

WEST TOWN BANK & TRUST
Community Reinvestment Act Strategic Plan
PROPOSED PLAN YEARS: 2022-2026

This is the Community Reinvestment Act Strategic Plan (“Strategic Plan” or “Plan”) adopted by West Town Bank & Trust (the “Bank”), an Illinois state bank that provides deposit and banking services insured by the Federal Deposit Insurance Corporation (“FDIC”). The Bank is the wholly owned subsidiary of Integrated Financial Holdings, Inc. (“IFH”) a North Carolina corporation and a Federal Reserve Board approved financial services holding company. The Bank is adopting this Strategic Plan in conformity with alternatives available to financial institutions under the Community Reinvestment Act of 1977 (“CRA” or the “Act”).

Certain Definitions: *Home mortgage loan* means a “home improvement loan,” “home purchase loan,” or a “refinancing” as defined in §1003.2 that appears in Regulation C - Home Mortgage Disclosure Act (HMDA)

Small business loan means a loan included in “loans to small businesses” as defined in the instructions for preparation of the Consolidated Report of Condition and Income.

I. INTRODUCTION: THE COMMUNITY REINVESTMENT ACT

Regulated financial institutions such as the Bank are required by law to demonstrate that they serve the financial services needs of the communities in which their offices are located, including adequately addressing both the deposit services and credit needs of the communities in which they are chartered to do business. This affirmative obligation to help meet the credit needs of the local communities served by each financial institution is the premise underlying the CRA, which was signed into law to address the deteriorating conditions of American cities - particularly lower-income and minority areas – and the perceived shortage of credit available to low- and moderate-income neighborhoods.

Community development is an important element of the CRA. Community Development encompasses: affordable housing for Low – or Moderate – Income (LMI) individuals or families; community services targeted to LMI individuals; activities that promote economic development by financing small businesses and farms; activities that revitalize or stabilize: Low – or Moderate – Income Geographies, distressed or underserved Non-Metropolitan Middle -Income Geographies or Designated Disaster Areas.

Financial regulators such as the FDIC review the CRA performance of banks operating in the United States and evaluate compliance with the Act utilizing criteria that varies with the size of the institution. Evaluation of performance for compliance with the material provisions of the CRA is typically reviewed in the bank-designated area (the “Assessment Area”) served by its full service banking offices, and measures such criteria as the bank's loan-to-deposit ratio, geographic distribution of loans, percentage of loans and lending activities in the Assessment Area, record of lending to borrowers of different income levels and businesses of different sizes, and responses to consumer complaints, as well as the Intermediate Small Bank Community Development Test Performance Standards.

Before the advent of developments such as online banking and access to credit from diversified financial services providers via the Internet, small banks like the Bank designated their Assessment Area based on the location of their full-service banking offices and limited their lending efforts to these, often small, geographic areas. In the 44 years since the CRA was adopted, however, technology and modern financial systems have enabled small banks, including the Bank, to expand their operations beyond the limited geographic reach of their traditional banking locations.

As discussed in more detail later in this Strategic Plan, the Bank has, in the past twelve years, developed a business strategy that focuses on making the Bank's commercial oriented Government Guaranteed Lending Department focused on Small Business Administration (“SBA”) 7(a) and 504 loans and United States Department of Agriculture (“USDA”) B&I/REAP/FSA/CF/WEP loans throughout the United States. The Bank also offers residential mortgage loan products available to individuals and families predominantly focused on the Mid-Atlantic area of the United States and exclusively sold into the secondary market. This nationwide lending strategy is driven by the business operations and expertise of the investment groups that recapitalized the Bank (outlined below), portfolio diversification goals, lending opportunities (including low- and moderate-income lending) outside of the communities served by the Bank's

retail banking facility, and the Bank's mortgage banking and government guaranteed lending operations that require lending volumes that exceed what can be originated in the Bank's primary Assessment Area of Cook County, Illinois alone. As an alternative to the standard evaluation method, and as a result of changes adopted by the Bank, the Act permits the Bank to comply with the CRA by electing to implement an approved CRA Strategic Plan. Accordingly, the Bank has elected to operate under this Strategic Plan in order to satisfactorily fulfill its CRA obligations.

II. WEST TOWN BANK & TRUST HISTORY AND BUSINESS OVERVIEW

MISSION STATEMENT

The Bank is dedicated to serving the financial needs of its customers and the communities in which its offices are located while exercising profitable stewardship over the resources of the Bank. The Bank is committed to providing personal banking services, affordable lending products in a sound, cost-effective way, assisting in making the dream of home ownership a reality for individuals and families, make loans available to small business and to contributing to the economic stability and growth of the neighborhoods in which the Bank does business.

This Mission Statement reflects the Bank's almost 100-year history of providing financial services to its local communities, and will continue to serve as the framework for the Bank's implementation of this Strategic Plan.

HISTORIC PRESENCE AND EXPANDED CAPABILITIES

On January 1, 1922, the Bank opened its doors with a mission to serve the banking needs of families in the Cicero, Illinois community. For most of its history, the Bank grew slowly by providing traditional savings and deposit services to the residents of Cicero and a number of surrounding towns. The Bank's lending programs focused on conventional mortgage loans, home equity lines of credit and second mortgages to residents in the local communities served by the Bank that required a minimum of a twenty (20%) percent down payment or significant equity in the property. In 1999, the Bank opened its North Riverside, Illinois branch to expand its service area, and continued its focus on providing traditional banking and residential mortgage loan products.

By 2009, the Bank had grown to \$60 million in assets – very small in comparison to most modern financial institutions. Rather than sell the Bank and have its offices become branches of a much larger regional or national bank, the Bank merged its operations with North Carolina investors that shared its same commitment to the promotion of home ownership and entrepreneurial activities of small businesses. From 2009-2010, the Bank and the investors completed a series of private placement stock offerings, which significantly increased the Bank's capital and has allowed for expansion of banking and lending operations.

Effective August 31, 2014 the Bank converted from an Illinois savings bank to an Illinois state bank and commenced operations through a de-novo branch in Winterville, NC and later in 2016 opened a second de-novo branch office in Edenton, NC.

On January 1, 2016 the Bank became a wholly owned subsidiary of West Town Bancorp, Inc., a North Carolina corporation, and a Federal Reserve Board approved bank holding company (who later became a Financial Services Holding Company and changed its name to Integrated Financial Holdings, Inc, in July of 2020).

On September 1, 2017 the Holding Company purchased Sound Bank, Morehead City, NC to create a multi-bank holding company. In 2018 the Bank sold its Winterville and Edenton, NC branch offices to Sound Bank and then in May of 2019 Sound Bank was divested from the Holding Company to a new group of investors through a recapitalization transaction.

As of September 30, 2021, the Bank's assets are \$409 million. The Bank has added modern banking services such as direct deposit, online banking, telephone banking, ATM and debit cards, and credit cards to its time-honored personal checking, savings and Certificate of Deposit offerings. Local business customers have also benefited from the Bank's addition of remote deposit capture, online banking, and merchant payment processing to the checking and deposit accounts traditionally available to neighborhood business and commercial customers. During this time, the Bank has remained dedicated to its core mission of providing personal and responsive service and banking products in a sound, cost-effective manner to enable the Bank's customers to achieve their personal financial objectives, home ownership goals and small business growth.

