UNITED TRUST BANK

Federally Chartered Savings Bank | Charter No. 716310 | FDIC No. 35393

COMMUNITY REINVESTMENT ACT STRATEGIC PLAN

January 1, 2027 – December 31, 2031

Assessment Areas In: Illinois • Georgia • Ohio

UNITED TRUST BANK
AMERICA'S COMMUNITY LENDER

Table of Contents

2

I. Introduction

a. Plan Overview

This Community Reinvestment Act Strategic Plan ("Plan") is submitted to serve as United Trust Bank's ("UTB" or "Bank") plan for compliance with the Community Reinvestment Act ("CRA"). This Plan is intended to reduce regulatory burden while providing clear, measurable goals for CRA compliance under United Trust Bank's business model and would be used as the primary framework for evaluating CRA performance in accordance with 12 CFR Part 25. This version of the Plan incorporates the Bank's two newly approved assessment areas in Georgia and Ohio, described more fully in Section IV below.

b. United Trust Bank Overview

United Trust Bank is chartered as a Federal Savings Association and, therefore, is subject to regulation by the Office of the Comptroller of the Currency ("OCC"), out of the OCC's Chicago Field Office. 12 CFR, Part 25 of the OCC Rules and Regulations provide regulated institutions with the option to be evaluated using examination procedures for institutions operating under a CRA Strategic Plan. In accordance with this regulation, this Plan outlines United Trust Bank's commitment to the CRA and establishes quantitative benchmarks for Community Development Loans and Investments, and Community Development Service. Central to this commitment is a goal, set forth in Section VIII, to provide home mortgage lending to low- and moderate-income ("LMI") borrowers within each of the Bank's designated Assessment Areas. This Plan will be utilized to assess United Trust Bank's CRA performance by management, its Board of Directors, and by the OCC.

c. Profile

United Trust Bank	
FDIC Certificate Number	35393
OCC Charter Number	716310
Tier 1 Capital	$15,899,000
Total Assets	$170,606,000
Total Deposits	$121,208,000
Existing Branch Office	12330 S. Harlem Avenue, Palos Heights, IL 60463
OCC-Approved Branch Offices (8/4/2026)	Ohio Branch – 1790 Town Park Blvd, Suite J, Uniontown, OH 44685 (Cert. No. 220373A) Georgia Branch – 318 Maxwell Rd, Suite 200, Alpharetta, GA 30009 (Cert. No. 220374A)

Note: the financial data is as of December 31, 2025

d. Performance Context and Relevant History

United Trust Bank was founded November 24, 2000, as a federal savings association, serving the communities of Palos Heights and surrounding communities on the southwest side of Chicago, Illinois. The Bank is a wholly-owned subsidiary of United Bancorp, Inc. (the holding company), which is owned by a diverse group of investors predominantly from the Chicagoland area with no single investor owning more than 10% of the holding company. The Bank grew slightly in the lead-up to the Great Recession but struggled to gain profitability. As the financial struggles of the Recession took hold, operating losses mounted and the Bank adopted a strategy of shrinking the balance sheet in order to preserve capital and prevent failure. The Bank was in a "Troubled Condition" and likely would not have survived had current management not stepped in during 2018.

By year-end 2018, UTB had reduced total assets to $29 million and had cumulative retained earnings of -$14.9 million. Current management brought $4 million in new capital and another $3.8 million in 2020, to support operations and allow the Bank to grow to scale for sustainable profitability.

Management strategically brought in a residential mortgage origination team that generated much-needed revenue for the Bank without straining the Bank's limited capital. The mortgage origination group operates from loan production offices in several states, providing tens of millions in secondary market originations to create fee income. The group also originates millions in residential loans held in the Bank's portfolio, but again, these loans are originated all over the country. This strategy has effectively saved the Bank by creating earnings and capital retention, with the Bank's very first year of profitability occurring in 2021.

UTB serves a geographically dispersed market of clients for residential lending needs. This strategy, however, inadvertently created issues with standard compliance with the Community Reinvestment Act, resulting in a "Needs to Improve" CRA rating at the Bank's most recent examination, finalized in October 2024, driven principally by the Bank's low in-and-out lending ratio. To help balance origination volume so that more originations occur within designated Assessment Areas, the Bank filed applications with the OCC to designate two existing loan origination and administrative offices – in Alpharetta, Georgia and Uniontown, Ohio – as full-service branches. On August 4, 2026, the OCC approved both applications (CATS Control Nos. 2026-BranchNew-346284 (Georgia) and 2026-BranchNew-346269 (Ohio)), and this Plan accordingly incorporates data and goals for the historical Illinois Assessment Area together with the new Georgia and Ohio Assessment Areas, as described in more detail herein.

e. Term of the Plan

Consistent with 12 C.F.R. § 25.27(c)(1), this Plan has a term of five years, effective January 1, 2027, through December 31, 2031, and includes annual interim measurable goals for each year of the term as set forth in Section VIII. The Plan's fiscal year for measuring performance against these goals runs from January 1 through December 31, consistent with the Bank's Assessment Area performance data reported herein.

