

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 10, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Albany Bank and Trust Company, National Association **Charter Number (14688)** 3400 West Lawrence Ave. Chicago, Illinois 60625

> Office of the Comptroller of the Currency Downers Grove Field Office 2001 Butterfield Road, Suite 400 Downers Grove, Illinois 60515

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The lending test is rated: Satisfactory. The community development test is rated: Satisfactory.

The major factors that support this rating include:

- Albany Bank and Trust Company, N.A.'s (Albany or bank) distribution of home mortgage loans to low- and moderate-income (LMI) census tracts (CTs) within its assessment area (AA) during the evaluation period is reasonable.
- A majority of loans that Albany originated during the evaluation period were located inside its AA.
- Albany's average loan-to-deposit (LTD) ratio is reasonable given the bank's size and financial condition, and the credit needs of its AA.
- Albany demonstrates adequate responsiveness to community development (CD) needs within its AA by engaging in a combination of CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

Considering Albany's size and financial condition, and the credit needs of its AA, the bank's loan-todeposit ratio (LTD) is reasonable. Albany's LTD averaged 80.6 percent since the last evaluation. We compared the bank's averaged LTD to nine similarly situated banks with total assets between \$656 million and \$1.0 billion in Cook County. The combined average quarterly LTD for the similarly situated banks was 76.9 percent, with the lowest at 58.8 percent and the highest at 115.2 percent. Albany had the third highest LTD in this group.

Lending in Assessment Area

A majority of the bank's loans originated for the years 2018 through 2020 were inside of the AA. The bank originated and purchased 69.4 percent of its total loans inside the bank's AA. This analysis was 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. We calculated the proportion of lending inside versus outside the AA on a bank-wide basis. The analysis considered all loans reported by the bank on its 2018 and 2019 Home Mortgage Disclosure Act Loan Application Register (HMDA LAR). The bank did not originate sufficient loans in 2020 to meet the filing threshold for HMDA, therefore, we utilized the bank's internal data to test home mortgage loans.

| | | Number o | of Loans | | | Dollar A | Amount | of Loans ((| 00s) | |
|---------------|-----|----------|----------|------|-------|----------|--------|-------------|------|----------|
| Loan Category | Ins | ide | Out | side | Total | Insid | le | Outsi | de | Total |
| | # | % | # % | | # | \$ | % | \$ | % | \$(000s) |
| Home Mortgage | | | | | | | | | | |
| 2018 | 18 | 78.3 | 5 | 21.7 | 23 | 24,460 | 86.4 | 3,835 | 13.6 | 28,295 |
| 2019 | 12 | 63.2 | 7 | 36.8 | 19 | 12,490 | 69.0 | 5,605 | 31.0 | 18,095 |
| 2020 | 29 | 67.4 | 14 | 32.6 | 43 | 48,590 | 75.6 | 15,706 | 24.4 | 64,296 |
| Total | 59 | 69.4 | 26 | 30.6 | 85 | 85,540 | 77.3 | 25,146 | 22.7 | 110,686 |

Description of Institution

Albany is a \$733 million intrastate community bank located in Chicago, Illinois. The bank is a wholly owned subsidiary of Albank Corporation, a one-bank holding company. The bank is a full-service institution, and it operates four branch offices including three in Chicago and one located in nearby Skokie, Illinois. The bank owns and operates seven automated teller machines (ATM), five of which accept deposits. Six of the ATMs are located at branches, and one is a stand-alone ATM located on the campus of North Park University in Chicago. The bank has not experienced any merger or acquisition activity since its prior CRA evaluation.

The bank's strategic focus is serving the financial needs of small- and medium-sized businesses, real estate owners/operators, professionals, and non-profit organizations. As of December 31, 2020, the bank's loan portfolio totaled \$435 million (64 percent of total assets) and Tier 1 capital totaled \$102 million. The loan portfolio consists of commercial real estate loans (42 percent), multifamily real estate loans (39 percent), other commercial loans (11 percent) and one-to four family residential real estate loans (8 percent).