LENDING OPERATIONS, LOAN PROGRAMS AND PORTFOLIO COMPOSITION

The Bank has been able to expand its operations by developing the Bank's Mortgage Loan Department as a direct national residential lender and the Bank's mortgage loan services are now available to individuals and families throughout the United States. The growth in the Bank's ability to meet a diverse spectrum of home financing needs is founded upon the Bank's decision to offer more loan choices than the conventional twenty (20%) percent down payment / 20% equity products that were the hallmark of its historic operations. The Bank now offers a wide variety of lending programs to finance the purchase of a home or refinance an existing residential loan. These loan options can provide low cost and affordable entrance to and maintenance of home ownership and include the following:

- Federal Housing Administration (FHA) guaranteed loan programs;
- Veteran's Administration (VA) guaranteed loan programs;
- Conventional and insured low-down payment programs; and

While bigger banks primarily focus on larger customers, the Bank remains committed to meeting the banking and home ownership financing needs of individuals and families. The chart below summarizes the types and net value of loans held in the Bank's loan portfolio as of December 31, 2021:

1A2 - Other Construction	\$20,578	7.69%
1B – Farmland	\$853	0.32%
1C1 – Revolving open-end lines of credit 1-4 Family	\$1,867	0.70%
1C2A – First lien 1-4 family	\$27,790	10.39%
1C2B – Junior lien 1-4 family	\$23	0.00%
1D – Residential multifamily	\$6,847	2.56%

1E1 – Owner occupied CRE	\$67,597	25.27%
1E2 – Non-Owner occupied CRE	\$6,267	2.34%
3 – Agricultural loans	\$8,268	3.09%
4A- Commercial and industrial	\$127,314	47.60%
6C & 6D Consumer auto & other	\$74	0.00%

The Bank is also a provider of government guaranteed commercial loans through the SBA and USDA loan programs nationally. As a community bank, the Bank is dedicated to helping its customers realize, not only the American dream of home ownership, but to also facilitate small business ownership as the Bank believes this promotes neighborhood stability, strengthens local communities, and contributes to local economic growth in the areas that it serves.

III. REQUIRED ELEMENTS OF THE STRATEGIC PLAN

The Bank will take advantage of its existing residential lending expertise, small business lending products and financial services experience to meet the Bank’s obligations under CRA. The Bank’s business strategies are focused on its national lending activities, but the Bank’s CRA Strategic Plan concentrates on residential and small businesses lending programs and community involvement designed to support home ownership, housing opportunities and small business growth within its designated Assessment Area of Cook County, Illinois. In response to the Bank’s efforts to ascertain the credit needs of the communities that surround its traditional banking facility and as discussed in more detail below, comments and suggestions received by the Bank confirm that the current economic cycle due to COVID-19 has had a devastating effect on housing opportunities in the Bank’s traditional market area. Therefore, the Bank’s Strategic Plan was designed to increase the residential lending activities to LMI borrowers and in LMI census tracts in Chicago and the suburban communities of Cook County, Illinois area. Following is a discussion of elements of the Bank’s Strategic Plan.

DELINEATION OF ASSESSMENT AREA – COOK COUNTY, ILLINOIS

The Bank historically designated Cook and DuPage Counties in Illinois, which are part of the Chicago – Naperville – Elgin, Illinois Metropolitan Statistical Area (“MSA”), as the Bank’s Assessment Area that extended beyond the communities traditionally served by the Bank’s banking offices due to the intense competition in the communities of Cicero and North Riverside. With the adoption of a CRA Strategic Plan in 2012 and subsequent amendments and plan of 2017, the Bank identified an Assessment Area as Cook County, Il. and will do so again within this plan and as of September 30, 2021, there are 1,234 offices of 103 separate banking institutions providing banking and lending services in the Assessment Area.

COOK COUNTY, ILLINOIS

ASCERTAINING THE HOUSING CREDIT NEEDS OF THE BANK’S COOK COUNTY ASSESSMENT AREA

In order to fulfill the Bank’s affirmative obligation to help meet the credit needs of the local communities in Cook County, Illinois to be served by the Bank, particularly in low- and moderate-income area, representatives of the Bank contacted municipal officials and housing and

social service providers throughout the Assessment Area with emphasis on outreach efforts in the Cicero, Berwyn and North Riverside communities. As a result of the Bank's discussions with municipal leaders and organizations active in these communities, the Bank determined that the recent economic climate due to COVID-19 has had an impact on housing gains made over the last ten years.

The economic picture for the Assessment Area is slowly improving, with small gains in the Cook County employment rates seen in recent months. Although the Assessment Area is now climbing out of the shutdown, Cook County continues to struggle with high rates of unemployment and typically high foreclosure rates although the foreclosures moratorium has stopped this process for the last few years.

Local communities' determination that housing credit and home ownership support is needed in the Assessment Area served by the Bank is confirmed by State of Illinois and Cook County officials, who have joined with Assessment Area cities and towns to address the housing crisis.

This Strategic Plan recognizes affordable housing credit and home ownership support is needed throughout the Assessment Area and is designed to address those needs.

RECENT MARKET CONDITIONS

According to Realtor.com, Cook County median home prices in 2021 rose 6.9% compared to last year, selling for a median price of \$285K. In December 2021 homes in Cook County sold after 63 days on the market compared to 67 days in December 2020. In December 2021 the median home sales price was \$285,000 compared to \$265,000 in December 2020. The trend for median days on market in Cook County, IL in 2021 fluctuated between 75 days on the market in January 2021 to 63 days on the market in December 2021. Cook County, IL is a balanced market, which means that the supply and demand of homes are about the same. Cook County is also a neutral housing market, which means prices tend to be reasonable and homes stay on the market for a typical length of time.

PUBLIC PARTICIPATION AND COMMUNITY OUTREACH ACTIVITIES USED IN DEVELOPMENT OF THE STRATEGIC PLAN

The Bank has invited community contacts to participate in the development of the Bank's Strategic Plan by providing insight into the local community and its needs, particularly with respect to:

- affordable housing;
- community services;
- economic development; and
- the revitalization or stabilization of low- to moderate-income areas within the Bank's Assessment Area.

The Bank also has solicited input from entities, organizations, government agencies and other community development groups by participating in various outreach activities within the targeted local communities. The Bank has used the information obtained through public participation and its own community outreach activities to assess the credit needs of the Assessment Area and to assist the Bank in the development of this Strategic Plan. The Bank has focused outreach activities on entities, organizations, and government agencies within the targeted communities of the Assessment Area that offer innovative, flexible programs designed to meet the housing, medical, and family support needs of low- and moderate-income families and individuals residing in the Assessment Area. The following represents a few of the Bank's local community outreach participation efforts:

- **OPERATION HOPE.** The Mission of Operation HOPE is to expand economic opportunity in underserved communities through economic education and empowerment. Operation HOPE improves the economic quality of life for individuals, families, and communities through programs that create stakeholders; converting check cashing customers into banking customers, renters into homeowners, small business dreamers into small business owners, and minimum wage workers into living wage workers.

The Bank is a member of Operation HOPE and participates in the Banking on Our Future ("BOOF") Program which executes a global delivery system for financial education to youth ages 9-18 at no cost to school districts with a focus on low-wealth communities. Representatives of the Bank participate in this BOOF Program, both in classroom and virtually.

- **JUNIOR ACHIEVEMENT.** Junior Achievement is the world's largest organization dedicated to inspiring and preparing young people to succeed in a global economy. Representatives of the Bank participate in the Junior Achievement in both in classroom and virtual programs where volunteers from the Bank present Junior Achievement curriculum to assist students who participate in the Junior Achievement program in understanding more about personal financing and budgeting.
- **NEIGHBORHOOD HOUSING SERVICES OF CHICAGO. COMMUNITY BANKS PARTNERSHIP.** NHS Community Banks Partnership is a group of banking organizations committed to investing in neighborhood revitalization, affordable housing and community reinvestment. For 45 years, NHS has served Chicago and the South suburbs focusing their work in communities of color. They work with residents, families, community and corporate partners to:
 - Revitalize disinvested communities;
 - Develop affordable housing on the South and West sides of the city;
 - Educate buyers and long-term homeowners on how to reduce housing costs;
 - Fight institutional racism defined by redlining practices and disinvestment in underserved neighborhoods.

The efforts undertaken prior to and as this Strategic Plan was being formulated have exposed the extent and scope of the housing credit support and economic redevelopment efforts that are currently required to renew residential home ownership opportunities in the Bank's Assessment Area. Moreover, the Bank's meetings with municipal and nonprofit leaders have revealed that need for assistance to children and families in crisis, access to health care, and housing safety and security concerns are present in the low- and moderate-income neighborhoods included in the Bank's Assessment Area. The Bank's Strategic Plan will seek to address these issues.