II. The Community Reinvestment Act

a. Background

Congress passed the Community Reinvestment Act in 1977 to encourage banks to meet the credit needs of their local communities, including low- and moderate-income areas. The CRA regulations establish that bank examiners evaluate lending activity in the areas around a bank's branches and other deposit-taking areas (like Automated Teller Machines). These areas are referred to as the bank's Assessment Area ("AA"). Assessment Areas are typically identified by Metropolitan Statistical Areas ("MSA"s); Counties, Cities or Towns; or even by Census Tracts.

The CRA was created to combat banks' refusals to lend in particular neighborhoods or areas because of the income of the residents living there. Examiners will review lending data to determine if a bank is lending appropriately within its Assessment Area and not excluding areas in a prohibited way. An important component of community bank compliance with CRA lending is via the “in-and-out” ratio.

The in-and-out ratio is a measure used by regulators to evaluate a small bank's lending performance inside versus outside of its designated AA. The in-and-out ratio assesses how much of a bank's total lending activity is located within its AA, compared to how much takes place outside of it. The calculation includes both loan originations and purchases.

Regulators evaluate the ratio by comparing it against similar institutions and considering the bank's specific circumstances. For a bank to receive a "Satisfactory" CRA rating, the percentage of its lending activities within its AA generally must be at least a majority (more than 50%) of loans originated. A bank's performance is further judged in the context of its size, financial condition, strategic focus, and the opportunities available within its AA. At its most recent CRA examination in 2024, UTB’s rating was a “Needs Improvement,” largely because most of the loans originated by the Bank were not within its then-single (two county) AA. This examination was conducted before the approval of the Georgia and Ohio branches described in Section I.d, and therefore only considered lending activity in the Illinois AA.

As demonstrated in Section VII below, the addition of the Georgia and Ohio AAs converts a substantial volume of previously out-of-AA lending into in-AA performance, representing a meaningful improvement to the Bank’s in-and-out ratio.

b. UTB’s Commitment to the Community Reinvestment Act

UTB acknowledges its important obligation to serve the credit needs of the communities from which it will draw its deposits and in which it will operate. Consistent with its obligation to safe and sound banking practices, the Bank will pursue a robust CRA program within its Designated AAs. The Bank strives to maintain contact with community leaders, non-profit organizations, and other interested parties to determine critical needs in the community and has done so for assistance in development of this Plan. Bank management intends to administer its CRA program with an objective of maintaining a minimum performance rating of “Satisfactory,” but striving to achieve a performance rating of “Outstanding.”

The Board has designated EVP & Chief Credit Officer Mr. Mike Mashke as its CRA Officer. The Bank’s Co-President and Chief Banking Officer, Mr. Jim Esry, will retain primary responsibility for ensuring adherence to this Plan, with Mr. Mashke providing CRA administration, regulatory reporting, and day-to-day oversight of the goals set forth herein. Mr. Esry will provide detailed reports at least bi-annually to the Board’s Audit Committee so that adherence to the goals and objectives of this Plan are met and monitored, and adjustments can be made accordingly. The Board will ensure that adequate resources – including staffing, budget, and community development lending and investment capacity – are made available to achieve the goals established in this Plan across all three of the Bank’s Assessment Areas.

c. Public Notice

The Bank is required to formally seek public comment on the CRA Strategic Plan for at least 30 days by publishing notice in at least one newspaper of general circulation in each of its Assessment Areas. Consistent with the Bank’s expanded, three-state AA footprint, and using the same newspapers selected for the Bank’s Georgia and Ohio branch application public notices, the Bank will publish notice of this Plan in the Chicago Daily

Law Bulletin (Illinois AA), the Alpharetta-Roswell Herald (Georgia AA), and the Akron Legal News (Ohio AA). Refer to Appendix B for the content included in the public notice.