The bank does not have any legal impediments that hinder its ability to meet the needs of its AA. Albany received a "Satisfactory" rating at its last CRA evaluation, dated November 26, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Albany was evaluated under Intermediate Small Bank (ISB) examination procedures which include a lending test and a CD test to assess compliance with the CRA. The lending test evaluates the bank's record of meeting the credit needs of its AA through lending activities. Our review focused on the bank's primary lending product of home mortgage loans, primarily multifamily or investor owned properties. We analyzed 2018 and 2019 HMDA data and a sample of 2020 home mortgage loans. Due to a change in the metropolitan division (MD) borders in the Chicago-Naperville-Elgin, IL, WI, IN MSA beginning in 2019 (which affected median family income calculations), we reviewed 2018 loan data separately from 2019 and 2020. The CD test evaluates the bank's responsiveness to the CD needs in its AA through qualified lending, investments, and services. The evaluation period for this review is from

January 1, 2018, to December 31, 2020. We did not consider any affiliate or subsidiary lending activity in this review.

Data Integrity

We reviewed of the accuracy of Albany's 2018 and 2019 HMDA data in October 2021 using independent audit findings. We also tested 100 percent of the 2020 home mortgage loans, as the bank was no longer a required HMDA reporter for that year due to a change in reporting criteria. We determined the bank's data was reliable for the purpose of our analysis at this CRA examination.

Selection of Areas for Full-Scope Review

Albany has one AA, and we completed a full-scope review of the AA.

Ratings

Albany's overall rating is based on the full-scope review of its AA. Our analysis placed more weight on performance during 2019 and 2020 due to the bank's larger volume of loan originations during those years.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Illinois

CRA rating for the State of (name of state)¹: Satisfactory **The Lending Test is rated:** Satisfactory **The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- Albany's distribution of home mortgage loans to LMI CTs is reasonable.
- A majority of loans that Albany originated during the evaluation period were located inside its AA.
- Albany's average LTD ratio is reasonable given the bank's size and financial condition, and the credit needs of its AA.
- Albany demonstrates adequate responsiveness to CD needs by engaging in a combination of CD loans, qualified investments, and CD services.

Description of Institution's Operations in Illinois

Albany has one AA consisting of a portion of Cook County in the state of Illinois. Cook County is in the Chicago-Naperville-Evanston IL Metropolitan Division (MD) 16984 of the Chicago-Naperville-Elgin IL-IN-WI MSA 16980. The AA contains 303 CTs primarily located within the city of Chicago, but also include a limited number of CTs within the communities of Skokie, Evanston, Lincolnwood, and Niles. The AA has remained unchanged since the bank's prior CRA evaluation, although the name of the MD changed in 2019 from Chicago-Naperville-Arlington Heights IL MD 16974 when Kendall County was removed. This change did not affect the bank's AA.

The AA meets the regulatory requirements that it consist of whole geographies and not arbitrarily exclude LMI CTs or reflect any illegal discrimination. The 303 CTs include 16 (5.3 percent) low-income CTs, 100 (33.0 percent) moderate-income CTs, 71 (23.1 percent) middles-income CTs, 115 (37.9 percent) upper-income CTs, and 2 (0.66 percent) with no income information.

Competition

Competition for deposits within Albany's AA is strong. According to the June 30, 2020 FDIC Deposit Market Share Report, Albany had \$567 million in deposits from within Cook County and ranked 39th out of 102 institutions with a 0.15 percent deposit market share. The top five depository banks hold a significant portion of the deposits in Cook County, and include J.P. Morgan Chase Bank, N.A. (22.5 percent), BMO Harris Bank, N.A. (18.4 percent), Bank of America, N.A. (10.9 percent), The Northern Trust Co. (8.7 percent) and CIBC Bank U.S.A. (6.7 percent).

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

| | Assessme | nt Area: A | lbany | | | |
|---|-----------|---------------|--------------------|------------------|-----------------|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 303 | 5.3 | 33.0 | 23.1 | 38.0 | 0.7 |
| Population by Geography | 1,166,310 | 4.8 | 36.4 | 26.9 | 31.5 | 0.4 |
| Housing Units by Geography | 511,145 | 4.3 | 33.2 | 26.0 | 35.9 | 0.5 |
| Owner-Occupied Units by Geography | 214,688 | 2.2 | 27.4 | 31.8 | 38.4 | 0.2 |
| Occupied Rental Units by Geography | 247,807 | 5.9 | 37.3 | 21.4 | 34.7 | 0.7 |
| Vacant Units by Geography | 48,650 | 5.8 | 38.3 | 23.7 | 31.5 | 0.6 |
| Businesses by Geography | 78,524 | 2.5 | 25.1 | 27.1 | 45.0 | 0.2 |
| Farms by Geography | 729 | 2.1 | 25.7 | 29.6 | 42.7 | 0.0 |
| Family Distribution by Income Level | 242,091 | 26.5 | 16.5 | 16.6 | 40.4 | 0.0 |
| Household Distribution by Income Level | 462,495 | 27.6 | 15.8 | 16.6 | 40.0 | 0.0 |
| Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL | | \$75,024 | Median Hous | ing Value | | \$303,137 |
| | | | Median Gros | s Rent | | \$1,054 |
| | | | Families Belo | ow Poverty L | evel | 12.1% |

Demographics

The NA category consists of geographies that have not been assigned an income classification.

