PUBLIC DISCLOSURE

March 2, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

State Bank of the Lakes, National Association
Charter Number: 25200

400 Lake Street
Antioch, IL 60002

Office of the Comptroller of the Currency
Regional Midsize Financial Institutions
400 7th Street SW
Washington D.C., 20219

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 (LMI) 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 **State Bank of the Lakes, NA.** with respect to the Lending, Investment, and Service Tests:

Performance Levels	State Bank of the Lakes, NA. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance within the Chicago multistate metropolitan statistical area (MMSA), which had excellent geographical and good borrower distribution of loans. The lending test rating is also based on excellent performance within the states of Illinois and Wisconsin. The bank's lending levels reflect adequate responsiveness in the Chicago MMSA and good responsiveness in the states of Illinois and Wisconsin. The bank was a leader in making community development (CD) loans, which had a significantly positive impact on the Lending Test conclusion. The bank makes extensive use of innovative and flexible products to serve the credit needs of its Assessment Area (AA).

- The Investment Test rating is based on excellent performance within the Chicago MMSA and good performance in Illinois and Wisconsin. Performance reflects excellent responsiveness to credit and community economic development needs through the origination of qualified investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

- The Service Test rating is based on good performance within the Chicago MMSA and the states of Illinois and Wisconsin. Service delivery systems are accessible to geographies and individuals of different income levels. The bank was a leader in providing CD services.

Nationwide Qualified Investments

At the national level, the bank made two qualified investments totaling $450,000 during the evaluation period. These investments consisted of one certificate of deposit (CD) placed with a Minority Depository Institution (MDI) and one CD placed with a Certified Community Development Financial Institution (CDFI). State Bank of the Lakes focuses on promoting financial inclusion and expanding access to capital in underserved and economically distressed communities nationwide.

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

Lending in Assessment Area

A very small percentage of the bank's loans were in its AAs.

The bank originated and/or purchased 3.8 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.

Nationwide lending programs are used by the bank which impact the ratio of loans located inside the bank's AAs. The bank purchases loans from an affiliate, First Insurance Funding (FIRST). FIRST loans are originated by Lake Forest Bank & Trust, N.A, and the majority are sold to other affiliate banks. During the evaluation period, the bank purchased 61,971 loans from FIRST. The primary lending product based on volume of loans by number is small business loans. Conclusions regarding lending inside and outside the AA are factored into the analysis of the distribution of lending by income level of the geography.

Table 1: Lending Inside and Outside of the Assessment Area **2022 - 2025**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	145	42.15	199	57.85	344	49,821	22.93	167,415	77.07	217,236
Small Business	2,261	3.57	61,132	96.43	63,393	191,899	7.47	2,375,913	92.53	2,567,812
Small Farm	3	20.00	12	80.00	15	170	24.85	514	75.15	684
Total	2,409	3.78	61,343	96.22	63,752	241,890	8.68	2,543,842	91.32	2,785,732

Source: 1/1/2022 - 12/31/2025 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

State Bank of the Lakes, N.A. (SBotL or the bank) is a $2.5 billion interstate bank headquartered in Antioch, Illinois. SBotL is a wholly owned subsidiary of Wintrust Financial Corporation (WFC), a financial services holding company headquartered in Rosemont, Illinois. As of December 31, 2025, WFC reported approximately $71.1 billion in total consolidated assets. WFC operates through a community banking model, consisting of 16 wholly-owned banking affiliates, with more than 200 bank branch locations. WFC's market coverage is primarily concentrated in the Chicago metropolitan area, with additional banking and lending operations in southeastern Wisconsin, northwest Indiana, and west-central Michigan.

WFC provides a wide range of banking and financial services to its customers through its community banking unit, primarily to individuals, small to mid-sized businesses, local governmental units, and institutional clients residing primarily in local areas the company serves. WFC's residential mortgage applications are referred to Wintrust Mortgage (WM), operated through Barrington Bank & Trust. WM offers a wide variety of retail mortgage products and originates nearly all WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 16 WFC banks.

WFC provides niche lending products across the nation within their community banks. These specialty products include wealth management advisory services, commercial insurance premium financing through FIRST, lease financing, short-term account receivable financing, administrative services, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2025, SBotL reported total loans of $1.9 billion, representing 76.0 percent of total assets. SBotL is primarily a commercial lender, with total commercial loan exposure of $1 billion or 52.6 percent of total loans split between two main categories: commercial & industrial loans at $699 million or 36.8 percent of total loans and non-farm non-residential loans at $257.3 million or 13.6 percent of total loans. The loan portfolio is also comprised of consumer loans totaling $408.4 million or 21.5 percent of total loans and residential loans totaling $214.4 million or 11.3 percent of total loans. SBotL reported tier 1 capital of $233.3 million.

SBotL operated six full-service branches within the northern portion of Illinois and four full-service branches within the southeastern portion of Wisconsin. The bank opened a temporary branch in the fourth quarter of 2025, at the Kenosha Innovation Center while the permanent branch is under construction. The estimated completion date for the permanent branch is the fourth quarter of 2026. SBotL operates nine automated teller machines (ATM). All the bank's ATMs have deposit-taking capabilities.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. There were no acquisitions or mergers during the evaluation period that would have affected the bank’s CRA performance or the OCC’s analysis. SBotL's CRA performance was rated “Outstanding” in the last performance evaluation, dated May 2, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is January 1, 2022, through December 31, 2025. This performance evaluation assesses the bank's performance for all products and services, under the Large Bank CRA procedures for Lending, Investment, and Service Tests for the entirety of the evaluation period.

For the evaluation period, there are two separate analysis periods due to updates to the Office of Management and Budget's (OMB) revised delineations of Metropolitan Statistical Areas (MSA) as of July 2023. Specifically, the change established Kenosha County, Wisconsin, as a standalone MSA, removing it from the Lake County-Kenosha County, IL-WI Metropolitan Division (MD). The 2022-2023 evaluation period included the entire Chicago-Naperville-Elgin, IL-IN-WI MMSA. The 2024-2025 evaluation period included two rating areas: Illinois and Wisconsin. The Chicago-Naperville-Elgin IL-IN MSA AA is the only assessment area within the bank's state of Illinois rating area. The Kenosha-Walworth Counties AA includes the Kenosha MSA and one single census tract in the southeastern portion of Walworth County, WI that is adjacent to Kenosha County. The analysis period for CD loans, the investment test, and the service test was January 1, 2022, to December 31, 2025.

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. The bank did not submit consumer loan product information for consideration. Banks are not required to report data on consumer loans. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. The OCC did not include small loans to farms in this performance evaluation, as the bank's volume of such loans did not meet the threshold required for analysis. The OCC did not include home mortgage loans for the 2024-2025 evaluation period for the state of Wisconsin, as the volume of loans did not meet the threshold required for analysis. The housing market in the assessment area is challenged, as demand for housing exceeds the supply, and prices continue to trend upwards. Unmitigated increases in home values have made it difficult for low-income families to purchase homes in the assessment area.

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 prior periods were considered at the book value of the investment as of December 31, 2025. Current-period investments were considered at their original investment amount, even if that amount is greater than the current book value of the investment. 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 (CTs) within proximity to 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, 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.

Ratings

The bank's overall rating is a blend of the Chicago MMSA and the Illinois and Wisconsin state ratings.

Under the Lending Test, the OCC considered both the number and dollar volume of loans to determine the weighting of loan products. In terms of the number of loans, small loans to businesses made up 93.8 percent of the total number of loans compared to 6.2 percent for home mortgages. In terms of dollar volume, small loans to businesses constituted 79.3 percent of the total loan amount, while home mortgages accounted for 20.5 percent. As a result, the OCC gave greater weight to small loans to businesses.

Generally, equal emphasis is given to the geographic distribution and borrower distribution of loans by income level. Greater weight was 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 is a better indicator of the number of businesses and individuals served.