III. CRA Strategic Plan Development

a. Plan Approach

Management and the Board considered several factors while developing this Plan, including the Bank's business strategy and budget forecasts, competitive and regulatory environments, but most importantly, the financial needs of the residents in each of the Bank's AAs. To determine the specific needs of the communities the Bank serves, management held discussions with Community Development leaders in the Illinois AA while also considering detailed analysis of demographic data and studies performed by various government and non-governmental organizations for all three AAs, including the Community Credit Needs Statements prepared in connection with the Georgia and Ohio branch applications (see Section V).

b. Summary of Public Input and Plan Adjustments

Illinois AA: Bank management sought insights from community leaders and held discussions with the following community organizations to determine the financial needs of the Illinois AA as we developed this Plan. The information gathered in these discussions helped guide the goals incorporated herein. The specific organizations were:

Organization	Focus
Blackmen United Foundation – Rev. John Harrell, President – Bellwood, IL	Strives to create an alliance of African descent to empower communities through Economics, Safety and Spirituality.
Reach Community Development Corporation – Pastor Kenyatta Smith – Chicago, IL	Offers a wide range of services, including housing and financial education in support of underserved communities.
Inspire Coalition – Allen Mickle, President – Country Club Hill, IL	Supports individuals affected by socio-economic challenges or violence with job training, career placement, and mentoring.
Total Resources Community Development Organization – Bishop Simon Gordon – Chicago, IL	Part of the Illinois Housing Development Authority, focused on assisting people with home ownership, financial literacy and prepurchase counseling.

Georgia and Ohio AAs: Because the Georgia and Ohio AAs were only recently approved (August 4, 2026), the Bank's community outreach in these two AAs is at an earlier stage than in Illinois. In lieu of completed interviews, the Bank prepared comprehensive, data-driven Community Credit Needs Statements for both new AAs (Appendices C and D), drawing on FFIEC, FHFA, CFPB, FDIC, and OCC CRA Performance Evaluation data, as well as published OCC community-contact findings from examinations of other institutions operating in these markets. Management has identified the following organizations as priority outreach targets, and – consistent with 12 C.F.R. § 25.27(d)(1), which requires a bank to informally seek suggestions from members of the public in its assessment area(s) while developing the plan – the Bank commits to completing informal outreach to these organizations in the Georgia and Ohio AAs prior to submitting this Plan for formal OCC approval:

Organization	AA / Focus
Economic & Community Development Institute (ECDI)	Ohio AA – CDFI serving Cleveland, Akron, and Canton; small business and microloan credit for minority-, women-, and immigrant-owned businesses.
Bank On CLE Coalition	Ohio AA – Coalition of banks and credit unions connecting unbanked Cleveland-area residents to no-fee, Bank On-certified deposit accounts.
Buckeye State Credit Union / Western Reserve Community Fund	Ohio AA – CDFI-designated small business and working-capital lenders in the Akron market.
Community Foundation for Greater Atlanta	Georgia AA – Administers the GoATL and TogetherATL affordable-housing loan and grant funds.
HUD-Approved Housing Counseling Agencies (Atlanta metro)	Georgia AA – First-time homebuyer and pre-purchase counseling; referral partner contemplated under Section IX.A of the Bank's OCC branch response.

Feedback and data reviewed to date across all three AAs converge on a consistent set of needs: affordable home purchase and rehabilitation financing for LMI and first-time buyers, expanded access to mainstream deposit services for unbanked and underbanked households, and community development finance supporting affordable housing and small business credit. The Plan incorporates this feedback through the measurable goals set forth in Section VIII.

IV. Assessment Area

Pursuant to 12 C.F.R. § 25.41, the Bank has designated three Assessment Areas, presented below in the order in which they were established: (1) Illinois – Cook and Will Counties, based on the Bank's original headquarters in Palos Heights; (2) Georgia – a six-county portion of the Atlanta-Sandy Springs-Roswell MSA, based on the Bank's Alpharetta branch; and (3) Ohio – a ten-county portion of the Cleveland-Akron-Canton CSA, based on the Bank's Uniontown branch. Each AA is drawn to encompass whole counties constituting contiguous Metropolitan Statistical Areas or Metropolitan Divisions, without arbitrarily excluding low- or moderate-income geographies. Appendix A contains maps of each of the Bank's three designated AAs.