The Bank understands, however, that the credit and housing support needs of the Assessment Area will not remain static during the next five years and changing economic conditions will present future opportunities for the Bank to meet the housing credit, community improvement and quality of life concerns of the low- and moderate-income communities of the Assessment Area. Although the Bank is limited by its relatively small size, the Bank's community outreach activities are ongoing and will continue through the life of this Strategic Plan so the Bank may continue to identify investment, grant and service opportunities, in addition to the residential lending services it will provide, to enhance economic opportunities and quality of life improvement for low- and moderate-income residents of the Assessment Area.

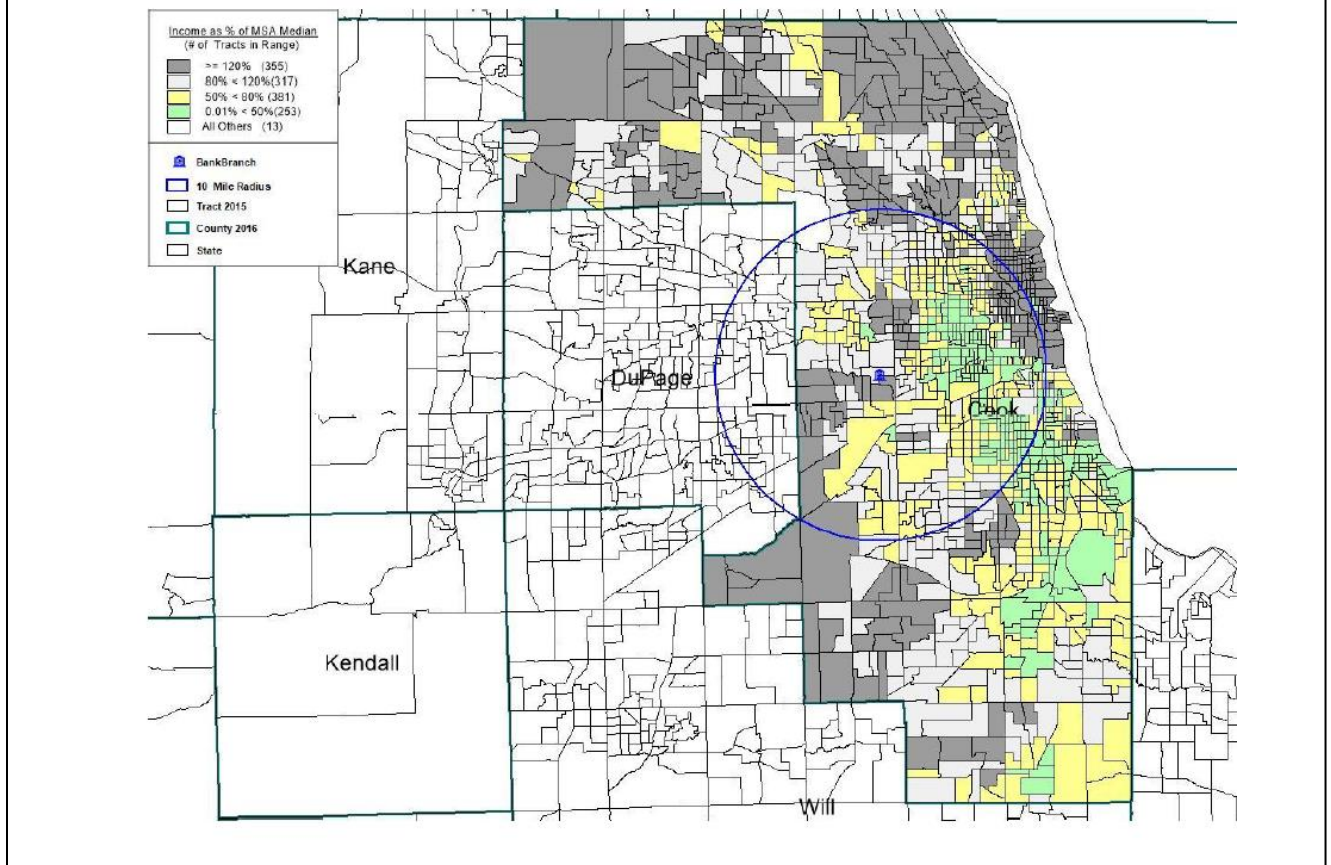
OVERVIEW OF CHARACTERISTICS AND DEMOGRAPHICS OF THE COOK COUNTY ASSESSMENT AREA

Data regarding the population, income levels and housing stock of the Bank's Cook County Assessment Area is compiled and published by the United States Census Bureau. Information is organized in a variety of geographic formats, such as by state, MSA and county level, with the most detailed information provided in small, relatively permanent statistical subdivisions of each MSA known as *census tracts*. The U.S. Census Bureau also provides population and housing information in demographic groupings, such as age and race, and home ownership and rental categories. Because this Strategic Plan reflects the Bank's commitment to fulfilling the housing credit needs of the Assessment Area served by the Bank, especially low- and moderate-income ("LMI") individuals and households (defined as individuals and households with incomes less than 80% of the area median income), statistical data disclosing economic information about the Assessment Area is of particular importance to the Bank's efforts to identify areas in which target populations reside.

Population data released from the 2015 U.S. Census indicates that more than 9,500,000 individuals reside in the Chicago – Naperville – Joliet, Illinois MSA, which covers more than 7,200 square miles. Of these, approximately 5,236,000 live in Cook County, which covers more than 945 square miles (*ACS Data Source: 2015 US Census*). A list of census tracts included in the Assessment Area is attached as Exhibit "1" to this Strategic Plan, and an overview of the Bank's Assessment Area is presented below:

DELINEATED ASSESSMENT AREA

West Town Bank & Trust – Cook County, IL - Branch Radius Map



As the overview of the Assessment Area census tracts indicates, significant differences in income levels are present within Cook County. The Assessment Area map is based on the weighted average median family income level for the Chicago – Naperville – Joliet, Illinois MSA that, for 2021, was estimated at \$75,557 (PCI Corporation, Inc. ACS (American Community Survey) - Data Source: 2015 US Census). For Cook County alone, for the period 2021 (PCI Corporation, Inc. ACS - Data Source: 2020 US Census), the per capita median income was stated at \$39,239. Under the CRA, the census tracts are classified according to income codes defined as “upper-”, “middle-”, “moderate-” and “low-income”. Census tract classifications are important for evaluation of the Bank’s CRA performance because the purpose of the Act is to spur revitalization of low and moderate-income areas. In determining the income qualification for low-income (indicated in green on the Assessment Area map), the CRA regulations define low-income as less than 50 percent of the area median family income, and moderate-income (indicated in yellow on the Assessment Area map) as income that is at least 50 percent but less than 80 percent of the area median family income. Data collected and compiled by the U.S. Census Bureau uses the same income qualification and terminology as that found in the CRA Regulations.

Population of the Cook County Assessment Area

The Bank's Strategic Plan targets the LMI population residing in the Bank's Assessment Area and is designed to promote housing related lending and home ownership support for these households. The income demographic information provided in the Assessment Area map is presented in a more detailed fashion, which will be used by the Bank in its outreach efforts, below:

DEMOGRAPHIC DETAIL – ASSESSMENT AREA – COOK COUNTY

(PCI Corporation, Inc. ACS - Data Source: 2015 US Census)

Tract Categories	Census Tracts		Total Population	
	#	%	#	%
Low Income	253	19.18	758,641	14.49
Moderate Income	381	28.89	1,564,757	29.88
Middle Income	317	24.03	1,411,949	26.96
Upper Income	355	26.91	1,480,751	28.28
NA	13	0.99	20,295	0.39
Total	1,319	100.00	5,236,393	100.00

Based on the 2015 Census estimates, 2,323,398 individuals, or 44.37% of the population of the Assessment Area, consist of LMI individuals who reside in a total of 634 census tracts in the Assessment Area. Low-income census tracts represent over 19% of the total Assessment Area, where more than 750,000 individuals reside. The Assessment Area's 381 moderate-income census tracts comprise almost 29% of all Cook County census tracts, with over 1.5 million inhabitants representing ample lending and investment opportunity for both residential and small business support activities. Combined, LMI individuals represent the largest demographic group in the Assessment Area.