Product Innovation and Flexibility

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

Consumer Loan Program

Money Smart Everyday Small Dollar Loan is offered as an alternative to payday loans for LMI individuals. These loans provide unsecured financing from $500 to $5,000 with no fees, lower interest rates, and up to 24-month repayment terms. During the evaluation period, the bank originated/renewed 198 Money Smart Everyday loans totaling $598,859.

Money Smart Certificate of Deposit Secured Loan is offered to assist people with derogatory credit or no credit history who are unable to qualify for traditional bank products. The loan proceeds are 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 22 Money Smart Certificate of Deposit loans totaling $27,500.

Small Business Loan Programs

Small Business Easy Access Line of Credit (LOC) was built specifically for businesses less than a year old and is 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 is 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 441 Easy Access LOC loans totaling $10.4 million.

Small Business Easy Access Installment Loan is 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 26 Easy Access Installment loans totaling $872,835.

SBotL offers 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 from $5,000 to $10,000. During the evaluation period, the bank originated 335 ODP lines totaling $315,558.

The bank participates in SBA programs including the 504-Loan Program, 7(a) Loan Program, and Express Loan Program. During the evaluation period, a total of 31 loans totaling $20.4 million originated under these programs.

Wintrust Community Bank Down Payment Program is a down payment and closing cost assistance program for LMI homebuyers funded jointly by the community bank charters under Wintrust Financial Corporation. The program helps LMI homebuyers achieve their dream of homeownership. The assistance is provided with $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 is located. During the evaluation period the bank provided 382 grants totaling $764,000 in grants and paid $159,600 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 SBotL; 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 Borrow Smart 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.

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's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

Multistate Metropolitan Statistical Area Rating

Chicago-Naperville-Elgin, IL-IN-WI

CRA rating for the Chicago-Naperville-Elgin, IL-IN-WI [1]**:** Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity reflects adequate responsiveness to credit needs in the bank AA.
- The bank exhibits excellent geographic distribution and a good borrower distribution of loans in its AA.
- The bank was a leader in making CD loans. The level of CD-lending had a positive impact on the lending test.
- The bank had an excellent level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The bank exhibits excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.
- Service delivery systems were 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 Chicago-Naperville-Elgin, IL-IN-WI

The bank designated one AA, the Chicago-Naperville-Elgin IL-IN-WI MMSA. The Bank's assessment area also includes a single census tract in Walworth County, WI., within the Wisconsin NON-MSA.

The bank's multistate AA was comprised of 268 contiguous CTs which included 16 low-income CTs, 53 moderate-income CTs, 103 middle-income CTs, 90 upper-income CTs, and six CTs with income not reported. The AA meets regulatory requirements and does not arbitrarily exclude any LMI geographies.

Chicago-Naperville-Elgin IL-IN-WI MMSA

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

[1] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Assessment Area(s) - Chicago-Naperville-Elgin IL-IN-WI MMSA						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	268	5.97	19.78	38.43	33.58	2.24
Population by Geography	1,199,042	5.04	19.19	39.81	34.80	1.16
Housing Units by Geography	456,429	5.10	19.34	42.24	32.96	0.35
Owner-Occupied Housing by Geography	318,049	2.73	15.15	42.58	39.41	0.13
Occupied Rental Units by Geography	110,413	11.09	31.51	39.81	16.77	0.81
Vacant Units by Geography	27,967	8.49	18.93	47.99	23.54	1.05
Businesses by Geography	42,644	2.80	14.17	37.12	45.33	0.58
Farms by Geography	1,636	2.63	16.32	48.23	32.64	0.18
Family Distribution by Income Level	308,378	19.84	17.24	21.25	41.68	0.00
Household Distribution by Income Level	428,462	22.66	15.38	17.95	44.01	0.00
Unemployment rate (%)	5.24	10.78	6.12	5.28	4.15	1.40
Households Below Poverty Level (%)	8.08	23.38	13.19	7.31	3.75	21.57
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		$92,622			Median Housing Value	$228,400
Median Family Income (29404 - Lake County, IL MD)		$105,876			Median Gross Rent	$1,183
Median Family Income (Non-MSAs - WI)		$71,740			Families Below Poverty Level	5.57
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2023		$109,800				
Median Family Income (29404 - Lake County, IL MD) for 2023		$124,600				
Median Family Income (Non-MSAs - WI) for 2023		$86,000				

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 Contacts

As part of the CRA evaluation, the OCC reviewed three community contacts in the AA conducted during the evaluation period, which included a community group that focuses on counseling, education, and housing resources to assist LMI families, and a multifunctional non-profit housing organization that develops affordable housing and supports long-term affordability and financial stability for LMI individuals. Both groups identified affordable housing as a significant need within the AA, including subsidies for LMI individuals looking to purchase a home, as well as credit building loans, microloans, down payment assistance programs, and more financial literacy classes. The third community contact focuses on providing small business financing to Black, Hispanic/Latinx, women and low-income entrepreneurs.

Housing Units

The Chicago-Naperville-Elgin IL-IN-WI MMSA contains 456,429 housing units. Housing units located in LMI CTs account for 24.4 percent of the total housing stock. While owner-occupied units represent the majority of housing units overall, only 17.8 percent of these units are in LMI geographies. The limited supply of owner-occupied units in LMI areas may constrain homeownership opportunities for LMI households and influence the demand for affordable mortgage products.

Housing Affordability

Based on information in the demographic table provided above, low-income families within the Chicago-Naperville-Elgin IL-IN-WI MMSA earned less than $4,450 monthly and moderate-income families earned less than $7,120 monthly. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This is calculated to a maximum monthly mortgage payment of $1,335 for low-income borrowers and $2,136 for moderate-income borrowers. Assuming a 30-year mortgage with a six 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 $1,572. Low-income borrowers would face significant challenges in affording a mortgage loan in this AA.

Employment and Economic Factors

Based on the November 2023 Moody's Analytics report, the Chicago-Naperville-Elgin, IL-IN-WI MMSA's economy demonstrated moderate but uneven growth during 2022-2023, reflecting continued post-pandemic normalization alongside below-national employment expansion trends, consistent with Moody's characterization of a large, diversified but slower-growing metro economy. Employment gains were modest and uneven across sectors, with strength in healthcare and service industries offset by weakness in professional services and information sectors. The top five employers in the area are the federal and state government, Amazon, Advocate Health Care Systems, Northwestern Memorial Healthcare, and the University of Chicago.

According to the U.S. Bureau of Labor Statistics, the unemployment rate averaged in the mid-4 percent range during 2022-2023, declining modestly from approximately 4.6 - 4.7 percent in 2022 to approximately 4.3 - 4.6 percent in 2023 based on the U.S. Bureau of Labor Statistics data. The trend reflects continued labor market recovery with stabilization in 2023, although unemployment levels remained slightly elevated relative to national averages, consistent with the areas comparatively slower employment growth.

Scope of Evaluation in Chicago-Naperville-Elgin, IL-IN-WI

The Chicago-Naperville-Elgin, IL-IN-WI MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

The OCC gave greater weight to small loans to businesses due to the high lending volume. Home mortgage loans received less weight than small loans to 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 is difficult for many LMI borrowers to afford a home as the area's median housing value is 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 analysis of loans to small businesses, the OCC considered the competitive market condition in the AA. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders nominally affects 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 Chicago-Naperville-Elgin, IL-IN-WI MMSA

LENDING TEST

The bank's performance under the Lending Test in the Chicago-Naperville-Elgin, IL-IN-WI MMSA 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-WI MMSA was excellent.

The Chicago-Naperville-Elgin, IL-IN-WI MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs. Examiners considered the substantial volume of loans originated through an affiliate charter.