Population

According to 2015 ACS Census data and 2020 Dunn and Bradstreet data, the AA population was 1,166,310 persons with 56,386 (4.8 percent) residing in low-income CTs, 424,843 (36.4 percent) residing in moderate-income CTs, 313,670 (26.9 percent) residing in middle-income CTs, 366,984 (31.5 percent) residing in upper-income CTs, and 4,427 residing in the CT designated NA.

The 2015 ACS Census data and 2020 Dunn and Bradstreet data also shows that there were 242,091 families located within Albany's designated AA. The distribution of families by income level was 64,073 (26.5 percent) low-income, 40,008 (16.5 percent) moderate-income, 40,295 (16.6 percent) middle-income, and 97,715 (40.0 percent) upper income. Median family income was \$75,024.

| Median Family Incomes | Low <50% | | | | | | | |
|-----------------------|----------------------|-------------------------|---------------------------|------------|--|--|--|--|
| Chicag | go-Naperville-Arling | ton Heights, IL MD Medi | ian Family Income (16974) | | | | | |
| 2018 (\$82,400) | <\$41,200 | \$41,200 to <\$65,920 | \$65,920 to <\$98,880 | ≥\$98,880 | | | | |
| | Chicago-Naperville- | Evanston, IL Median Far | nily Income (16984) | | | | | |
| 2019 (\$82,000) | <\$41,000 | \$41,000 to <\$65,600 | \$65,600 to <\$98,400 | ≥\$98,400 | | | | |
| 2020 (\$84,800) | <\$42,400 | \$42,400 to <\$67,840 | \$67,840 to <\$101,760 | ≥\$101,760 | | | | |

The chart above provides the median family income ranges for the Chicago-Naperville-Arlington Heights MD (16974) and the Chicago-Naperville-Evanston MD (16984). The Office of Management and Budget (OMB) made the changes for 2019 and later. The low- and moderate-income ranges were modestly lower after the revisions.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment rates in the AA were stable until the COVID-19 pandemic national emergency began in March 2020. As of December 31, 2020, unemployment rates for Cook County remained higher than the state and national averages of 9.5 percent and 6.7 percent, respectively, but lower than the peak unemployment of 17.1 percent as of April 2020.

| Annual Unemployment Rates | | | | | | | | | | | | |
|---------------------------|-----------------------------|-----------------------------------|---|--|--|--|--|--|--|--|--|--|
| 2018 | 2019 | 2020 | Peak | | | | | | | | | |
| 4.2% | 4.0% | 11.1% | 17.1% | | | | | | | | | |
| 4.4% | 4.0% | 9.5% | 16.3% | | | | | | | | | |
| 3.9% | 3.6% | 6.7% | 14.7% | | | | | | | | | |
| | 2018 4.2% 4.4% | 2018 2019 4.2% 4.0% 4.4% 4.0% | 2018 2019 2020 4.2% 4.0% 11.1% 4.4% 4.0% 9.5% | | | | | | | | | |

Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year. Peak is as of April 30, 2020.

Community Contact

We held conversations with two community contacts and reviewed details of previous community contacts that serve the Albany Park community to determine the AA needs. The community contacts noted that business owner financial education and financing needs for the small businesses as well as the preservation of affordable housing within the AA are ongoing needs within the area. Both community contacts noted that due to the large migrant population, Albany Park has been negatively impacted by the effects of the pandemic and ensuing lockdowns. The contacts noted that community organizations have pivoted to housing stabilization and financial counseling to counter the effects of the pandemic, causing an additional need for social services within the AA.

Scope of Evaluation in Illinois

Albany Bank and Trust Company has one AA in the state of Illinois, and we completed a full scope of this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

Albany's performance under the Lending Test in the state of Illinois is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, Albany's lending performance in the state of Illinois is reasonable.