State / AA	Branch Office	AA Counties	MSA / MD
Illinois	Palos Heights, IL (existing) – 12330 S. Harlem Ave.	Cook County, Will County	Chicago-Naperville-Elgin MSA (16980)
Georgia	Alpharetta, GA (approved 8/4/2026) – 318 Maxwell Rd, Suite 200	Fulton, DeKalb, Forsyth, Gwinnett, Cherokee, Cobb	Atlanta-Sandy Springs-Roswell MSA (12060)
Ohio	Uniontown, OH (approved 8/4/2026) – 1790 Town Park Blvd, Suite J	Summit, Portage, Stark, Carroll, Cuyahoga, Lorain, Lake, Medina, Geauga, Ashtabula	Cleveland-Elyria (17460) • Akron (10420) • Canton-Massillon (15940) MSAs

a. Illinois Assessment Area – Cook and Will Counties

Cook and Will Counties, Illinois, present a diverse and economically varied demographic profile for Community Reinvestment Act purposes. As part of the Chicago Metropolitan Statistical Area ("MSA"), these two adjacent counties differ significantly in scale and composition.

Cook County Demographics

- Population and Density: Total population is approximately 5.19 million. The county is highly dense, particularly in the city and inner suburbs.
- Census Information: Per the Bank's 2026 FFIEC Census Report, Cook County contains 1,332 census tracts: 225 Low-income, 351 Moderate-income, 369 Middle-income, 371 Upper-income, and 16 with no assigned income – 576 tracts (43.2%) are LMI.
- Race and Ethnicity (2023 Estimates): White (Non-Hispanic) ~40.5%; Black or African American (Non-Hispanic) ~22.1%; Hispanic or Latino (of Any Race) ~26.5%; Asian (Non-Hispanic) ~7.7%.
- Housing: Homeownership rate is about 57.5%. Over 42% of Chicago-area households pay more than 30% of income on housing costs (FFIEC / Illinois Policy Institute).
- Foreign-Born Population: Approximately 21.3% of residents are foreign-born.

Will County Demographics

- Population and Density: Approximately 719,000 residents as of 2026 (approximately 39% population growth since 2000).
- Census Information: 172 Census Tracts, per the Bank's 2026 FFIEC Census Report: 6 Low-income, 32 Moderate-income, 64 Middle-income, 68 Upper-income, and 2 with no assigned income – 38 tracts (22.1%) are LMI.
- Race and Ethnicity (2023 Estimates): White (Non-Hispanic) ~59.8%; Hispanic or Latino ~19.3%; Black or African American ~11.5%; Asian ~6.0%.
- Housing: Higher homeownership rate than Cook County; 1.5–2 months' supply of homes; 25% of homeowners and 40% of renters are housing cost-burdened.
- Foreign-Born Population: Approximately 13.0% of residents.

CRA Context and Key Differences

Characteristic	Cook County	Will County	CRA Significance
Racial Diversity	High	Moderate	Cook County requires a strong focus on serving minority populations and historically underserved communities.
Population Density / Growth	High / Stable-Declining	Lower / High Growth	Will County needs mortgage and consumer lending for new housing; Cook County needs revitalization financing.
Poverty Rate	Higher	Lower	Highlights critical need for services and investments in LMI tracts within Cook County.

b. Georgia Assessment Area – Six-County Atlanta MSA

The Georgia AA encompasses Fulton, DeKalb, Gwinnett, Cobb, Cherokee, and Forsyth Counties within the Atlanta-Sandy Springs-Roswell MSA (12060), the sixth-largest MSA in the United States with approximately 6.4

million residents. The AA spans two components of the MSA – the Atlanta-Sandy Springs-Roswell MD (12054) and the Marietta MD (31924).

County	MSA / MD	2025 FFIEC MFI	Moderate-Income Threshold (<80% MFI)
Fulton County	Atlanta MD (12054)	$110,700	<$88,560
DeKalb County	Atlanta MD (12054)	$110,700	<$88,560
Forsyth County	Atlanta MD (12054)	$110,700	<$88,560
Gwinnett County	Atlanta MD (12054)	$110,700	<$88,560
Cherokee County	Marietta MD (31924)	$122,500	<$98,000
Cobb County	Marietta MD (31924)	$122,500	<$98,000

Note: the MFI figures above are the 2025 FFIEC-estimated median family income figures used to classify borrower income under HMDA/CRA. The census-tract income distribution tables below use a separate figure – the 2020 Census-based MSA/MD median family income – which is the applicable benchmark for classifying tract income under the FFIEC's 2024–2026 census tract cycle. The two figures are not directly comparable.