Table 3: Lending Activity								2022 - 2023
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Chicago-Naperville-Elgin IL-IN-WI MMSA AA	79	1,059	2	21	0	1,140	100.00	100.00
Total	**79**	**1,059**	**2**	21	**0**	**1,140**	**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-Naperville-Elgin IL-IN-WI MMSA AA	26,177	93,431	150	30,046	0	119,758	100.00	100.00
Total	**26,177**	**93,431**	**150**	**30,046**	**0**	**119,758**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2023 Bank Data. *Due to rounding, totals may not equal 100.0%*								

According to FDIC Deposit Market Share data as of June 30, 2023, the bank had $1.7 billion in deposits with a deposit share of 3.6 percent. The bank's deposit market share ranked 8th out of 52 deposit taking institutions. The five largest competitors in the AA were JPMorgan Chase Bank, N.A., Lake Forest Bank & Trust Company, N.A., BMO Harris Bank N.A., Old National Bank, and Barrington Bank & Trust Company, N.A., which collectively represented 48.8 percent of total deposit market share.

According to 2023 peer mortgage data, SBotL had a 0.14 percent market share of home mortgage originations. Home mortgage lending is not a primary product, and the bank generally refers home loans to an affiliate, WM. SBotL's market share of home mortgage originations was weaker than its deposit

market share. SBotL's mortgage originations ranked 108 out of 544 home mortgage lenders. The bank's market share ranking of home mortgage loan originations was weaker than its deposit market share. The top five institutions by deposit market share were US Bank N.A., Guaranteed Rate, JPMorgan Chase Bank N.A., United Wholesale Mortgage, and Rocket Mortgage. The five largest home mortgage lenders had a combined home mortgage market share rate of 19.33 percent.

According to 2023 peer small business data, the bank ranked 9th in the market of 134 small business lenders with a market share of 1.6 percent. The top five small business loan lenders by number of loans and market share were JPMorgan Chase N.A., American Express N.A., Citibank N.A., Capital One N.A., and US Bank N.A. These top five lenders affect the bank's ability to make loans to small businesses.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units in those geographies and the aggregate percentage.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

The percentages of small loans to businesses originated or purchased in both LMI geographies exceeded the percentages of businesses located in those geographies and the aggregate distribution of small loans to businesses.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any conspicuous lending gaps existed. We did not identify any conspicuous lending gaps inside the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for both LMI borrowers.

The bank's percentage of home mortgage loans to low-income borrowers exceeded both the percentage of low-income families and the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families but below the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes are good.

The bank did not collect or consider the gross annual revenues in the underwriting of 14.3 percent of its small loans to businesses. The bank purchases a substantial number of niche small business loans from FIRST, with Lake Forest Bank, an affiliated lender. Based on those businesses with known revenues, the percentage of small loans to businesses with revenues of $1 million or less was below the percentage of businesses with gross annual revenues of $1 million or less but exceeded the aggregate distribution of small loans to businesses.

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.

During the evaluation period, SBotL originated a total of 21 qualified CD loans to 13 different community organizations in the MMSA, totaling approximately $30 million or 15.9 percent of allocated tier 1 capital as of December 31, 2023. CD loans originated by the bank largely served in response to identified affordable housing and community service needs for LMI groups in the AA or served to provide financing for economic development projects in the AA. CD loans provided resources for local nonprofit organizations and included both working capital lines of credit and financing for transitional housing and building repair projects.

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

- A $10 million participation in an affordable housing project funding the construction of nine multifamily properties in the AA where the majority of the housing units were designated as LMI.
- A $1.1 million commercial real estate mortgage was made to a local non-profit organization operating in the AA to expand the provision of community services for LMI adults with disabilities.
- A $500,000 revolving line of credit was made and then renewed in 2023 to a local government agency to fund economic development projects in the AA.
- A $150,000 affordable housing loan was made refinancing a multifamily property in the AA where all the housing units were designated as LMI.

Product Innovation and Flexibility

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

As shown in the table below, a total of 499 loans in the amount of $10.1 million were funded under the following innovative and/or flexible lending programs. Refer to the comments in the "Product Innovation and Flexibility" section of this performance evaluation under the Scope of the Evaluation section above, for additional details regarding the programs.

2022-2023 Chicago-Naperville-Elgin, IL-IN-WI MMSA	
Loan Type	**Number of Loans**
Small Business Administration Loans	13
Easy Access Revolving Line of Credit	193
Easy Access Installment Loan	18
Easy Access Overdraft Protection Line	173
Money Smart Everyday Loan	91
Money Smart CD Secured Loan	11

INVESTMENT TEST

The institution's performance under the Investment Test in Chicago-Naperville-Elgin, IL-IN-WI MMSA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

The institution exhibited excellent responsiveness to credit and CD needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										2022-2023
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-WI MMSA AA	9	3,551	107	7,920	116	88.5	11,471	83.7	3	544
Broader Statewide or Regional Area	4	1,972	11	258	15	11.5	2,230	16.3	0	0
Total	13	5,523	118	8,178	131	100	13,701	100	3	544

The dollar volume of current- and prior- period investments (excluding unfunded commitments) represented 6.2 percent of allocated tier 1 capital. SBotL had 116 qualified investments and grants in the MMSA totaling $11.5million. By dollar volume, 39.1 percent of total investments and grants supported affordable housing, 31.9 percent promoted economic development, 28.8 percent supported community services to LMI individuals, and 0.2 percent funded revitalization and stabilization efforts.

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 and grants in the broader statewide and regional areas amounted to approximately $2.2 million in total. During the current evaluation period, $1.9 million was invested in small business investment company funds and in MDIs and CDFIs that promoted economic development and provided loans for affordable housing. Additionally, the bank provided 10 grants totaling $37,381, including 8 grants for community services ($19,286), one grant for economic development ($1,428), and one grant for affordable housing ($16,666). The bank also had three unfunded commitments totaling approximately $544,000 that, once funded, are expected to support additional economic development and community services activities.

Prior period investments in the regional area totaled approximately $1.9 million and included a loan pool investment supporting economic development. Collectively, these qualified investments and grants enhanced access to credit, housing, and community services for LMI individuals and small businesses in the regional area and supported the Investment Test conclusion.

The following are examples of qualified investments in the MMSA:

- Eleven investments in CDFIs during the 2022-2023 period, totaling $2.5 million. The investments supported six different CDFIs, some of which were also MDIs or Women-owned Depository Institutions (WDI). These investments supported economic development within the bank's AA.

- A $2.0 million investment in a Low-Income Housing Tax Credit (LIHTC) project to demolish a distressed vacant commercial building and replace it with an affordable housing community for LMI seniors. The building will include 34 units restricted to 60 percent of the area median

income (AMI) for residents 55 and older. The first floor will include commercial space that will serve as the main office for a community development organization.

- A $50,000 investment in a loan fund financing home improvements for LMI homeowners. The loans are used to finance critical and essential repairs related to code compliance, health and safety, and home modifications needed for accessibility.

SERVICE TEST

The bank's performance under the Service Test in Chicago-Naperville-Elgin, IL-IN-WI MMSA 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-WI MMSA was good.

Retail Banking Services

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

Table 5: Distribution of Branch Delivery Systems														2022- 2023
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-WI MMSA AA	100.00	9	100.00	0	11.1	55.6	33.3	0	5.04	19.19	39.81	34.80	1.16
Total	100.00	9	100.00	0	11.1	55.6	33.3	0	5.04	19.19	39.81	34.80	1.16
Source: FFIEC File - 2020 Census *1/1/2022 - 12/31/2023 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 had nine branch offices, including one branch within a moderate-income geography. There were no branches located within low-income geographies. The percentage of branches in low-income geographies was below the percentage of the population in those geographies. The percentage of branches in moderate-income geographies was below the percentage of the population in those geographies.