FAMILIES AND HOUSEHOLDS IN THE COOK COUNTY ASSESSMENT AREA

For statistical purposes, the U.S. Census Bureau collects and compiles data relevant to the Bank's Strategic Plan based on *households* in a particular census tract. As used throughout this Strategic Plan, a household consists of all the people who occupy a *housing unit*, defined as a house, an apartment or other group of *householder* (defined as the person or persons in whose name the housing unit is owned or rented or, if there is no such person, any adult member) and all other people in the housing unit who are rooms, or a single room, when it is occupied or intended for occupancy as separate living quarters. Households may be comprised of people unrelated by birth, marriage, or adoption who reside together (including roommates and foster children), or be occupied by the members of a family who share a housing unit. A *family* includes an individual characterized as those related to the householder by birth, marriage, or adoption. The following details the number of households in the Assessment Area, as well as the number of households comprised of families.

HOUSEHOLDS AND FAMILIES – ASSESSMENT AREA – COOK COUNTY

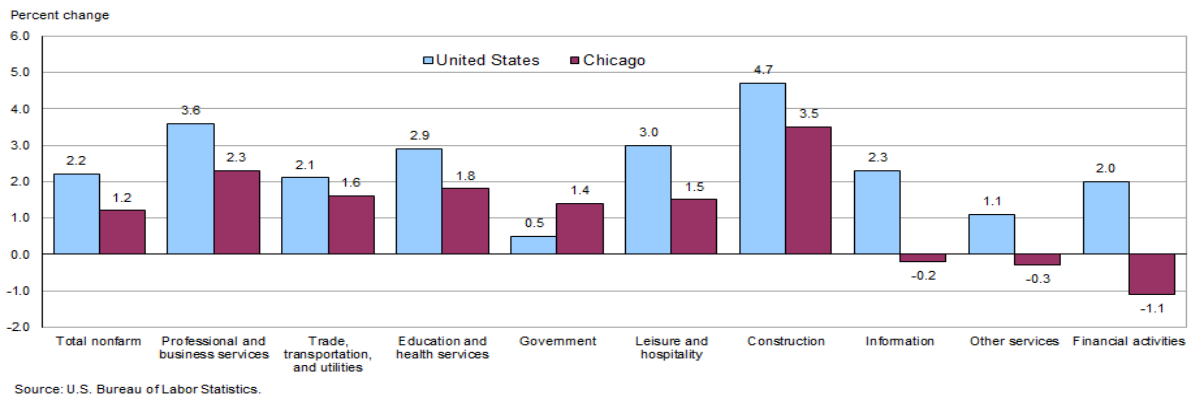
(PCI Corporation, Inc. ACS - Data Source: 2015 US Census)

<u>Total Households</u>	<u>Households that are Families</u>
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Tract Categories	#	%	#	%
Low Income	250,150	12.87	158,599	13.39
Moderate Income	536,204	27.60	340,191	28.71
Middle Income	528,786	27.22	336,303	28.38
Upper Income	618,007	31.81	346,612	29.25
NA	9,812	0.51	3,152	0.27
Total	1,942,959	100.00	1,184,857	100.00

According to the U.S. Bureau of Labor Statistics, total nonfarm employment in the Chicago- Elgin-Naperville, Ill.-Ind.-Wis. Metropolitan Statistical Area stood at 4,582,900 in May 2015, up 56,500 or 1.2 percent over the year. During the same period, the national job counts increased 2.2 percent. Regional Commissioner Charlene Peiffer noted that the Chicago metropolitan area has had over-the-year employment increases each month since October 2010.

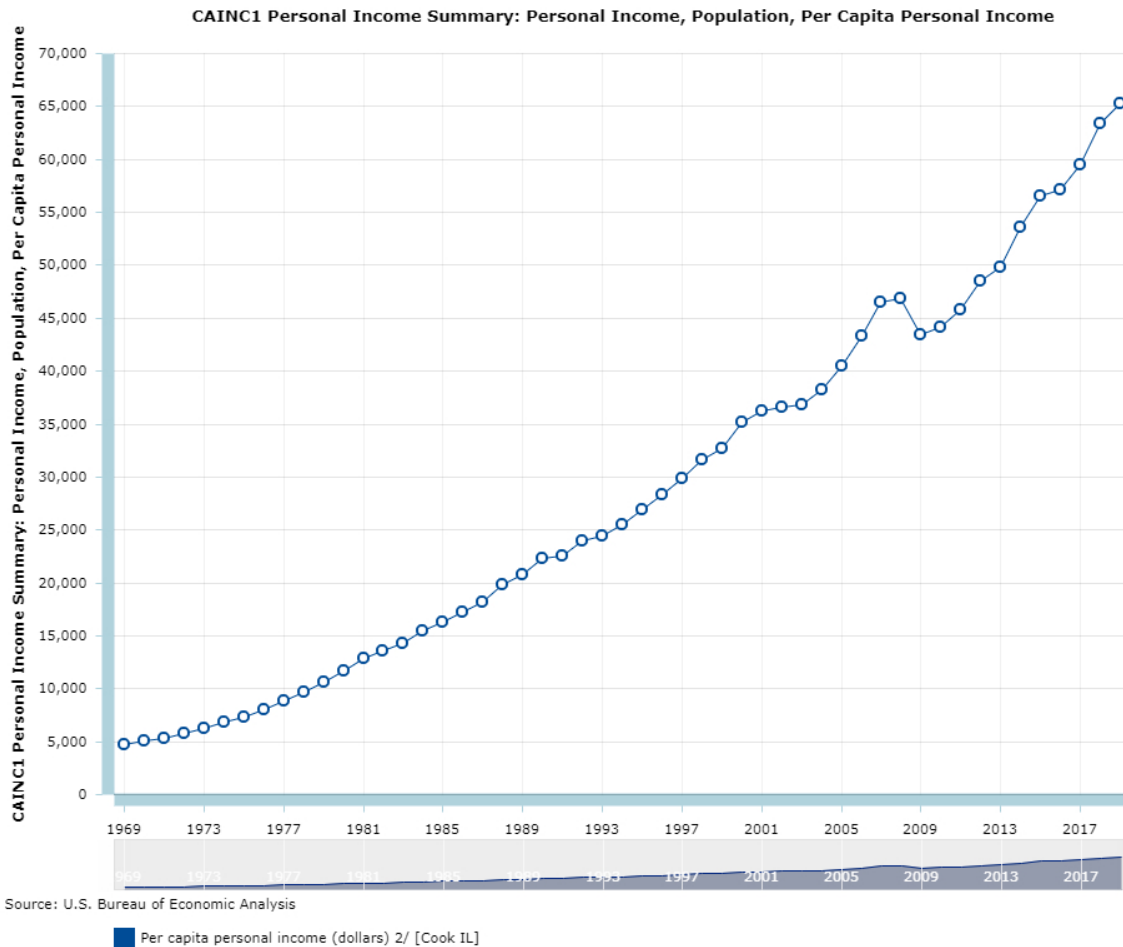
Chart 2. Total nonfarm and selected industry supersector employment, over-the-year percent change, United States and the Chicago metropolitan area, May 2015



INCOME DEMOGRAPHICS OF THE COOK COUNTY ASSESSMENT AREA

The Bureau of Labor statistics reported that as of fourth quarter of 2020 Cook County had over 2,300,000 workers who received an average weekly wage of \$1,571, including workers receiving benefits under both State and Federal unemployment compensation programs (*Bureau of Labor Statistics*). The average national weekly wage during this time period was \$1,339

Total per capita personal income, as presented in the graph below, was noted at \$65,306 for individuals residing in the Cook County, IL. in 2019, an all-time high but was immediately prior to the start of the most recent economic recession due to COVID-19 (*Source: US Department of Commerce Bureau of Economic Analysis*).