Georgia AA Census Tract Income Distribution

MSA / MD	Code	MFI	Total Tracts	Low	Mod	Mid	Upper	Unk.	LMI %
Atlanta-Sandy Springs-Roswell	12054 (MD)	$81,951	798	71	158	189	336	44	28.7%
Marietta	31924 (MD)	$91,140	242	11	39	97	94	1	20.7%
Georgia AA Total	—	$86,546 (avg.)	1,040	82	197	286	430	45	26.8%

Source: AA Census Tract Income Level Distribution (Appendix F).

Fulton County contains both affluent North Fulton census tracts (near the Alpharetta branch) and LMI tracts in South Fulton; DeKalb County is the most LMI-dense county in the Georgia AA (35.5% LMI). Forsyth County is the least LMI county in the entire combined portfolio (2.1% LMI), reflecting its position as one of the wealthiest counties in Georgia.

Racial homeownership gap: The Community Foundation for Greater Atlanta reports a Black-white homeownership gap of 26.9 percentage points in metro Atlanta (Black 48.7% vs. white 75.6%) – the widest in more than 50 years. Institutional investors accounted for approximately 30% of recent single-family purchases in Metro Atlanta, concentrated most heavily in DeKalb County, displacing LMI owner-occupant buyers. Approximately 51% of the City of Atlanta's population is Black and more than 20% of Gwinnett County's population is Hispanic, populations with above-average unbanked/underbanked rates (10.6% and 9.5% nationally, respectively, versus 1.9% for white households, per FDIC 2023).

c. Ohio Assessment Area – Ten-County Cleveland-Akron-Canton CSA

The Ohio AA encompasses ten counties within the Akron (MSA 10420), Canton-Massillon (MSA 15940), and Cleveland (MSA 17410) Metropolitan Statistical Areas, collectively part of the Cleveland-Akron-Canton, OH Combined Statistical Area (CSA 184), home to approximately 2.7 million residents.

County	MSA	2025 FFIEC MFI	Moderate-Income Threshold (<80% MFI)
Summit County	Akron (10420)	$100,300	<$80,240
Portage County	Akron (10420)	$100,300	<$80,240
Stark County	Canton-Massillon (15940)	$86,500	<$69,200
Carroll County	Canton-Massillon (15940)	$86,500	<$69,200
Cuyahoga County	Cleveland (17410)	$98,200	<$78,560
Lorain County	Cleveland (17410)	$98,200	<$78,560
Lake County	Cleveland (17410)	$98,200	<$78,560
Medina County	Cleveland (17410)	$98,200	<$78,560
Geauga County	Cleveland (17410)	$98,200	<$78,560
Ashtabula County	Cleveland (17410)	$98,200	<$78,560

Note: as with the Georgia AA table above, the MFI figures shown here are the 2025 FFIEC-estimated median family income figures used for borrower income classification and differ from the 2020 Census-based tract MFI figures used in the census tract income distribution table below.

Ohio AA Census Tract Income Distribution

MSA	Code	MFI	Total Tracts	Low	Mod	Mid	Upper	Unk.	LMI %
Cleveland-Elyria	17410 (MSA)	$75,548	660	87	144	221	182	26	35.0%
Akron	10420 (MSA)	$76,842	176	22	39	66	45	4	34.7%
Canton-Massillon	15940 (MSA)	$70,028	97	8	17	49	23	0	25.8%
Ohio AA Total	—	$74,139 (avg.)	933	117	200	336	250	30	34.0%

Source: AA Census Tract Income Level Distribution (Appendix F).

Cuyahoga County (Cleveland) is the dominant LMI geography in the Ohio AA: with 428 tracts and a 42.5% LMI rate, it contains 182 LMI tracts – 65.8% of all Ohio low-income tracts. Ashtabula County carries the highest LMI rate in the Ohio AA at 48.3%. The City of Cleveland has a homeownership rate of only 41.7% (vs. 70% statewide) and a median property value of approximately $102,000 (vs. $332,700 nationally).

Ohio's combined 34.0% LMI tract rate is materially higher than Georgia's 26.8% rate – a 7.2 percentage-point gap reflecting the legacy industrial, post-recessionary character of Northeast Ohio relative to the more affluent northern Atlanta suburban corridor. This is consistent with UTB's existing HMDA lending data, in which Ohio in-AA originations show a materially higher LMI-borrower share (48.5%) than Georgia in-AA originations (12.9%).

d. Combined Assessment Area Summary

State	Total Tracts	Low	Moderate	Middle	Upper	Unknown	LMI Tracts	LMI Rate
Illinois (Cook + Will)	1,504	231	383	433	439	18	614	40.8%
Ohio (10 counties)	933	117	200	336	250	30	317	34.0%

State	Total Tracts	Low	Moderate	Middle	Upper	Unknown	LMI Tracts	LMI Rate
Georgia (6 counties)	1,040	82	197	286	430	45	279	26.8%
Combined – All Three AAs	3,477	430	780	1,055	1,119	93	1,210	34.8%

All figures are drawn from the Bank's 2026 FFIEC Census Report and Exhibit B – AA Census Tract Income Level Distribution (Appendix F).