Examiners further considered MUI branches that enhanced access for LMI individuals or geographies within the AA. Examiners reviewed the data on accounts held at four MUI branches that were within one mile of the LMI CTs and determined the nearby branches were serving nearby LMI geographies. Two of the branches were located within the state of Illinois portion of the MMSA and the other two branches were located within the state of Wisconsin portion of the MMSA. Each branch was located within approximately one mile of portions of moderate-income AA geographies. Bank management analyzed customer account and transaction data for the four branches and determined that the branches enhanced accessibility to the bank's service delivery systems for residents within LMI geographies. According to management's analysis, 23.0 percent and 50.0 percent, respectively, of accounts serviced by the two Illinois branches were accounts held by customers residing in low- and-moderate-income

geographies. Also, according to the bank's analysis, 14.0 percent and 24.0 percent respectively of accounts serviced by the two Wisconsin branches were accounts held by customers residing in LMI geographies.

SBotL customers can conduct banking transactions and obtain bank products and services at any of over 200 branches owned by other Wintrust Financial-affiliated banks. Within the bank's AA, during the 2022-2023 analysis period, bank customers had access to a total of 30 affiliate branch offices within the AA, including 21 branches of other affiliate banks. Of these 21 affiliate branch offices, two branches were located within moderate-income geographies in Illinois, and two branches were located within moderate-income geographies in Wisconsin. The additional branches owned by affiliated banks within the AA significantly enhanced SBotL' s customer accessibility to bank service delivery systems.

SBotL complements its traditional service delivery system with alternative delivery systems (ADS), which includes deposit-taking ATMs, online and mobile banking, telebanking, and electronic bill pay. The bank operated nine deposit-taking ATMs within the AA, with one located within a moderate-income geography. There were no ATMs located within low-income geographies, but customers have access to all Wintrust ATMs. The bank also offered flexible deposit products and retail services, including Money Smart Checking and Savings accounts.

Table 6: Distribution of Branch Openings/Closings **2022-2023**

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-WI MMSA AA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0

1/1/2022 – 12/31/2023 Bank Data.

The bank did not open or close any branch offices during the analysis period.

Services, including where appropriate business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the geography. 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.

Community Development Services

The institution was a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation periods, 23 different bank employees from various lines of business served as treasurers, secretaries, and members of boards, finance, and fundraising committees providing approximately 4,325 hours in community development services to 24 different community-based organizations. Services reflected ongoing relationships with multiple community-based organizations.

The following are examples of CD services:

- Five bank employees served approximately 2,942 hours over the analysis period serving as student coordinators for an AA college preparatory school catering to students from low-income households.

- Four bank employees spent approximately 136 hours serving as secretary and board members for three different chambers of commerce. These chambers of commerce had missions to advance the economic, industrial, professional, cultural, and civic welfare of local areas by supporting local, small businesses and residents.

- Three bank employees spent approximately 67 hours serving as treasurer, board member, or in fundraising roles for a non-profit, community-based organization serving underserved families in a moderate-income geography.

- Sixteen different bank employees, serving as FDIC Money Smart facilitators, provided approximately 254 hours in financial education in partnership with 23 different community-based organizations.

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.

State Rating

State of Illinois

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

The major factors that support this rating include:

- Lending activity reflects adequate responsiveness to credit needs in the bank AA.
- The bank exhibits good geographic and borrower distribution of loans in its AA.
- The bank made an excellent level of CD loans. The level of CD-lending had a positive impact on the lending test.
- The institution had a good level of qualified investment, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.
- Service delivery systems were 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 Illinois

SBotL AA consists of the entirety of Lake County in Lake County, IL-IN MD and McHenry County in the Chicago-Naperville-Elgin IL-IN MD. The Lake County and Kenosha County portions of the AA were part of the Lake-Kenosha County IL WI MD prior to 2024. As a result of the OMB change, Lake County and Kenosha County were separated into Lake County, IL MD and Kenosha County, WI MSA.

As of December 31, 2025, SBotL operated six branch locations and seven deposit-taking ATMs across the two counties. Throughout the 2024-2025 evaluation period, the AA was comprised of 224 contiguous CTs which included 13 low-income CTs, 44 moderate-income CTs, 76 middle-income CTs, 87 upper-income CTs, and four CTs with income not reported. The AA meets regulatory requirements and does not arbitrarily exclude any LMI geographies.

State of Illinois

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

Assessment Area(s) - Chicago-Naperville-Elgin IL-IN MSA AA						
						2024 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	224	5.80	19.64	33.93	38.84	1.79
Population by Geography	1,024,571	5.03	20.56	34.66	38.65	1.10
Housing Units by Geography	383,581	5.39	20.67	36.69	37.24	0.01
Owner-Occupied Housing by Geography	273,671	2.44	17.12	36.97	43.47	0.00
Occupied Rental Units by Geography	88,282	13.76	31.36	34.95	19.91	0.03
Vacant Units by Geography	21,628	8.57	21.93	40.34	29.12	0.04
Businesses by Geography	33,165	2.64	15.35	32.75	49.16	0.10
Farms by Geography	1,253	3.19	20.59	41.66	34.56	0.00
Family Distribution by Income Level	264,890	19.55	17.03	21.24	42.18	0.00
Household Distribution by Income Level	361,953	22.44	15.33	17.90	44.33	0.00
Unemployment rate (%)	5.06	10.30	5.78	5.25	4.07	0.11
Households Below Poverty Level (%)	7.51	23.18	11.54	6.97	3.68	0.00
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		$92,622			Median Housing Value	$236,900
Median Family Income (29404 - Lake County, IL MD)		$112,326			Median Gross Rent	$1,250
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2025		$117,400			Families Below Poverty Level	5.17
Median Family Income (29404 - Lake County, IL MD) for 2025		$143,000				

FFIEC File - 2024 Census
2025 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 Contacts

As part of the CRA evaluation, the OCC reviewed two community contacts in the AA conducted during the evaluation period, which included a community group that focuses on counseling, education, and housing resources to assist LMI families, and a small business organization that provides capital, coaching, and connections to help entrepreneurs establish small businesses that create jobs and wealth in the community. The community group identified affordable housing as a significant need, and the small business group identified a need for banks to provide capital loans to small entrepreneurs ranging from $500 to $100,000.

Housing Units

The Chicago-Naperville-Elgin IL-IN MSA contains 383,581 housing units. Housing units located in LMI CTs account for 26.0 percent of the total housing stock. While owner-occupied units represent the majority of housing units overall, only 19.6 percent of these units are in LMI geographies. The limited supply of owner-occupied units in LMI areas may constrain homeownership opportunities for LMI households and influence the demand for affordable mortgage products.

Housing Affordability

Based on information in the demographic table provided above, low-income families within the Chicago-Naperville-Elgin IL-IN MSA earned less than $5,425 monthly and moderate-income families earned less than $8,680 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 is calculated to a maximum monthly mortgage payment of $1,628 for low-income borrowers and $2,604 for moderate-income borrowers. Assuming a 30-year mortgage with a six 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 $1,630. Low-income borrowers would face minimal challenges in affording a mortgage loan in this AA.

Employment and Economic Factors

Based on the November 2025 Moody's Analytics report, the Chicago-Naperville-Elgin, IL-IN MSA's economy is improving. Payroll growth has increased over the last few months led by the healthcare industry. The area's logistics and finance jobs have recovered to prior year levels. Increases in construction employment have resulted in modest homebuilding increases throughout the area. Housing market prices are continuing to rise at a stronger pace than most urban areas. Weaknesses in the area include retail and professional/business services employment continuing to decline and average weekly employment hours falling below average, suggesting that firms are reducing workforce. The top five employers in the area are the federal and state government, Amazon, Advocate Health Care System, Northwestern Memorial Healthcare, and the University of Chicago. The Moody's Analytics report projects that the area's economic growth will slow in the near term as professional and business services have a lot working against them. In the long term, Moody's Analytics projects the area will underperform due to population loss and weak public finances.