Distribution of Loans by Income Level of the Geography

Albany's geographic distribution of loans in its AA is reasonable. We did not identify any unexplained conspicuous lending gaps in the AA

Home Mortgage Loans

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

We evaluated the data using two separate analysis periods pursuant to changes in the MDs made by the OMB during 2018 for periods 2019 and later. We analyzed home mortgage loans originated in 2018 by comparing the bank's performance to area demographics and peer performance data for the Chicago-Naperville-Arlington Heights IL MD (16974). We analyzed home mortgage loans originated in 2019 and 2020 by comparing the bank's performance to area demographics and peer performance data for the Chicago-Naperville-Arlington Heights IL MD (16974). We analyzed home mortgage loans originated in 2019 and 2020 by comparing the bank's performance to area demographics and peer performance data for the Chicago-Naperville-Evanston MD (16984).

<u>2018</u>

Albany's distribution of loans to borrowers in low- and moderate-income CTs within the AA during 2018 was excellent. The percentage of the bank's loans to borrowers in both low- and moderate-income CTs exceeded both the percentage of AA families living in low- and moderate-income CTs and the percentage of aggregate lending that occurred in those CTs.

<u>2019/2020</u>

Albany's distribution of loans to borrowers in low- and moderate-income CTs within the AA during 2019 and 2020 was reasonable. The percentage of the bank's loans to borrowers in low-income CTs exceeded both the percentage of AA families living in low-income CTs and the percentage of aggregate lending that occurred in those CTs. While the percentage of the bank's loans to borrowers in moderate-income CTs was lower than the percentage of AA families living in moderate-income CTs, it was reasonably near the percentage of aggregate lending that occurred in those CTs.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

We did not perform an analysis on the borrower distribution of loans originated or purchased by Albany during the evaluation period because 100 percent of the reportable loans within the bank's AA were to finance or refinance the acquisition of multi-family residential properties or investor-owned one-to-four family residential properties. The bank is not required to report borrower income for these types of loans.

Responses to Complaints

Albany did not receive any written comments or complaints regarding efforts to meet the credit needs of its AA during the evaluation period. The OCC has not received any written complaints, comments, or inquiries concerning Albany and its efforts to comply with the spirit and intent of the CRA.

COMMUNITY DEVELOPMENT TEST

Albany's performance under the Community Development Test in the state of Illinois is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, Albany exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Albany's CD loans and qualified investments for this evaluation totaled \$13.2 million, or 12.7 percent of the bank's tier 1 capital. The majority of dollars benefitted stabilizing LMI geographies during the COVID-19 pandemic and supporting community services for LMI individuals.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate Albany's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

| | Community Development Loans | | | | | | | | | | | | |
|-----------|-----------------------------|--------|------------|---------|--|--|--|--|--|--|--|--|--|
| | <u>#</u> | % of # | <u>\$</u> | % of \$ | | | | | | | | | |
| In AA | 25 | 71.4 | 8,500,605 | 77.5 | | | | | | | | | |
| Out of AA | 10 | 28.6 | 2,472,100 | 22.5 | | | | | | | | | |
| Total | 35 | 100.0 | 10,972,705 | 100.0 | | | | | | | | | |

Albany's level of CD lending provided excellent responsiveness to community credit needs in the AA. During this evaluation period, the bank originated 35 CD loans totaling almost \$11 million, or 10.5 percent of the bank's tier 1 capital. A majority of these loans were within the bank's AA. Those that were outside of the AA were still within the MSA where the bank's AA is located. CD loans within the AA include:

- \$3.7 million in 21 Small Business Administration guaranteed Paycheck Protections Program (PPP) loans made to businesses located in LMI CTs within the AA. The PPP was established under the CARES Act in response to the COVID-19 pandemic. PPP loans help revitalize and stabilize LMI geographies by retaining businesses and related jobs during the pandemic. These loans helped businesses continue to make payroll on 165 jobs during the early stage of the pandemic when many businesses had to shut down.
- \$4.8 million in four loans helping to address community service needs within the AA. One loan for \$3 million was to purchase one million critically needed water-resistant hospital isolation gowns for protection of health care and emergency workers during the pandemic. The other three loans were to address needs of LMI individuals regarding mental health care, academic and related services to teens that are in alternative school programs, and youth programs within a moderate-income CT.

Statewide/Regional

Albany also originated 10 CD loans outside of its AA but within the MSA where the bank's AA is located. These were PPP loans to businesses within LMI areas. The loans helped provide payroll for 106 jobs while many of the businesses had to shut down in the early stages of the pandemic.