Loan programs the Bank will offer within LMI census tracts of the Assessment Area will include (but will not be limited to) originating FHA Streamline and VA Interest Rate Reduction Refinance Loans which do not require income verification, but benefit LMI households and the families of veterans who have served the nation.

IV. WEST TOWN BANK & TRUST'S STRATEGIC PLAN

Many public and private programs have sought to reduce barriers to home ownership for American families and individuals. Would-be homeowners can be prevented from buying a home for a variety of reasons, such as lack of cash or other financial assets for the down payment and closing costs, poor credit history, insufficient income to make the mortgage payments, and other debt payments that reduce the amount of income available for the mortgage payment. The Bank believes the most effective way to increase home ownership opportunities in the Bank's Assessment Area is to provide loans that require a lower down payment for home purchase and to assist, where possible, in securing down payment assistance to home buyers. Other ways in which the Bank can assist potential homebuyers include financial literacy programs, home-purchase education and counseling services, encouragement of community development activities, and participation in community support service activities.

In addition to home ownership, the Bank also believes in the importance of small businesses to the economic growth of its Assessment Area. Small businesses are the backbone of our economy and make up a sizeable portion of the commercial business environment in the Bank's Assessment Area. The success of small businesses is vital to the stabilization and growth of our neighborhoods, particularly low- and moderate-income neighborhoods. The Bank can promote economic development by financing businesses that stabilize neighborhoods, including those small businesses that meet the eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs or that have gross annual revenues of \$1 million or less. The Bank will continue to utilize its commercial loan authorities and Small Business Administration loan programs to facilitate and/or join in larger community development credit facilities benefiting LMI individuals in the Assessment Area if opportunities should arise during the term of this Strategic Plan. The CRA regulations require banks like West Town to set forth their Strategic Plan utilizing measurable criteria so that performance can be measured in the Assessment Area of lending activities, community investments and grants, and community support service achievement over the stated life of the Strategic Plan. The Bank has designed its Strategic Plan for a five-year period and has established standards for Satisfactory performance for each year of the Plan. The Bank's Board of Directors has set a goal of meeting or exceeding the Satisfactory performance goals outlined in this Strategic Plan for the time period covered by the Plan. The Board believes that in meeting the goals set forth in this Plan, it will contribute to meet the credit needs and quality of life of the communities within its Assessment Area in a meaningful way.

The CRA regulation requires a bank formulating a Strategic Plan to establish measurable goals for evaluating its performance in meeting the CRA needs of the Bank's Assessment Area, including the needs of low and moderate income areas and based on borrower profile through lending, community development investments and grants and community development services. The Bank has identified 81 banks in its Cook County Assessment Area which indicated deposits within the Assessment Area per the "Deposit Market Share report as of June 30, 2021." Not all of the banks are similarly situated to the Bank in size (assets), number of in market branches and number of employees. The Bank analyzed all of the "peers" using data from 9 for residential lending, 8 for small business lending and 19 for investment activities and believes this to be all of the reported data for the period under review. The Bank has developed a scoring system, which will be explained in greater detail later in this Plan, to rate its achievement of goals in meeting the CRA needs of the Bank's Assessment Area during the term of this Strategic Plan.

LENDING GOALS AND MEASUREMENT STANDARDS

The Bank has established the following seven goals for each Assessment Area ("AA") for consideration in assessing its performance under this Strategic Plan:

1. Purchase and origination of home mortgages in low-income tracts;
2. Purchase and origination of home mortgages in moderate-income tracts;
3. Purchase and origination of small business loans in low-income tracts;
4. Purchase and origination of small business loans in moderate-income tracts;
5. Purchase and origination of home mortgages to low-income borrowers;
6. Purchase and origination of home mortgages to moderate-income borrowers;

7. Purchase and origination of small business loans to businesses with gross annual revenue of \$1 million or below.

Under the Bank's scoring system, specific achievements for each CRA criteria translate into a numeric score for those criteria. The Bank may earn points in each of the above lending goals based upon its achievements in each category. In developing the scoring system for evaluating the Bank's CRA lending performance, the Bank has analyzed its own historic lending activities from 2017 through 2020. The Bank analyzed all of the "peers" using data from 9 for residential lending and 8 for small business lending activities. The Bank has reviewed such lending activities both with respect to the geographic distribution of lending activity within each Assessment Area and with respect to borrower profile. In developing its Strategic Plan, the Bank has developed lending goals for each of the seven lending categories listed above. Under the Strategic Plan and the scoring system set forth below, the Bank will successfully meet its CRA lending goals by either originating or purchasing loans meeting one or more of the seven outlined goals in its Assessment Area. The Bank will receive credit toward its CRA lending goals for loans originated by the Bank even if such loans are subsequently sold after their origination but will require a "hold period" for purchased loans to receive credit as described in more detail later in this plan. The Bank, its Board and Management are dedicated to enhancing its CRA lending and are of the opinion that the purchase or origination of loans to small businesses, LMI borrowers or loans made in LMI Census Tracts and the subsequent sale of those loans can be viewed favorably from a safety soundness basis. The maintenance of sound interest rate risk management and liquidity practices in effect increases the amount of funding available to such CRA loans and borrowers and ensures on-going access to funding not only to the Bank, but to the other financial institutions who sell the loans to the Bank. Without a fluid secondary market to sell loans, particularly loans with fixed rate terms of five (5) years or more lending of this nature would cease to exist due to the risk to capital based on elevated interest rate risk and liquidity risk. In general, the opposite is true that by having a fluid secondary market, lenders can effectively manage their interest rate risk position in either a rising rate or falling rate environment as well as manage liquidity needs without tying up valuable funding in long maturity loans such as a thirty (30) year fixed rate mortgage. Being a small community bank loan repricing duration is a critical part of interest rate risk management and is paramount to preserve capital in any rate environment and with a limited balance sheet the Bank is restricted on the amount it can fund and hold with repricing terms of five (5) years or more. Quasi government agencies such as Freddie Mac and Fannie Mae were developed specifically to take the risk of longer-term fixed rate products off of Banks' balance sheet and develop a strong secondary market to facilitate the sale of such products.

Accordingly, it is the Bank's philosophy, in most cases, to sell loans shortly after their origination but with particular emphasis on selling of loans with repricing terms of five (5) years or more. The CRA Act was enacted by Congress in 1977 with the intention of encouraging depository institutions to help meet the credit needs of surrounding communities (particularly low- and moderate-income neighborhoods). Access to credit is the basis and focus of the act. A Bank can only originate, purchase or acquire assets to the extent that its capital can support while maintaining safe and sound financial and credit practices.

The Bank will commit to holding loans and investments purchased or self-originated for a period of 6 months to qualify for credit for either lending or investment goals in the plan. In an

effort to define the hold period for loans; the Bank may purchase a loan in the latter part of a plan year (i.e., October) that would not have the opportunity to season on the Bank's balance sheet for six months but the Bank will get credit for this loan as if it had been held for six months in the year it was purchased. As way of example if the Bank purchases a qualified CRA loan in October of 2021 and sells it in April of 2022 it would receive credit towards the 2021 lending goal. If the loan is sold before April of 2022 it would not receive any credit. The hold period for an investment is defined in the investment goal section of this plan below. The only exception to this rule is if a loan or security pay's off during the six months hold period not as a result of the Bank's involvement.

In analyzing the Bank's required lending activities under this Strategic Plan, the Bank has analyzed the available lending data of other similarly situated banks in its Assessment Area. The Bank believes that this peer group accurately reflects the CRA activities of comparable institutions within the Bank's area of operation.