According to the U.S. Bureau of Labor Statistics, the unemployment rate in McHenry County averaged 4.4 percent across 2024-2025. The average increased from 3.8 percent during the 2022-2023 period. The unemployment rate saw a peak high of 5.3 percent in June 2024. The unemployment rate in Lake County averaged 4.8 percent across 2024-2025, remaining consistent from 4.8 percent in 2022-2023. The Lake County unemployment rate saw a peak high of 6.6 percent in January 2024. The average 2024-2025 Illinois statewide unemployment rate of 4.9 percent was higher than both McHenry and Lake Counties, while the average national unemployment rate of 4.1 percent during the same time period was lower than both counties.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF 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 AA was excellent.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs. Examiners considered the substantial volume of loans originated through an affiliate charter.

Table 3: Lending Activity								2024 - 2025
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Chicago-Naperville-Elgin IL-IN MSA AA	47	942	1	14	0	990	100.00	100.00
Total	**47**	**942**	**1**	14	**0**	**990**	**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-Naperville-Elgin IL-IN MSA AA	14,230	70,514	20	20,400	0	84,764	100.00	100.00
Total	**14,230**	**70,514**	**20**	**20,400**	**0**	**84,764**	**100.00**	**100.00**
Source: 1/1/2024 - 12/31/2025 Bank Data. *Due to rounding, totals may not equal 100.0%*								

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

According to FDIC Deposit Market Share data as of June 30, 2025, the bank ranked 7th out of 39 banks with a deposit share of 4.2 percent in the AA. The five largest competitors in the AA are JPMorgan Chase Bank, N.A., Lake Forest Bank & Trust Company, N.A., BMO Bank N.A., Old National Bank, and Libertyville Bank & Trust Company, N.A., Company which collectively represented 55.1 percent of total deposit market share.

According to the 2024 peer mortgage data, SBotL had a 0.1 percent market share of home mortgage originations. SBotL's market share of home mortgage originations was weaker than its deposit market share. SBotL's mortgage originations ranked 115 out of 503 home mortgage lenders The bank's market share ranking of home mortgage loan originations was weaker than its deposit market share. The five largest home mortgage lenders have captured 19.2 percent of the market based on the 2024 mortgage data. Home mortgage lending is not a primary product, and the bank generally refers home loans to an affiliate, Wintrust Mortgage.

According to the 2024 peer small business data, SBotL had a 1.4 percent market share of small business loan originations. SBotL's market share of small originations was weaker than its deposit market share. SBotL's market share of small business loan originations ranked 10th out of 132 small business lenders. The bank's market share ranking of small business loan originations was weaker than its deposit share ranking. The five largest small business lenders captured 74.9 percent of the market. The top five lenders were JPMorgan Chase N.A., American Express N.A., Citibank N.A., Capital One N.A., and US Bank N.A. These top five lenders affect the bank's ability to make loans to small businesses.

Distribution of Loans by Income Level of the Geography

The bank exhibited 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 excellent.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units in those geographies and 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 distribution of small loans to businesses was good.

The percentage of small loans to businesses originated in low-income geographies was below the percentage of businesses located in those geographies and the near to the aggregate distribution of loans. The distribution of small loans to moderate-income geographies exceeded both the percentage of businesses located in those geographies and aggregate distribution of loans.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any conspicuous lending gaps existed. We did not identify any conspicuous lending gaps inside the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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.

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies 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 geographic distribution of small loans to business was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of 18.6 percent of its small loans to businesses. The bank purchases a substantial number of niche small business loans from FIRST, with Lake Forest Bank, an affiliated lender. Based on those businesses with known revenues, the percentage of small loans to businesses with revenues of $1 million or less 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.

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.

SBotL originated 14 qualified loans to 10 different community organizations in the Illinois AA, totaling approximately $20.4 million or 10.2 percent of allocated tier 1 capital as of December 31, 2025. CD loans originated by the bank largely served in response to identified affordable housing and community service needs for LMI groups in the AA or served to provide financing for economic development projects in the AA. CD loans provided resources for local nonprofit organizations and included both working capital lines of credit and financing for transitional housing and building repair projects.

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

- A $4.2 million participation in a project funding the construction of multifamily housing providing 50 units of affordable rental housing in the AA where the majority of the units are LMI restricted.

- A $1.4 million participation in an affordable housing project funding the construction of 34 senior housing rental units designated for LMI tenants.

- A $1 million revolving line of credit was renewed for a local non-profit that provides community services for LMI groups within the AA.

- A $500,000 revolving line of credit was twice renewed to a local government agency to fund economic development projects in the AA.

Product Innovation and Flexibility

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

As shown in the table below, a total of 427 loans in the amount of $12.9 million were funded under the following innovative and/or flexible lending programs. Refer to the comments in the "Product Innovation and Flexibility" section of this performance evaluation under the Scope of the Evaluation section above, for additional details regarding the programs.

2024-2025 Chicago-Naperville-Elgin, IL-IN	
Loan Type	**Number of Loans**
Small Business Administration Loans	8
Easy Access Revolving Line of Credit	195
Easy Access Installment Loan	6
Easy Access Overdraft Protection Line	141
Money Smart Everyday Loan	73
Money Smart CD Secured Loan	4

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

The institution exhibited excellent responsiveness to credit and CD needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*										2024-2025
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	0	0	112	11,625	112	89.6	11,625	99.8	0	0
Broader Statewide or Regional Area	0	0	13	21	13	10.4	21	0.2	0	0
Total	0	0	125	11,646	125	100.00	11,646	100.00	0	0

* 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 (excluding unfunded commitments) represented 4.9 percent of allocated tier 1 capital. By dollar volume during the current period, 73.5 percent of total investments and grants supported affordable housing, 18.8 percent promoted economic development, 7.7 percent supported community services to LMI individuals, and 0.1 percent funded revitalization and stabilization efforts.

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

The 13 grants in the broader statewide and regional areas amounted to approximately $21,000 in total including 11 grants for community services ($19,642), one grant for economic development ($1,428), and one grant for affordable housing ($214).

The following are examples of qualified investments in the AA:

- A $6.5 million investment in a LIHTC project to build a 40-unit affordable senior housing development. Of the 40 units, 27 will be restricted to tenants earning up to 60 percent of the AMI, one unit will be restricted to 50 percent AMI, and 12 units will be restricted to 30 percent AMI. This investment supports affordable housing, an identified need in the AA.

- Nine investments in CDFIs during the 2024-2025 period, totaling $2.1 million. The investments supported five different CDFIs, some of which were also MDIs or WDIs. These investments supported economic development within the bank's AA.

- Two multifamily mortgage-backed security investments during the 2024-2025 period, totaling $2.0 million. The investments are secured by LIHTC apartment complexes and support affordable housing. Combined, the complexes provide 352 units for LMI individuals and families.

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													2024 2025
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 AA	83.00	6	60.00	0	0	83.3	17.7	0	5.03	20.56	34.66	38.65	1.1
Total	83.00	6	60.00	0	0	83.3	17.7	0	5.03	20.56	34.66	38.65	1.1
Source: FFIEC File – 2024 Census *1/1/2024 – 12/31/2025 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 operated six branch offices in the AA. There were no branches located within low- or moderate-income AA geographies. The bank's proportions of branch offices located within both LMI geographies were significantly below the proportion of the population residing within those LMI geographies.

Examiners further considered MUI branches that enhanced access for LMI individuals or geographies within the AA. Examiners reviewed the data on accounts held at the MUI branches that were within one mile from LMI CTs and determined two middle-income branches were serving moderate-income geographies within the AA. Bank management analyzed customer data for these two branches and determined the branches enhanced accessibility to the bank's service delivery systems for residents in LMI geographies. Approximately 23.0 percent and 50.0 percent, respectively, of accounts serviced by those branches were held by customers residing in LMI geographies.