Number and Amount of Qualified Investments

The Qualified Investments Table, shown below, sets forth the information and data used to evaluate Albany's level of qualified investments. This table includes donations that meet the CD definition.

| | | | | Qua | lified In | vestments | | | | |
|-----------|-------|-----------|------|------------|-----------|-----------------|---------|---------------------------|---|---------|
| | Prior | r Period* | Curr | ent Period | Tot | al (Curren | Period) | Unfunded Commitments** | | |
| | # | \$(000) | # | \$(000) | # | % of Total # | \$(000) | % of Total \$ | # | \$(000) |
| In AA | 0 | 0 | 68 | 125 | 68 | 75.6 | 125 | 5.6 | 0 | 0 |
| Out of AA | 2 | 2,079 | 20 | 36 | 22 | 24.4 | 2,115 | 94.4 | 0 | 0 |
| Total | 2 | 2,079 | 88 | 161 | 90 | 100.0 | 2,240 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Albany's level of qualified investments reflects adequate responsiveness to community needs in this AA. During this evaluation period, the bank made 88 grants/donations totaling \$160,995. In addition, we considered the ongoing impact of two prior period investments totaling \$2.1 million. A majority of the qualified grants/donations were invested in the AA. The grants/donations made outside of the AA were all still within the MSA. The largest dollar amount of investments were the prior period bonds that were located outside the AA, but within the state of Illinois. Total qualified investments, including grants/donations, represented 2.2 percent of tier 1 capital. Qualified investments within the AA include:

- 32 grants/donations totaling \$68,113 that benefited organizations providing community services to LMI individuals for health care, food, homeless needs, clothing, and educational/youth programs.
- 16 grants/donation totaling \$25,535 focusing on revitalizing and stabilizing LMI geographies. Donations were for activities to help attract and retain businesses and residents, with a majority of

the dollars going to organizations working to improve commercial districts within Albany Park and surrounding neighborhoods.

- 7 grants/donations totaling \$13,300 with the purpose of providing affordable housing to LMI families. Some of the organizations benefiting from these donations include an organization providing affordable housing for woman transitioning out of homelessness, a organization providing temporary housing for the homeless, and a Housing and Urban Development (HUD) certified nonprofit organization providing affordable housing affordable housing assistance and counseling to LMI families.
- One grant/donation totaling \$5,000 with the purpose of economic development by financing or assisting small businesses. The bank donated to a fund designed for rapid assistance to small businesses in East Albany Park significantly impacted by the COVID-19 pandemic.

Statewide/Regional

Albany also made 20 qualified donations outside the AA during the evaluation period and received credit for two qualified investments made prior to the evaluation period that were still outstanding. The largest dollar amount included two bonds to schools primarily serving LMI students. Both of these schools are outside of the AA but within the state of Illinois. Nineteen of the donations outside of the AA were primarily community service purposes benefiting LMI individuals with the MSA.

Extent to Which the Bank Provides Community Development Services

Albany's level of services reflect adequate responsiveness to community needs within its AA. One of the bank's four locations is in a moderate-income CT. Traditional banking services are offered at all four locations, providing access to needed banking services in the AA. Bank board members, officers, and employees are active in several community organizations. Our review of these activities identified that eight organizations primarily engaged in CD activities received financial assistance or service from ten different bank representatives. These individuals provided 271 hours of CD service. Six out of the eight organizations were within the AA. Those outside of the AA were still within the city of Chicago. Organizations within the AA received the following services:

- Four officers, employees, or board members assisted organizations or projects primarily focused on providing affordable housing for LMI families. Services including serving on a housing committee overseeing properties funded in part through Low-Income Housing Tax Credit programs and fundraising for a HUD-certified nonprofit organization focused on affordable housing.
- Six board members, officers, or employees assisted organizations or projects primarily focused on providing community services to LMI individuals. Services include providing financial literacy programs for LMI individuals and assisting families in completing applications to secure Low-Income Home Energy Assistance and other government assistance programs.
- Two bank representatives provided financial literacy seminars. The seminars focused on economic development and resources needed to help start or expand small businesses.

Statewide/Regional

Albany provided services outside its assessment area but still within the city of Chicago that had the potential to impact the AA. One bank representative served as a Board member and on finance, fundraising, and strategic committees of an organization focusing on education for LMI individuals. Four other representatives assisted with fundraising for affordable housing and community service organizations serving primarily LMI individuals.