See Exhibit 2 is the Peer Bank List and Exhibit 3, 4 and 5 attached hereto for a Summary of Bank Peer Group Institutions for Assessment Area with regard to lending and investment activities. See Exhibit 6 hereto for a Summary of the Bank's historical performance:

V. SCORING FOR THE BANK'S LENDING, INVESTMENT AND SERVICE GOALS

The following color coded table shows the range of possible points the Bank can earn and the points necessary to achieve Satisfactory and Outstanding scores: This table applies to all CRA goals set forth below (also see Exhibit 7).

Scale	Min	Max
Outstanding	9	11
Satisfactory	6	8
Needs to Improve	3	5
Substantial Noncompliance	0	2

LENDING GOALS FOR COOK COUNTY ASSESSMENT AREA

The Bank's lending goals for its Cook County Assessment Area are shown below but defined as a percentage of banks assets as measured by the immediately preceding year-end asset size of the bank (also see Exhibit 8):

Cook County AA Lending Goals - Exhibit 8										
Residential Lending Goals	Percentage of Assets									
Points	1	3	4	5	6	7	8	9	10	11
P&O of home mortgages in low-income tracts	0.195%	0.330%	0.465%	0.600%	0.735%	0.870%	1.005%	1.140%	1.275%	1.410%
P&O of home mortgages in Moderate-income tracts	0.655%	1.110%	1.565%	2.020%	2.475%	2.930%	3.385%	3.840%	4.295%	4.750%
P&O of home loans to low-income borrowers	0.070%	0.130%	0.190%	0.250%	0.310%	0.370%	0.430%	0.490%	0.550%	0.610%
P&O of home loans to Moderate-income borrowers	0.215%	0.420%	0.625%	0.830%	1.035%	1.240%	1.445%	1.650%	1.855%	2.060%
Total					4.555%			7.120%		
Percentage of Assets										
	Peer Average	Peer Well Above Average	West Town Bank & Trust							
Low-income tracts	0.60%	1.14%	0.86%							
Moderate-income tracts	2.02%	3.84%	1.62%							
Low-income borrowers	0.25%	0.49%	0.35%							
Moderate-income borrowers	0.83%	1.65%	0.92%							
	3.70%	7.12%	3.75%							
Small Business Lending Goals	Percentage of Assets									
Points	1	3	4	5	6	7	8	9	10	11
P&O Small Bus Loans Low-income tracts	0.036%	0.059%	0.081%	0.1030%	0.125%	0.148%	0.170%	0.1920%	0.214%	0.237%
P&O Small Bus Loans Moderate-income tracts	0.098%	0.159%	0.220%	0.2810%	0.342%	0.403%	0.464%	0.5250%	0.586%	0.647%
P&O Loans to Small Business <\$1mm Annual Revenue	0.097%	0.133%	0.169%	0.2050%	0.241%	0.277%	0.313%	0.3490%	0.385%	0.421%
Total					0.708%			1.066%		
Percentage of Assets										
	Peer Average	Peer Well Above Average	West Town Bank & Trust							
Low-income tracts	0.103%	0.192%	0.040%							
Moderate-income tracts	0.281%	0.525%	0.070%							
Loans to Small Business <\$1mm Annual Revenue	0.205%	0.349%	0.210%							
	0.589%	1.066%	0.320%							

The Bank will receive a score for its lending activity in each of the seven categories shown above in its Assessment Area. For example, in order to achieve a “Satisfactory” score for Purchase and Origination of home mortgages in low-income tracts in the Cook County Assessment Area, the Bank would have to purchase or originate at least 0.735% of its total assets in a low-income tract in order to earn 6 points, the minimum score for a “Satisfactory” score (green highlighted scores). To achieve an “Outstanding” score (blue highlighted scores) in this category, the Bank would need to purchase or originate at least 1.140% of total assets in a low-income tract. The Bank arrived at its mean Satisfactory percentage by considering, Peer Average performance for lending in each category and then analyzing in-market resources (branches and employees) as compared to peers and its own historical performance. “Peer Average” is reflected as a grade of “5” which represents an “Unsatisfactory” grading and then increasing symmetrically to “Peer Well Above Average” which is defined as one standard deviation above average as noted in the “Peer Analysis”. So, in this example, the 1.140% needed for an “Outstanding” score is more than one standard deviation above 0.600%, which is average among our peers for this category. The Bank believes these goals to be very aggressive but will dedicate resources as required to meet these goals.

For Small Business Lending goals in its Cook County Assessment Area in order to achieve a “Satisfactory” score for Purchase and Origination of Loans to Small Business in low-income census tracts, the Bank would have to purchase or originate 0.125% of total assets for Loans to Small Businesses. To achieve an “Outstanding” score in this category, the Bank would have to purchase or originate 0.192% of total assets. Again, the Bank believes these goals to be very aggressive but will dedicate the required resources to meet its goals and the scoring system is identical to the residential lending goals with a score of “6” to “8” representing a satisfactory score and a score of “9” to “11” representing an outstanding score.

To complete the scoring process for the Bank's lending goals you must first compute the score in each category within the Assessment Area. The average score for each of the four residential categories weighted at 75% of lending goals (or 45% of total goal) and the average score for each of the three small business categories weighted at 25% of lending goal (or 15% of total goal) will determine the score for lending in the Bank's Assessment Area.

Here is an example of scoring for the Assessment Area lending goals (also see Exhibit 8):

Cook County												
Grading Example	Residential Lending											
Points	1	3	4	5	6	7	8	9	10	11		
P&O of home mortgages in low-income tracts				0.650%								
P&O of home mortgages in Moderate-income tracts		1.167%										
P&O of home loans to low-income borrowers											0.866%	
P&O of home loans to Moderate-income borrowers					1.118%							
	0	3	0	5	6	0	0	0	0	0	11	
											Total Residential	25
											Average	6.25
											Weighted Total (75%)	4.69
	1	3	4	5	6	7	8	9	10	11		
P&O Small Bus Loans Low-income tracts							0.171%					
P&O Small Bus Loans Moderate-income tracts					0.366%							
P&O Loans to Small Business <\$1mm Annual Revenue							0.322%					
Calculated Points	0	0	0	0	6	0	16	0	0	0	0	
											Total Small Business	22
											Average	7.33
											Weighted Total (25%)	1.83
											Total Lending	6.52

INVESTMENT AND GRANT GOALS AND MEASUREMENT STANDARDS

As a small banking institution with \$412 million in assets and a loan portfolio and investment portfolio of \$288 million and \$20.6 million respectively on December 31, 2021, the Bank has limited resources that it may annually commit to investments and charitable gifts unrelated to its primary business operations. Nevertheless, the Bank understands that CRA-related investments and grants provide support for the efforts of local social service organizations and non-profit agencies active in the Assessment Area. In fact, in the current economic environment, many of these organizations and agencies depend on private investment funds and charitable gifts to execute critical programs that improve the lives of residents in the local communities served by the Bank, particularly LMI individuals, and help build stronger neighborhoods. The Bank has decided not to engage in community development lending in the traditional sense due to the same rationale that drove its decision to adopt a CRA Strategic Plan back in 2012. The Bank's business model focuses on governmental guaranteed lending programs, such as SBA and USDA, throughout the continental United States. The Bank has limited resources and expertise in its assessment area with only one loan officer in its North Riverside office to adequately pursue community development lending and lending in general. Historically the Bank has purchased loans to fulfill its CRA lending requirements and purchased investment securities at heightened levels to achieve an "Outstanding" score in the Investment category to compensate for its lack of lending abilities and to be ranked Satisfactory overall for CRA purposes. Since the Bank lacks the resources and expertise to achieve a sustainable performance level in lending, including community development lending, Bank management has chosen the alternative of having heightened community development investment goals that are consistent with past practices to achieve an overall satisfactory CRA rating.

The Bank may make investments that support LMI housing opportunities, the safety and security of LMI neighborhoods and dwellings, and contribute to the economic development of LMI census tracts within the Assessment Area. Likewise, the Bank may make contributions or provide funding to community-based housing, advocacy and social services groups dedicated to improvement of the lives of LMI individuals residing in low- and moderate-income census tracts of the Bank's service area. The Bank will acquire CRA-qualified investments and/or providing grant funds (or assets with verifiable third-party values) within the Assessment Area and will adjust the level of investments and grants to housing-related service and charitable organizations during each of the five years of the Strategic Plan as a result of changes in asset size of the bank.