SBotL customers can conduct banking transactions and obtain bank products and services at any of over 200 branches owned by other Wintrust Financial-affiliated banks. There are four affiliate bank branches in low- and moderate- income tracts in the AA that are available to SBotL customers. These branches allow the bank to provide access to LMI customers in these communities.

SBotL complements its traditional service delivery system with alternative delivery systems (ADS), which includes deposit-taking ATMs, online and mobile banking, telebanking, and electronic bill pay.

The bank operated six deposit-taking ATMs within the AA. There were no ATMs located within low- or moderate-income geographies. Customers have access to all Wintrust ATMs, of which there are 19 located in low-income CTs and 44 in moderate-income CTs. The bank also offered flexible deposit products and retail services, including Money Smart Checking and Savings accounts. These ADS had a positive impact on the retail banking services conclusion.

Table 6: Distribution of Branch Openings/Closings							2024-2025
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	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
1/1/2024 - 12/31/2025 Bank Data.							

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 LMI geographies and/or to LMI individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the geography. 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.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, 17 different bank employees from various lines of business served secretaries, members of boards, and committees as well as student coordinators, providing approximately 3,488 hours in community development services to 11 different community-based organizations. Services reflected ongoing relationships with multiple community-based organizations.

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

- Eight bank employees spent approximately 486 hours over the analysis period serving as trustee, board chair, board members or in fundraising roles for a local education foundation.

- Five bank employees spent approximately 231 hours over the analysis period serving as secretary and board members for three different AA chambers of commerce.

- An assistant vice president and branch manager spent approximately 13 hours over the analysis period serving as treasurer and board member for a local non-profit community-based organization.

- Nine different bank employees, who served as FDIC Money Smart facilitators, provided approximately 166 hours in financial education instruction in partnership with 12 different community-based organizations.

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 882 hours of financial education to small businesses and LMI individuals and students from LMI families in the AA.

State Rating

State of Wisconsin

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

The major factors that support this rating include:

- Lending activity reflects good responsiveness to credit needs in the bank AA.
- The bank exhibits excellent geographic distribution and good borrower distribution of loans in its AA.
- The bank made an excellent level of CD loans. The level of CD-lending had a positive impact on the lending test.
- The institution had a good level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.
- Service delivery systems are 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 Wisconsin

As of December 31, 2025, SBotL had one delineated AA in Wisconsin, which is composed of the Kenosha, WI MSA and one CT within Walworth County adjacent to Kenosha County. The AA was established after the 2023 OMB change, removing Kenosha County from the Lake County-Kenosha County IL-WI MD that was previously part of the Chicago-Naperville-Elgin MMSA.

As of December 31, 2025, SBotL operated four branch locations and three deposit taking ATMs across the AA. During 2024-2025, the AA was comprised of 44 CTs that included two low-income CTs, 11 moderate-income CTs, 17 middle-income CTs, 12 upper-income CTs, and two CTs with income not reported. The AA meets regulatory requirements and does not arbitrarily exclude any LMI geographies.

State of Wisconsin

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

Assessment Area(s) - Kenosha and Walworth Counties 2025						
						2024 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	4.55	25.00	38.64	27.27	4.55
Population by Geography	174,471	4.31	24.15	39.37	30.67	1.50
Housing Units by Geography	72,848	4.30	22.84	41.71	28.98	2.17
Owner-Occupied Housing by Geography	44,378	2.70	17.12	43.73	35.49	0.95
Occupied Rental Units by Geography	22,131	6.97	34.16	36.71	18.22	3.94
Vacant Units by Geography	6,339	6.17	23.27	45.07	20.98	4.51
Businesses by Geography	3,667	4.53	22.25	37.39	30.05	5.78
Farms by Geography	172	3.49	15.12	44.77	34.88	1.74
Family Distribution by Income Level	43,488	20.55	17.94	21.90	39.61	0.00
Household Distribution by Income Level	66,509	23.92	15.65	18.76	41.67	0.00
Unemployment rate (%)	6.28	14.52	6.47	5.28	6.23	9.77
Households Below Poverty Level (%)	11.19	36.05	17.89	7.06	7.66	22.01
Median Family Income (28450 - Kenosha, WI MSA)		$82,340			Median Housing Value	$177,300
Median Family Income (Non-MSAs - WI)		$71,403			Median Gross Rent	$958
Median Family Income (28450 - Kenosha, WI MSA) for 2025		$112,600			Families Below Poverty Level	7.98
Median Family Income (Non-MSAs - WI) for 2025		$92,800				

FFIEC File - 2024 Census
2025 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 Contacts

As part of the CRA evaluation, the OCC reviewed one community contact in the AA during the evaluation period, a public-private economic development organization that leads business attraction, retention and expansion efforts. The contact partners with local governments, financial institutions, and private employers to promote economic growth, facilitate business financing, and support job creation. The contact identified the most significant credit needs within the assessment area are related to small business financing, flexible underwriting, and workforce development.

Housing Units

The Kenosha and Walworth Counties AA contain 72,848 housing units. Housing units located in LMI CTs account for 27.1 percent of the total housing stock. While owner-occupied units represent the majority of housing units overall, only 19.8 percent of these units are in LMI geographies. The limited supply of owner-occupied units in LMI areas may constrain homeownership opportunities for LMI households and influence the demand for affordable mortgage products.

Housing Affordability

Based on information in the demographic table provided above, low-income families within the Kenosha and Walworth Counties AA earned less than $4,279 monthly and moderate-income families earned less than $6,847 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 $961 for low-income borrowers and $1,284 for moderate-income borrowers. Assuming a 30-year mortgage with a six 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 Wisconsin MSA median housing value would be $1,220. Low-income borrowers would face significant challenges in affording a mortgage loan in this AA.

Employment and Economic Factors

Based on the October 2025 Moody's Analytics report, Wisconsin's economy is improving. The labor market is increasing with monthly job growth exceeding national and regional paces. The area's economy is being driven by healthcare and leisure/hospitality industries. Wage growth has started seeing improvements throughout the year with average weekly hours surpassing that of early 2024. Weaknesses of the area include the manufacturing industry slowing and while the area unemployment rate has declined, this was due to a reduction in labor force rather than additional jobs being filled. The top five employers in the area include state and federal government, the University of Wisconsin, UW Health, Kwik Trip Stores Inc., and Oshkosh Corp. The Moody's Analytic report projects that the area's economy will flatten over the next year with limited manufacturing performance causing the state to underperform compared to the national average. In the long term, Moody's Analytics projects the strong performance in the homebuilding and healthcare industries, and above-average housing affordability, will outweigh the limited productivity in manufacturing.

According to the U.S. Bureau of Labor Statistics, the unemployment rate in Kenosha County averaged 3.3 percent across 2024-2025. The unemployment rate saw a peak high of 4.0 in February 2025. The unemployment rate in Walworth County averaged 2.9 percent across 2024-2025. The average 2024-2025 Wisconsin statewide unemployment rate of 3.1 percent was lower than Kenosha County but higher than Walworth County, while the average national unemployment rate of 4.1 percent during the same time period was higher than both counties.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Kenosha and Walworth Counties was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA(s) credit needs.

Table 3: Lending Activity								2024 - 2025
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Kenosha and Walworth Counties 2025	19	260	0	6	0	279	100.00	100.00
Total	**19**	**260**	**0**	**6**	**0**	**279**	**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**
Kenosha and Walworth Counties 2025	9,414	27,954	0	8,560	0	37,368	100.00	100.00

Total	**9,414**	**27,954**	**0**	**8,560**	**0**	**37,368**	**100.00**	**100.00**
Source: 1/1/2024 - 12/31/2025 Bank Data. *Due to rounding, totals may not equal 100.0%*								

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

According to FDIC Deposit Market Share data as of June 30, 2025, the bank had $286 million in deposits with a 4.8 percent deposit market share. SBotL's deposit market share ranked 10th out of 19 deposit taking institutions. The three largest competitors in the AA are JPMorgan Chase Bank N.A., Johnson Bank, and BMO Bank N.A., which collectively represented 42.8 percent of the total deposit market share.

