	<b>62.3</b>	<b>53.2</b>	<b>0.5</b>	<b>0.7</b>	<b>0.5</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "0" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2024**

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	245	266,183	100.0	37,489	6.2	8.6	6.1	16.4	12.7	15.3	29.1	14.7	26.3	47.8	63.3	52.0	0.5	0.8	0.4
<b>Total</b>	<b>245</b>	<b>266,183</b>	<b>100.0</b>	<b>37,489</b>	<b>6.2</b>	<b>8.6</b>	<b>6.1</b>	<b>16.4</b>	<b>12.7</b>	<b>15.3</b>	<b>29.1</b>	<b>14.7</b>	<b>26.3</b>	<b>47.8</b>	<b>63.3</b>	<b>52.0</b>	<b>0.5</b>	<b>0.8</b>	<b>0.4</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "0" 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** **2022 - 2023**

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	454	374,258	100.0	89,500	25.2	4.0	5.7	14.9	11.0	15.7	16.2	8.2	18.8	43.8	52.9	43.0	0	24.0	16.8
<b>Total</b>	<b>454</b>	<b>374,258</b>	<b>100.0</b>	<b>89,500</b>	<b>25.2</b>	<b>4.0</b>	<b>5.7</b>	<b>14.9</b>	<b>11.0</b>	<b>15.7</b>	<b>16.2</b>	<b>8.2</b>	<b>18.8</b>	<b>43.8</b>	<b>52.9</b>	<b>43.0</b>	<b>0</b>	<b>24.0</b>	<b>16.8</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "0" 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** **2024**

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	245	266,183	100.0	37,489	25.2	2.9	4.0	14.9	11.0	13.3	16.2	6.9	18.1	43.8	55.9	45.2	0	23.3	19.4
<b>Total</b>	<b>245</b>	<b>266,183</b>	<b>100.0</b>	<b>37,489</b>	<b>25.2</b>	<b>2.9</b>	<b>4.0</b>	<b>14.9</b>	<b>11.0</b>	<b>13.3</b>	<b>16.2</b>	<b>6.9</b>	<b>18.1</b>	<b>43.8</b>	<b>55.9</b>	<b>45.2</b>	<b>0</b>	<b>23.3</b>	<b>19.4</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "0" 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																			2022 - 2023		
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	2,798	335,521	100.0	155,428	5.5	8.3	5.2	13.5	12.5	15.5	20.8	18.9	24.6	59.4	59.6	54.0	0.8	0.7	0.7		
<b>Total</b>	<b>2,798</b>	<b>335,521</b>	<b>100.0</b>	<b>155,428</b>	<b>5.5</b>	<b>8.3</b>	<b>5.2</b>	<b>13.5</b>	<b>12.5</b>	<b>15.5</b>	<b>20.8</b>	<b>18.9</b>	<b>24.6</b>	<b>59.4</b>	<b>59.6</b>	<b>54.0</b>	<b>0.8</b>	<b>0.7</b>	<b>0.7</b>		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "0" 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																			2024		
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	1,339	164,145	100.0	0	5.4	7.5	0	13.7	17.2	0	21.1	19.9	0	59.1	54.5	0	0.8	1.0	0		
<b>Total</b>	<b>1,339</b>	<b>164,145</b>	<b>100.0</b>	<b>0</b>	<b>5.4</b>	<b>7.5</b>	<b>0</b>	<b>13.7</b>	<b>17.2</b>	<b>0</b>	<b>21.1</b>	<b>19.9</b>	<b>0</b>	<b>59.1</b>	<b>54.5</b>	<b>0</b>	<b>0.8</b>	<b>1.0</b>	<b>0</b>		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "0" data not available.

Due to rounding, totals may not equal 100.0%

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	2,798	335,521	100.0	155,428	80.4	52.4	55.2	11.8	29.7	7.8	17.9
<b>Total</b>	<b>2,798</b>	<b>335,521</b>	<b>100.0</b>	<b>155,428</b>	<b>80.4</b>	<b>52.4</b>	<b>55.2</b>	<b>11.8</b>	<b>29.7</b>	<b>7.8</b>	<b>17.9</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "0" data not available.  
Due to rounding, totals may not equal 100.0%*

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	1,339	164,145	100.0	0	80.5	55.2	0	11.0	29.0	8.5	15.8
<b>Total</b>	<b>1,339</b>	<b>164,145</b>	<b>100.0</b>	<b>0</b>	<b>80.5</b>	<b>55.2</b>	<b>0</b>	<b>11.0</b>	<b>29.0</b>	<b>8.5</b>	<b>15.8</b>

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "0-" data not available.  
Due to rounding, totals may not equal 100.0%*

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	222	6,852	100.0	9.6	16.7	19.8	24.8	26.2	25.2	43.7	32.4	0.7	0.9
<b>Total</b>	<b>222</b>	<b>6,852</b>	<b>100.0</b>	<b>9.6</b>	<b>16.7</b>	<b>19.8</b>	<b>24.8</b>	<b>26.2</b>	<b>25.2</b>	<b>43.7</b>	<b>32.4</b>	<b>0.7</b>	<b>0.9</b>

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data.  
Due to rounding, totals may not equal 100.0%*

**Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2024**

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	148	3,217	100.0	9.6	22.3	19.8	23.7	26.2	27.0	43.7	25.7	0.7	1.4
<b>Total</b>	<b>148</b>	<b>3,217</b>	<b>100.0</b>	<b>9.6</b>	<b>22.3</b>	<b>19.8</b>	<b>23.7</b>	<b>26.2</b>	<b>27.0</b>	<b>43.7</b>	<b>25.7</b>	<b>0.7</b>	<b>1.4</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 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** **2022 - 2023**

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	222	6,852	100.0	26.2	61.7	14.3	18.0	15.7	7.2	43.8	13.1	0	0
<b>Total</b>	<b>222</b>	<b>6,852</b>	<b>100.0</b>	<b>26.2</b>	<b>61.7</b>	<b>14.3</b>	<b>18.0</b>	<b>15.7</b>	<b>7.2</b>	<b>43.8</b>	<b>13.1</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, "0" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** **2024**

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	148	3,217	100.0	26.2	54.8	14.3	18.2	15.7	8.8	43.8	16.2	0	0
<b>Total</b>	<b>148</b>	<b>3,217</b>	<b>100.0</b>	<b>26.2</b>	<b>54.8</b>	<b>14.3</b>	<b>18.2</b>	<b>15.7</b>	<b>8.8</b>	<b>43.8</b>	<b>16.2</b>	<b>0</b>	<b>0</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, "0" data not available.  
 Due to rounding, totals may not equal 100.0%