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 MSA(s) and non-MSA(s) 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: | 01/01/2018 to 12/31/2020 | |
|--|---|--|
| Bank Products Reviewed: | Home mortgage loans, comm community development serv | unity development loans, qualified investments, ices |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| NONE | | |
| List of Assessment Areas and Type o | f Examination | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| AA includes a portion of Cook County, consisting of 303 contiguous CTs | Full Scope | The Chicago-Naperville-Evanston IL MD of the Chicago-Naperville-Elgin IL-IN-WI MSA |
| | | |

Appendix B: Summary of MMSA and State Ratings

| RATIN | RATINGS Albany Bank and Trust Company, N.A. | | | | | | | | | | | | |
|--|---|-------------------|--|--|--|--|--|--|--|--|--|--|--|
| Overall Bank: | Lending Test Rating* | CD Test Rating | Overall Bank/State/ Multistate Rating | | | | | | | | | | |
| Albany Bank and Trust Company, N.A. | Satisfactory | Satisfactory | Satisfactory | | | | | | | | | | |
| State: | | | | | | | | | | | | | |
| Illinois | Satisfactory | Satisfactory | Satisfactory | | | | | | | | | | |
| | | | | | | | | | | | | | |

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

| | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|---------------------|---------------------------|------------|-----------------------|-------------------|--|-----|----------------------------|--|------|----------------------------|--|------|----------------------------|--|------|------|--|-----|----------------------------|
| Assessment Area: | Bank # | Bank \$ | % of Bank Total | Overall Market | % of Owner- Occupied Housing Units | | % of Aggregate Loans | % of Owner- Occupied Housing Units | | % of Aggregate Loans | % of Owner- Occupied Housing Units | | % of Aggregate Loans | % of Owner- Occupied Housing Units | | | % of Owner- Occupied Housing Units | | % of Aggregate Loans |
| Albany 2018 | 18 | 24,460 | 100.0 | 30,767 | 2.5 | 5.6 | 2.8 | 27.1 | 38.9 | 27.0 | 32.5 | 11.1 | 26.8 | 37.6 | 44.4 | 43.2 | 0.2 | 0.0 | 0.3 |

| Table O | : Asso | essmen | nt Area | a Distri | bution | of Ho | me Moi | rtgage I | Loans | by Inco | ome Ca | tegor | y of the | Geogra | phy | | | 20 | 19-2020 |
|---------------------|---------------------------|-------------|-----------------------|-------------------|--|-------------------|----------------------------|--|------------------------|----------------------------|--|----------------------|----------------------------|--|--------|----------------------------|--|-----|----------------------------|
| | Total Home Mortgage Loans | | | | Low- | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Income | Tracts | Not Available-Income Tracts | | |
| Assessment Area: | Bank # | Bank \$ | % of Bank Total | Overall Market | % of Owner- Occupied Housing Units | | % of Aggregate Loans | % of Owner- Occupied Housing Units | | % of Aggregate Loans | % of Owner- Occupied Housing Units | | % of Aggregate Loans | % of Owner- Occupied Housing Units | | % of Aggregate Loans | % of Owner- Occupied Housing Units | | % of Aggregate Loans |
| Albany 2019 | 12 | 12,490 | 100.0 | 38,151 | 2.2 | 16.7 | 2.3 | 27.4 | 8.3 | 24.9 | 31.8 | 25.0 | 26.3 | 38.4 | 50.0 | 46.4 | 0.2 | 0.0 | 0.2 |
| Albany 2020 | 29 | 48,590 | 100.0 | 56,874 | 2.2 | 6.9 | 2.2 | 27.4 | 24.1 | 23.8 | 31.8 | 31.0 | 26.5 | 38.4 | 37.9 | 47.3 | 0.2 | 0.0 | 0.1 |
| Total | 41 | 61,080 | 100.0 | 56,874 | 2.2 | 9.8 | 2.2 | 27.4 | 19.5 | 23.8 | 31.8 | 29.3 | 26.5 | 38.4 | 50.0 | 41.5 | 0.2 | 0.0 | 0.1 |
| Source: 2015 | ACS Ce | ensus; 01/0 | 01/2019 - | 12/31/2020 | Bank Data | , 2020 H | MDA Aggre | gate Data, | "" data | not availab | le. | | | | | | | | |

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not ava Due to rounding, totals may not equal 100.0%