SBotL HMDA lending was below the threshold of 20 loans which is required to conduct a meaningful analysis. An 8% increase in the median housing value limited access to affordable home ownership among low-income borrowers.

According to the 2024 peer mortgage data, the bank had a 0.2 percent market share of home mortgage originations. Home mortgage lending is not a primary product, and the bank generally refers home loans to an affiliate, WM. SBotL's market share of home mortgage originations was weaker than its deposit market share. SBotL's mortgage originations ranked 58 out of 253 home mortgage lenders. The bank's market share ranking of home mortgage loan originations was weaker than its deposit market share. The top five home mortgage lenders by number of loans and market share were Educators Credit Union, Johnson Bank, Trustone Financial Credit Union, Gateway Mortgage Corporation, and Rocket Mortgage. The five largest home mortgage lenders had a combined home mortgage market share of 28.0 percent.

According to the 2024 small business data, SBotL had a 2.0 percent market share of small business loan originations. SBotL's market share of small business loan originations was weaker than its deposit market share. SBotL ranked eighth out of 83 small business loan lenders. The bank's market share ranking of small business loan originations was stronger than its deposit market share ranking. The five largest competitors in the AA were JPMorgan Chase Bank, N.A., American Express N.A., US Bank N.A., Capital One N.A., and Citibank N.A., which collectively represented 72.6 percent of the total small business loan market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table 7 in the state of Wisconsin 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. Home mortgage lending is not a primary product, and the bank generally refers home loans to an affiliate, WM.

The percentage of home mortgage loans originated or purchased in low- income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below both the percentage of owner-occupied housing units in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to businesses in moderate- income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any conspicuous lending gaps existed. We did not identify any conspicuous lending gaps inside the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good amount 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 Wisconsin 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.

This distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability mostly for low-income borrowers.

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgages to moderate- income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table 10 in the state of Wisconsin 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 was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of 25.0 percent of its small loans to businesses. The bank purchases a substantial number of niche small business loans from FIRST, with Lake Forest Bank, an affiliated lender. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of $1 million or less 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.

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.

During the evaluation period, SBotL originated a total of six qualified loans to four different community organizations in the Wisconsin AA, totaling approximately $8.6 million or 25.3 percent of allocated tier 1 capital as of December 31, 2025. CD loans originated by the bank largely served in response to identified affordable housing and community service needs for LMI groups in the AA. CD loans provided resources for local nonprofit organizations and included both working capital lines of credit and financing for transitional housing and building repair projects.

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

- A $4.8 million loan participation to a local community organization to fund the purchase of three skilled nursing facilities in the AA where the majority of community services are provided to LMI populations.

- A $910,000 loan to fund the purchase of a multifamily housing property where the majority of the units are designated for LMI tenants.

- A $850,000 refinance loan to fund the purchase of a multifamily building in the AA where the majority of the tenants are designated as LMI.

- A $500,000 revolving line of credit was made and then renewed in 2025 to a local non-profit organization that provides community services for LMI adults with disability.

Product Innovation and Flexibility

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

As shown in the table below, a total of 82 loans in the amount of $1.1 million were funded under the following innovative and/or flexible lending programs. Refer to the comments in the "Product Innovation and Flexibility" section of this performance evaluation under the Scope of the Evaluation section above, for additional details regarding the programs.

2024-2025 Kenosha WI	
Loan Type	**Number of Loans**
Small Business Administration Loans	1
Easy Access Revolving Line of Credit	37
Easy Access Installment Loan	0

Easy Access Overdraft Protection Line	15
Money Smart Everyday Loan	23
Money Smart CD Secured Loan	6

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Kenosha and Walworth Counties AA was good.

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

Table 4: Qualified Investments* **2024-2025**

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Kenosha MSA	0	0	24	1,072	24	92.3	1,072	70.4	0	0
Broader Statewide or Regional Area	0	0	2	451	2	7.7	451	29.6	0	0
Total	0	0	26	1,523	26	100.00	1,523	100.00	0	0

* 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 (excluding unfunded commitments) represented 0.6 percent of allocated tier 1 capital. By dollar volume during the current period, 47.8 percent of investment promoted economic development, and 52.2 percent of investments supported community services to LMI individuals.

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 and grants in the broader statewide and regional areas amounted to approximately $518,000 in total. During the current evaluation period, $451,000 was invested in small business investment company funds and in MDIs and CDFIs that promoted economic development and provided loans for affordable housing. Additionally, the bank provided 21 grants totaling $67,088, including 12 grants for community services ($46,273), eight grants for economic development ($19,815), and one grant for affordable housing ($1,000).

The following are examples of qualified investments in the AA:

- A $225,000 investment to a CDFI, which is also a registered MDI, providing financial services to underserved populations and communities. This investment supports economic development in the AA.

- Seven donations, totaling $19,300, to an economic development organization. The organization works to attract new businesses, retain existing businesses, and attract, retain, and engage talent to the area.

- Two donations, totaling $33,333, to an organization providing college scholarships to low-income first-generation college students. These donations provide access to education for students who would otherwise not have the financial capacity to attend.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Kenosha and Walworth Counties AA was good.

Retail Banking Services

Service delivery systems are accessible to essentially all portions of the bank's AA including geographies and individuals of different income levels.

Table 5: Distribution of Branch Delivery Systems														2024-2025
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
Kenosha and Walworth Counties 2024-2025	17.0	4	40.00	25.00	0.00	50.00	25.00	0	4.31	24.15	39.37	30.67	1.5
Total	17.0	4	40.00	25.00	0.00	50.00	25.00	0	4.31	24.15	39.37	30.67	1.5
Source: FFIEC File – 2024 Census *1/1/2024 – 12/31/2025 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 operated four branch offices in the AA including one located within a low-income geography. There were no branches located within moderate-income geographies. The bank's proportion of branches located within low-income geographies exceeded the percentage of the population in those geographies. The percentage of branches in moderate-income geographies was significantly below the percentage of the population in those geographies.

Examiners further considered MUI branches that enhanced access for LMI individuals or geographies within the AA. Examiners reviewed data on accounts held at the MUI branches that were within one mile from LMI CTs and determined two middle-income branches were serving nearby LMI geographies withing the AA. Bank management analyzed customer account and transaction data for the two branches located in middle income geographies and determined that 14 .0 percent and 24.0 percent respectively of accounts served by those branches were held by customers residing in LMI geographies.

SBotL complements its traditional service delivery system with alternative delivery systems (ADS), which includes deposit-taking ATMs, online and mobile banking, telebanking, and electronic bill pay. Of these ATMs, one was located within a low-income geography. There were no ATMs located within moderate-income geographies. Customers have access to all Wintrust ATMs. The bank also offered

flexible deposit products and retail services, including Money Smart Checking and Savings accounts. These ADS had a positive impact on the retail banking services conclusion.

Table 6: Distribution of Branch Openings/Closings							2024-2025
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Kenosha and Walworth Counties 2024-2025	1	0	+1	0	0	0	0
Total	1	0	+1	0	0	0	0
Bank 1/1/2024 – 12/31/2025 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 improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the analysis period, the bank did not close any AA branch offices but opened one AA branch within a low-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and individuals. Services offered and branch hours are comparable among locations regardless of the income level of the geography. 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.

Community Development Services

The bank was a leader in providing CD services.

CD services were effective and responsive in addressing the community's needs. During the evaluation period, 11 different bank employees from various lines of business served as treasurers, and as members of boards and finance committees providing approximately 1,152 hours in community development services to 13 different community-based organizations.