In determining to make CRA-qualified investments during the term of this Strategic Plan, the Bank will seek to support flexible and innovative organizations and proposals designed to meet the rental, rehabilitation and transitional housing and family support needs of low- and moderate-income families and individuals residing in the Assessment Area. Similarly, in determining to provide grant funds or other Bank assets to provide assistance to worthy non-for-profit and charitable groups, the Bank will seek to identify nonprofit and community based activities that support children and families in crisis, facilitate access to health care, offer training and economic improvement opportunities, and address housing safety and security concerns that are present in the low-income and moderate-income neighborhoods included in the Bank's Assessment Area.

As with LMI lending, the Bank's investments in organizations benefiting LMI individuals or providing services in LMI census tracts may be resold and still qualify for investments and grants benefiting LMI individuals or LMI census tracts under this Strategic Plan. Thus, awards of "points" for reaching higher levels of new CRA-qualified investments and grants the Bank may make for community development purposes, will include but not be limited to those grants and investments as defined under the regulation. The Bank has set goals and will receive points under this Strategic Plan towards its "New" investment goals for a qualified investment that is newly purchased during the corresponding Plan year and resides on its balance sheet for a minimum of a six-month period. To encourage long-term investments, the Bank has also set goals and will receive points under this Strategic Plan towards its "Cumulative" investment goals for qualified investments that are maintained throughout the corresponding Plan year – regardless of whether the investments are new or originated in prior calendar years. The Bank's "Cumulative" goal will be calculated by adding all of the qualified investments maintained on the bank's books at the end of each calendar quarter and averaging this figure across all four quarters of the corresponding Plan year. As with the "New" goals, the Bank will receive points under this Strategic Plan towards its "Cumulative" investment goals for an investment that resides on its balance sheet for at least a six-month period. It is important to note that the investment calculated in arriving at the New and Cumulative goals are not mutually exclusive, as new investments can be counted towards the Cumulative goals to the extent that an outstanding balance is maintained at the end of any calendar quarters. Both the New and Cumulative investment goals for a corresponding Plan year will be calculated relative to the bank's total assets as of December 31 of the prior calendar year.

As a point of clarity the Bank may purchase an investment in the latter part of a plan year (i.e., October) that would not have the opportunity to season on the Bank's balance sheet for six

months but will get credit for these investments if held for six months that is inclusive of the subsequent year. By way of example if the Bank purchases a qualified CRA investment in October of 2022 and sells it in October of 2023 it would receive credit as a New and investment in 2022 and any outstanding balances at the end of 4Q2022, 1Q2023, 2Q2023, and 3Q2023 would be considered in the Cumulative investment goals calculation for 2022 and 2023. If the investment is sold before that same date in April of 2023, it would receive no credit as a New and Cumulative investment in either year.

The points earned by the Bank for its CRA investment activities are part of those that will be used to determine if the Bank's performance under this Strategic Plan is "Satisfactory" or "Outstanding".

For its Assessment Area, the Bank has established its goals for new and existing CRA-qualified investments and grants based upon the Bank's analysis of community development investments and grants made by the Bank's peer group. The Bank's peer group for investments and grants consists of 19 banks that have undergone CRA examinations in 2019- 2021 and are of an asset size that requires them to report CRA investments. The investment data from this peer group was obtained from the CRA Performance Evaluations of each peer bank and can be found as Exhibit "6" hereto. The Bank believes these goals to be aggressive and can be illustrated by having a goal for New investments equal to "Peer Well Above Average" which is one standard deviation above the "Peer Average" results and inline with the Bank's historical average results, but again the Bank typically performs at a higher level than peers to compensate for its lack of lending expertise and resources. The "Satisfactory" grade for Cumulative investments is two times that of New investments as peer figures are not available for this category but meets the "rule of thumb", while the "Outstanding" grading for Cumulative investments is based on the Bank's historical results as outlined below but is again at elevated levels by over investing based on the "Satisfactory" requirements and typically receives an "Outstanding" grade due to compensation for lack of lending activity.

The Bank's Investment and Grant goals for its Assessment Area are shown below (also see Exhibit 9) using the year-end total assets from the prior calendar year:

Investment Goals - Exhibit 9										
Investment Goals										
Cook County										
Points	1	3	4	5	6	7	8	9	10	11
New Investments	0.238%	0.344%	0.451%	0.644%	0.836%	0.895%	0.953%	1.070%	1.129%	1.187%
Cumulative Investment	0.476%	0.689%	0.902%	1.287%	1.672%	1.789%	1.906%	2.140%	2.257%	2.374%
Total					2.508%			3.210%		
Percentage of Assets										
Peer										
Peer Well										
Average										
Above Average										
New										
Cumulative										
New Investment (for peer only)			0.451%	0.836%	0.790%	2.140%				

Once again, the Bank is committed to enhancing its performance as compared to historical performance to demonstrate its' commitment to the spirit and letter of the CRA regulation. Below is the Bank's historical performance which shows the results of New and Cumulative investment, and they are not mutually exclusive:

WTBT Historical Performance				2017	2018	2019	2020	Avg
CRA New Investments				2,859	2,770	1,748	2,274	2412.7
CRA Cumulative Investment				4,507	6,610	6,875	7,295	6321.7
Total Assets				336,342	261,330	279,080	357,896	
New Investment as % of Total Assets				0.85%	0.82%	0.67%	0.81%	0.79%
Cumulative Investment as % of Total Assets				1.34%	1.97%	2.63%	2.61%	2.14%
							Total	2.93%

To complete the scoring process for the bank investment goals you must first compute the score in each category within its Assessment Area. The average score for each of the two categories will determine the score for the Assessment Area.

Here is an example (also see Exhibit 9):

Cook County										
Grading Example										
Points	1	3	4	5	6	7	8	9	10	11
New Investments						0.902%				
Cumulative Investment										2.447%
Calculated Points	0.00	0.00	0.00	0.00	0.00	7.00	0.00	0.00	0.00	11.00
									Sum	18.00
									Average	9.00

SERVICE GOALS AND MEASUREMENT STANDARDS

The Bank recognizes that community banks have an opportunity to fulfill a unique role in the communities that they serve. Unlike larger financial institutions, community banks such as the Bank can be more responsive to the needs of the Assessment Area and provide a more personal approach to the financial and other services offered by the Bank with a chance to get to know our customers and the needs of the neighborhoods in which they reside. As part of the social and economic fabric of the communities in which the Bank's offices are located, the Bank is positioned to offer support of local goals and to provide assistance in addressing neighborhood concerns.

The Bank has therefore established the goal of increased Bank participation in matters important to residents of the Assessment Area. As a small community based financial institution, the Bank employs relatively few individuals, but believes its branch employees - who primarily reside in the Bank's Assessment Area - possess a unique ability to understand the challenges modern banking and loan requirements, adverse economic conditions, and depressed housing and employment markets may pose to individuals and households in the Assessment Area. As residents of the communities surrounding the Bank's branch, the Bank's branch employees are aware of the needs of their communities and share the Bank's commitment to contributing to positive change in the Assessment Area. To support its employees, the Bank has implemented a program to provide employees with paid time off that is devoted to community service activities that advance economic and housing opportunities for LMI individuals residing in the Assessment Area during the five years of this Strategic Plan.