The Bank confirms that each of its three Assessment Areas complies with regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

V. Community Needs

a. Illinois AA

Based on the key demographic data noted above, housing affordability is a key issue. UTB has spent considerable time with the leaders of community development organizations to understand the needs of the local community. Based on these meetings, we have determined that the following are the top needs: Financial Literacy Training, especially as it relates to buying and maintaining a consumer's first home; facilitating deposit and check cashing services to help alleviate the costs of predatory non-bank financial services providers; and downpayment assistance for first-time homebuyers.

These findings are supported by additional analysis. According to findings in the 2025 Chicago Trends Report, published by the Financial Health Network in January 2026, the financial health, and therefore needs for credit, vary greatly in the Chicagoland area. Cook County has a wide variation in terms of financial health, with 13.3% living below the federal poverty line. The report notes that a primary credit need in both counties is access to affordable mortgage financing to combat high housing costs, as well as a need for mainstream financial services among unbanked and underbanked residents to reduce reliance on predatory lenders.

As of June 2025, one-fifth of credit-visible Chicagoans had subprime credit scores (≤ 600), another fifth had near-prime scores (601–660), and the remainder had prime or above (≥ 661); over 40% of the AA population is either near- or sub-prime, requiring UTB to seek non-conventional lending solutions to meet the credit needs of the population base. These findings are addressed in greater detail in the Bank's Community Credit Needs Statement – Illinois (Appendix C).

b. Georgia AA

The Georgia AA's primary credit needs, as documented in the full Community Credit Needs Statement (Appendix E), are:

- Residential purchase mortgage credit for LMI and minority households – purchase loans constitute 76.6% of UTB's in-Georgia-AA originations; the metro's median home sale price of $416,000 remains out of reach for LMI households, and the racial homeownership gap of 26.9 percentage points is the widest in more than 50 years.
- LMI household access within an affluent market – 31.3% of AA census tracts carry LMI designations; UTB's current in-AA Georgia lending is 12.9% LMI by borrower count.

- Community development finance for affordable housing – metro Atlanta faces a shortfall of approximately 132,000 affordable rental units, with average one-bedroom rent up 59.5% from 2019 to 2024.
- Small business and minority business credit – OCC community contacts specifically identify start-up financing and minority/immigrant entrepreneur credit access as primary needs; Gwinnett County (fast-growing Hispanic business community) is a particularly high-need geography.
- Financial inclusion for unbanked and underbanked households – Black households (10.6%) and Hispanic households (9.5%) have unbanked rates far above white households (1.9%), and both populations are heavily represented in the Georgia AA.
- Deposit services for existing UTB mortgage customers – UTB has originated 124 in-AA Georgia mortgage loans with no corresponding deposit relationship; branch approval converts these into full banking relationships.

c. Ohio AA

The Ohio AA's primary credit needs, as documented in the full Community Credit Needs Statement (Appendix D), are:

- Home purchase mortgage credit for LMI and first-time buyers – rising home prices against stagnant lower-income wages have compressed affordability; the Akron MSA FHFA House Price Index rose 5.2% year-over-year through Q4 2025.
- Veteran homebuyer programs – VA-guaranteed loans represent 45.5% of UTB's in-Ohio-AA originations, reflecting genuine demand from the region's veteran population.
- Financial inclusion and banking access – the Cleveland-Elyria MSA unbanked rate more than doubled from 2.0% (2021) to 5.4% (2023), reversing a decade of improvement.
- Home rehabilitation and improvement credit – Northeast Ohio's housing stock is among the oldest in the nation; Summit County's Aging in Place home-modification program exhausted funding ahead of schedule in 2024.
- Community development and affordable housing finance – the OHFA FY26 Housing Needs Assessment documents a widening affordable rental supply gap across the three-MSA area.
- Small business credit access – CDFIs including ECDI and Buckeye State Credit Union document persistent small-business credit gaps for minority-, women-, and immigrant-owned enterprises.