Examples of services include the following:

- A business banking officer provided 252 hours of fundraising services to a non-profit community organization. The organization focused on charitable services and fundraising events to benefit the community, particularly youth and those in need.

- A business banking team-lead spent 54 hours serving as board chair for a non-profit foundation. The foundation supported the mission of an area technical college foundation, by aligning resources and investing in student needs through financial support and engagement.

- A business banking team-lead spent 28 hours serving an economic development organization that serves a Wisconsin AA county within which most businesses have annual revenues totaling $1.0 million or less.

- Also, over the 2024-2025 analysis period, two different bank employees served as FDIC Money Smart facilitators, and provided approximately 28 hours in financial education, instruction in partnership with four different community-based organizations.

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 882 hours of financial education to small businesses and LMI individuals and students from LMI families in the AA.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2025	
Bank Products Reviewed:	Home mortgage, small business, small farm, Community development loans, qualified investments, community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	Home mortgage, small business, Community development loans, qualified investments, community development services.
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
MMSA(s)		
Chicago-Naperville-Elgin, IL-IL-WI (2022-2023)	Full-Scope	
State of Illinois		
Chicago-Naperville-Elgin, IL-IN MSA (2024-2025)	Full-Scope	The Illinois regional footprint consists of Lake County and McHenry County.
State of Wisconsin		
Kenosha and Walworth Counties (2024-2025)	Full-Scope	The Wisconsin portion of SBotL's footprint consists of Kenosha County, in its entirety, and the single most southeastern census tract of Walworth County.

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
State Bank of the Lakes, NA.	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
Chicago-Naperville-Elgin, IL-IN-WI	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Illinois	Outstanding	High Satisfactory	High Satisfactory	High Satisfactory
State of Wisconsin	Outstanding	High Satisfactory	High Satisfactory	High Satisfactory

(*) 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 the 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): 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

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

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

Table 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 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-Naperville-Elgin IL-IN-WI MMSA	79	26,177	100.00	62,373	2.73	8.86	2.90	15.15	15.19	14.89	42.58	60.76	43.01	39.41	13.92	39.11	0.13	1.27	0.10
Total	**79**	**26,177**	**100.00**	**62,373**	**2.73**	**8.86**	**2.90**	**15.15**	**15.19**	**14.89**	**42.58**	**60.76**	**43.01**	**39.41**	**13.92**	**39.11**	**0.13**	**1.27**	**0.10**

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 **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-Naperville-Elgin IL-IN-WI MMSA	79	26,177	100.00	62,373	19.84	20.25	12.56	17.24	16.46	22.77	21.25	10.13	21.82	41.68	29.11	28.90	0.0	24.05	13.95
Total	**79**	**26,177**	**100.00**	**62,373**	**19.84**	**20.25**	**12.56**	**17.24**	**16.46**	**22.77**	**21.25**	**10.13**	**21.82**	**41.68**	**29.11**	**28.90**	0.0	**24.05**	**13.95**

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 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-Naperville-Elgin IL-IN-WI MMSA	1,059	93,431	100.00	60,915	2.80	4.25	2.34	14.17	16.62	11.80	37.12	56.37	36.24	45.33	21.72	49.22	0.58	1.04	0.40
Total	**1,059**	**93,431**	**100.00**	**60,915**	**2.80**	**4.25**	**2.34**	**14.17**	**16.62**	**11.80**	**37.12**	**56.37**	**36.24**	**45.33**	**21.72**	**49.22**	**0.58**	**1.04**	**0.40**

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 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022 - 2023**

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-Naperville-Elgin IL-IN-WI MMSA	1,059	93,431	100.00	60,915	85.81	59.49	55.41	5.30	26.16	8.89	14.35
Total	**1,059**	**93,431**	**100.00**	**60,915**	**85.81**	**59.49**	**55.41**	**5.30**	**26.16**	**8.89**	**14.35**

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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2024 - 2025**

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-Naperville-Elgin, IL-IN MSA	47	14,230	100.00	24,402	2.44	4.26	2.37	17.12	25.53	17.50	36.97	53.19	37.34	43.47	17.02	42.79	0.0	0.0	0.0
Total	**47**	**14,230**	**100.00**	**24,402**	**2.44**	**4.26**	**2.37**	**17.12**	**25.53**	**17.50**	**36.97**	**53.19**	**37.34**	**43.47**	**17.02**	**42.79**	0.0	0.0	0.0

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 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 **2024 - 2025**

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-Naperville-Elgin, IL-IN MSA	47	14,230	100.00	24,402	19.55	25.53	8.56	17.03	29.79	21.33	21.24	12.77	22.17	42.18	21.28	31.49	0.0	10.64	16.45
Total	**47**	**14,230**	**100.00**	**24,402**	**19.55**	**25.53**	**8.56**	**17.03**	**29.79**	**21.33**	**21.24**	**12.77**	**22.17**	**42.18**	**21.28**	**31.49**	0.0	**10.64**	**16.45**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 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 **2024 - 2025**

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-Naperville-Elgin, IL-IN MSA	942	70,514	100.00	29,972	2.64	1.91	2.14	15.35	19.00	13.92	32.75	48.30	30.88	49.16	30.79	53.06	0.10	0.0	0.0
Total	**942**	**70,514**	**100.00**	**29,972**	**2.64**	**1.91**	**2.14**	**15.35**	**19.00**	**13.92**	**32.75**	**48.30**	**30.88**	**49.16**	**30.79**	**53.06**	**0.10**	0.0	0.0

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "0" 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 **2024 - 2025**

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-Naperville-Elgin, IL-IN MSA	942	70,514	100.00	29,972	85.05	55.84	57.07	5.34	25.48	9.61	18.68
Total	**942**	**70,514**	**100.00**	**29,972**	**85.05**	**55.84**	**57.07**	**5.34**	**25.48**	**9.61**	**18.68**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2024 CRA 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 - 2025**

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
Kenosha and Walworth Counties	19	9,414	100.00	4,138	2.70	5.26	3.26	17.12	10.53	19.24	43.73	47.37	46.06	35.49	36.84	30.72	0.95	0.0	0.72
Total	**19**	**9,414**	**100.00**	**4,138**	**2.70**	**5.26**	**3.26**	**17.12**	**10.53**	**19.24**	**43.73**	**47.37**	**46.06**	**35.49**	**36.84**	**30.72**	**0.95**	0.0	**0.72**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 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 **2024 - 2025**

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
Kenosha and Walworth Counties	19	9,414	100.00	4,138	20.55	10.53	7.30	17.94	21.05	20.25	21.90	5.26	24.19	39.61	36.84	34.49	0.0	26.32	13.77
Total	**19**	**9,414**	**100.00**	**4,138**	**20.55**	**10.53**	**7.30**	**17.94**	**21.05**	**20.25**	**21.90**	**5.26**	**24.19**	**39.61**	**36.84**	**34.49**	0.0	**26.32**	**13.77**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 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 **2024 - 2025**

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
Kenosha and Walworth Counties	260	27,954	100.00	3,075	4.53	3.85	2.37	22.25	22.69	16.75	37.39	32.31	40.55	30.05	32.31	36.07	5.78	8.85	4.26
Total	**260**	**27,954**	**100.00**	**3,075**	**4.53**	**3.85**	**2.37**	**22.25**	**22.69**	**16.75**	**37.39**	**32.31**	**40.55**	**30.05**	**32.31**	**36.07**	**5.78**	**8.85**	**4.26**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "0" 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 **2024 - 2025**

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
Kenosha and Walworth Counties	260	27,954	100.00	3,075	85.52	50.00	58.47	4.42	25.00	10.06	25.00
Total	**260**	**27,954**	**100.00**	**3,075**	**85.52**	**50.00**	**58.47**	**4.42**	**25.00**	**10.06**	**25.00**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "0" data not available.
Due to rounding, totals may not equal 100.0%