Service by the Bank and its employees performed pursuant to this Strategic Plan may be performed in a variety of ways. The Bank's branch employees have an unparalleled capacity to effectively share the knowledge and expertise they have acquired through their employment with the Bank and provide meaningful service to the communities of the Assessment Area. Bank and employee participation in and sponsorship of the efforts of educational institutions, service organizations, charities, community groups, nondenominational and religious organizations, and municipal/governmental sponsored pursuits are among the many types of the service activities that may be considered in satisfaction of the Bank's service goals. The services the Bank provides shall qualify for CRA credit so long as their primary purpose is community development, which includes, but is not limited to, community based child care, educational, health or social services targeted to low- or moderate-income individuals, and activities that revitalize or stabilize low- or moderate-income area, and otherwise satisfies the requirements of Community Development set forth in Part 345.12 of the Community Reinvestment Act.

The Bank will earn points based on the number of hours its employees have devoted to qualified CRA community service activities and the number of employees will be based on the number of employees as reported in the call report on December 31st of the year prior to the plan year. The bank wide service hour goals will start with a baseline of an assumed 1.50 hours of service required per bank employee. The Bank will apply adjustments to this goal based on in market resources (number of employees available to perform service hours in the Assessment Area without extensive travel) and historical performance. It is currently estimated that 5% of the Bank employees will work in the Cook County, Illinois Assessment Area and 95% work outside of the Assessment Area. Cook County branch employ 9 of its 94 employees as of December 31, 2021.

The historical performance for the Bank is exclusive to the Cook County Assessment Area and summarized below:

WTBT Historical Performance					2017	2018	2019	2020	Avg	Avg 17-19
Service Hours					49	48	57	7.5	40.4	51.3
Total Employees					76	78	79	74	76.8	77.7
Hours Per Employee					0.64	0.62	0.72	0.10	0.53	0.66

Based on the population and qualified CRA programs available for community service hours as outlined in the Assessment Area detailed review included earlier in this plan, the Bank has established that 100% of the total hours will be used to establish the goal for its Assessment Area.

Based on our historical performance of only 5% of the Bank's employees working in the Assessment Area (or residing within a reasonable distance) the Bank has established a goal for "Satisfactory" performance at 0.70 hours per bank employee for the first year of this plan. We believe this to be a challenging but achievable goal and was developed based on using 1.5 hours per employee and adjusting it for "in market" resources (5% of total) and an enhancement to past performance with a four-year average of 0.53 hours per employee or 0.66 hours per employee pre pandemic.

In years 2-5 of this Strategic Plan the service hours per employee will increase by 0.1 hours per Bank employee.

The Bank's service hour goals for its Assessment Area, its service goals and grading example are shown below (also see Exhibit 10):

Cook County Goals - Hours per employee										
Points	1	3	4	5	6	7	8	9	10	11
Plan Year 2022	0.400	0.400	0.500	0.600	0.700	0.800	0.900	1.000	1.100	1.200
Plan Year 2023	0.500	0.500	0.600	0.700	0.800	0.900	1.000	1.100	1.200	1.300
Plan Year 2024	0.600	0.600	0.700	0.800	0.900	1.000	1.100	1.200	1.300	1.400
Plan Year 2025	0.700	0.700	0.800	0.900	1.000	1.100	1.200	1.300	1.400	1.500
Plan Year 2026	0.800	0.800	0.900	1.000	1.100	1.200	1.300	1.400	1.500	1.600
Grading Example										
Points	1	3	4	5	6	7	8	9	10	11
Cook County - Plan Year 2022						0.820				
Calculated Points	0.00	0.00	0.00	0.00	0.00	7.00	0.00	0.00	0.00	0.00
								Sum		7.00

CATEGORY WEIGHTING

The Bank will also consider the weighting of each goal category for Lending, Investments/Grants and Community Service in the following fashion:

1. Lending Goal - 60%
2. Investment Goals – 30%
3. Service Goals – 10%

These weightings will be applied to the Overall Bank Test and represent the final Bank CRA regulatory rating.

OVERALL BANK TEST

The Bank’s regulatory CRA rating will be based on the Overall Bank Test. The Overall Bank Test will take each category grade as graded above and apply the category weighting to each.

Here is an example (also see Exhibit 7):

Grading Summary (EXAMPLE) - Exhibit 7			
Scale	Min	Max	
Outstanding	9	11	
Satisfactory	6	8	
Needs to Improve	3	5	
Substantial Noncompliance	0	2	
Overall Bank Test			
	Score	Weight	Adj Total
Lending Test	6.52	60%	3.91
Investment Test	9.00	30%	2.70
Service Test	7.00	10%	0.70
		Grand Total	7.31
CRA Regulatory Rating			Satisfactory

All of the above grading examples are based on hypothetical data as described in Exhibit 8 for example grading purposes only.

VI. OTHER STRATEGIC PLAN PROVISIONS

EFFECTIVE DATE AND TERM OF THE STRATEGIC PLAN

The Bank's currently approved Strategic Plan covers the five (5) years beginning on January 1, 2022, through December 31, 2026. The Bank's Board of Directors and management will oversee the Bank's progress in meeting the Strategic Plan's objectives. The Bank will request FDIC approval to modify or amend the Strategic Plan only if there is a material change in the assumptions underlying the Strategic Plan or in the objectives or operations of the Bank, and such changes would make the Strategic Plan no longer appropriate or viable. In such event, the Bank will administer the modified or amended Strategic Plan in accordance with the FDIC regulatory requirements, timeframes, and guidelines for approval of a CRA strategic plan. Any proposed changes to this Strategic Plan will follow the appropriate procedures for approval and notification.

TERM OF THE STRATEGIC PLAN

The current term of the Strategic Plan is anticipated to remain in effect and expiring on December 31, 2026.

MAIN OFFICE INFORMATION

The Bank's main office is located at 7820 West 26th Street, North Riverside, Illinois. Banking services are provided through the Bank's main office Monday through Saturday through its teller and drive-up facilities. Customers may visit the Bank's full-service offices to meet with residential lending personnel, or may contact the Bank through phone, email or the Internet.

BANKING MARKETS

The Bank targets banking customers based upon their geographic proximity to the Bank's full-service deposit facilities, mortgage loan customers based on their residential financing needs, and business credit customers based on business size, funding structure and geographic location. As such, the Bank generally has banking customers within a ten-mile radius of the Bank's main office locations, and mortgage and business loan customers from all over the United States, including communities that are not in close proximity to the Bank's full-service offices. Therefore, the Bank views all locations of the country which are being supported by the Bank's mortgage and business loan services as part of its banking market.

SATISFACTORY AND OUTSTANDING GOALS

The Bank believes the measurable goals for Lending, Investments and Grants, and Service as specified above, adequately considers the realities of the Bank's current and projected business model, operating environment, asset size, competitive abilities including legal restrictions on maximum loan amount, and limitations on the number and area of expertise of Bank personnel,

and meeting the goals constituting a "Satisfactory" or "Outstanding" performance, as appropriate, set forth under this Strategic Plan shall fulfill the Bank's obligations under the CRA.

ONGOING REVIEW OF PERFORMANCE GOALS AND MEASUREMENT STANDARDS

The Bank recognizes that the Lending, Investment and Grants, and Service goals outlined in this Strategic Plan are based on projections relating to the Bank's business model, legal and regulatory assumptions affecting the banking industry generally, as well as general economic conditions. As the projections, assumptions and economic conditions used in creating this Strategic Plan are subject to change, the Bank's Board of Directors and senior management of the Bank will monitor the Bank's performance in relation to the goals of this Strategic Plan on a quarterly basis. Should modifications to this Strategic Plan as a result of the Bank's quarterly reviews be required in the future, all such changes will be made in accordance with the FDIC's requirements, guidelines and approval process. Future adjustments are expected to be made only if the changes in the assumptions underlying this Strategic Plan are so significant as to render the goals of this Plan no longer viable or appropriate.

ELECTION OF ALTERNATIVE PERFORMANCE EVALUATION

Although the management and employees of the Bank both intend and expect that the Bank will meet or exceed all goals established in this Strategic Plan, the Bank will elect to be evaluated under the appropriate alternative assessment method under the regulation if the Bank fails to achieve a Satisfactory rating under this Strategic Plan.

PRIOR PUBLICATION NOTICES

Exhibit 11 reflects the publication notices in our defined Assessment Area.