VI. Housing Affordability

For CRA purposes, the Bank evaluates housing affordability across each AA by assuming that the average family can afford to spend a maximum of 30% of their income on housing-related expenses.

a. Illinois AA

The Federal Reserve Bank of St. Louis reports that the median home price in the Chicago MSA is $362,051 as of January 2026. Assuming a conventional loan of 80% of the purchase price ($289,641), at a fixed rate of 6% over

30 years, the borrower would pay $1,837 per month in principal and interest, plus an estimated $757 per month for taxes and insurance (Smart Asset), for a total of $2,594 per month.

The FFIEC-estimated Chicago MSA Median Family Income (MFI) was $117,400 for the period ending December 31, 2025, implying a maximum affordable housing expense of $2,935 per month for a median-income family. Median-income families can therefore generally afford median-priced homes, but affordability gaps remain significant for LMI households: a Moderate-Income family (50–80% of MFI, max. $93,920/year) faces a shortfall of at least $246 per month, and a Low-Income family (≤50% of MFI, max. $58,700/year) faces a shortfall of at least $1,127 per month for a median-value home.

b. Georgia AA

The median home sale price in metro Atlanta was $416,000 as of November 2024 (FMLS / Atlanta REALTORS®), with Fulton County recording a median sale price of $415,075 as of October 2025. Using the Atlanta MD FFIEC MFI of $110,700 (2025) and the same 30%-of-income affordability threshold, a median-income Atlanta family can support a maximum housing expense of approximately $2,768 per month ($33,210 per year), well below the payment implied by the metro median sale price at current mortgage rates. For a Moderate-Income Fulton/DeKalb/Gwinnett family (50–80% of the $110,700 MFI), affordable monthly housing expense is capped at approximately $2,214, widening the affordability gap considerably. The Federal Reserve Bank of Atlanta's Home Ownership Affordability Monitor Index confirms that metro Atlanta fell below its affordability threshold in March 2022 and had not recovered as of the most recent update.

c. Ohio AA

Statewide, the Ohio median home price reached $198,183 in 2024 – the highest on record – at a price-to-income ratio of 2.6x, the widest affordability gap since 2005 (OHFA FY26 Housing Needs Assessment). Using the Akron MSA FFIEC MFI of $100,300 and the Cleveland MSA FFIEC MFI of $98,200 (2025) and applying the same 30%-of-income threshold, a median-income Akron-area family can support approximately $2,508 per month in housing costs, and a median-income Cleveland-area family approximately $2,455 per month. For LMI households in the region – where median household income in the City of Cleveland is only approximately $40,801 – the affordability gap is severe, reinforcing the region's documented demand for FHA-insured, VA-guaranteed, and down-payment-assisted mortgage products.

VII. United Trust Bank's Strategy Requires Alternative Measurement Approach

As noted above, current management initiated steps to save the Bank in 2018 by bringing in new capital investment and by creating a residential lending program. To develop income that would help stabilize the Bank and create a sustainable future, management instituted a geographically diversified residential loan origination program. Management has ties to lenders who specialize in residential loan origination, called Mortgage Loan Originators ("MLOs"), who are trained and licensed to assist borrowers with loans secured by residential real property.

The majority of the Bank's MLOs are based in different geographies, with some historically operating out of Uniontown, Ohio; Tampa, Florida; Apollo Beach, Florida; Nashville, Tennessee; Alpharetta, Georgia; and Palos Heights, Illinois. As described in Section I.d, the Uniontown, Ohio and Alpharetta, Georgia locations have since been converted to full-service branches and are now included in the Bank's official AA footprint; the remaining

MLO locations in Florida and Tennessee are not deposit-taking locations and therefore remain outside the Bank's AA.

The strategy proved successful in terms of generating income for the Bank, and by 2021 the Bank realized its first year of profitability, which it has maintained since. The dilemma for "satisfactorily" meeting the CRA has historically come from the standard method of evaluating compliance with the regulation – the "in-and-out ratio" – because the Bank's geographic diversification of MLOs resulted in most originations occurring outside of the (then single-county) AA.

a. Impact of the Georgia and Ohio Branches on the In-and-Out Ratio

A management review of UTB's HMDA Loan Application Register ("LAR") documented 1,133 residential mortgage loans totaling $345,330,343 originated from April 1, 2025, through March 31, 2026, with significant concentrations in the (now-approved) Georgia AA and Ohio AA. The table below – drawn from the Bank's June 18, 2026, OCC submission – illustrates the direct, quantifiable improvement in in-AA performance created by the two new branches:

Assessment Area	Total HMDA Loans	In-AA Loans (Post-Branch Approval)	In-AA Volume	In-AA %
Georgia AA (approved)	182	124	$69,677,669	68.1%
Ohio AA (approved)	129	33	$7,040,661	25.6%
Illinois AA (existing)	49	20	$5,992,526	40.8%
Combined AA Total (All Three)	360	177	$82,710,856	49.2%

Source: HMDA LAR sample, Q2-2025 – Q1-2026

Prior to branch approval, the $69.7 million in Georgia originations and $7.0 million in Ohio originations shown above counted entirely as out-of-AA lending, because UTB had no branch or deposit-taking presence in either state. Approval of the branches converts this volume to in-AA status, materially improving the Bank's in-and-out ratio and providing an important foundation for the goals set forth in Section VIII.

To be clear, UTB does lend to LMI borrowers within its AAs. For example, in the first quarter of 2026, of the loans the Bank originated in the Illinois AA, all but one were made to LMI borrowers, representing just over $2.1 million in residential lending. Ohio in-AA originations show an even stronger LMI concentration, with 48.5% of in-Ohio-AA borrowers falling in the Low- or Moderate-income categories. Relative to the Bank's size, this reflects a substantial and sustained commitment to LMI lending across all three AAs.

VIII. CRA Strategic Plan

The CRA examination standards applicable to a bank situated like UTB may not adequately measure the Bank's CRA performance because so much emphasis is placed on having a majority of its loans within its AA. As demonstrated in Section VII, approval of the Georgia and Ohio branches materially improves this dynamic, but the Bank's residential lending staff remain geographically dispersed relative to its three AAs, presenting an ongoing strategic challenge to generate a majority of loans within the AAs solely through the standard in-and-out ratio test.

As part of the process of assessing the needs of the communities UTB serves and determining the goals for our Plan, we evaluated the CRA Strategic Plans of similarly situated financial institutions to compare their goals. We focused primarily on banks with limited geographic branch footprints but a widely dispersed lending area. The following chart lists the banks that we focused on:

Bank	Location	Size	Goal Descriptions
Medallion Bank	Utah	$2.5 billion	CD Loans & Investments | Cumulative CD L&I | CD Service Hours
Varo Bank, NA	Utah	$363 million	CD Loans & Investments | Bank Services in LMI Areas | CD Service Hours
VersaBank, NA	Minnesota	$754 million	CD Loans & Investments | CD Grants & Donations | CD Service Hours
First Century Bank, NA	Georgia	$1.1 billion	CD Loans & Investments | CD Grants & Donations | CD Service Hours
Erebor Bank, NA	Ohio	$424 million	CD Loans & Investments | CD Grants & Donations | CD Service Hours
SmartBiz Bank, NA	Illinois	$185 million	Distribution of Loans within AA | CD Loans & Investments | CD Service Hours

Consistent with regulatory requirements, the UTB CRA Strategic Plan includes:

- Measurable annual interim goals established separately for “Satisfactory” and “Outstanding” performance ratings for each of the five years of the Plan, consistent with 12 C.F.R. § 25.27(c)(1).
- A goal structure focused on home mortgage lending, consistent with the Bank’s predominant business line.
- An explicit definition of the AA employees used to calculate the Bank’s community development service hour goal.
- Approval subject to public input and regulatory consideration.

Pursuant to 12 C.F.R. § 25.27(f)(1)(i), the Bank’s measurable goals are designed collectively to help meet the credit needs of each Assessment Area – particularly the needs of low- and moderate-income geographies and low- and moderate-income individuals – through lending, investment, and services, as appropriate. Goal 1 addresses lending to LMI individuals through home mortgage credit and is set separately for each of the Bank’s three AAs (see the discussion under Goal 1 below) given the materially different LMI-borrower baselines across Illinois, Ohio, and Georgia. Goal 2 addresses both LMI individuals and LMI geographies through community development loans and qualified investments (including affordable housing, small business, and revitalization activities targeted to LMI census tracts). Goal 3 addresses the service component through community development service hours directed to organizations and initiatives serving LMI individuals and communities within the Bank’s AAs. Taken together, the three goals span all three statutory categories – lending, investment, and service – and address the needs of both LMI geographies and LMI individuals across each of the Bank’s three Assessment Areas individually, consistent with 12 C.F.R. § 25.27(c)(2) (permitting a single plan covering multiple assessment areas) and (f)(1)(i).

a. Goal 1 – Home Mortgage Lending to LMI Borrowers Within the Bank's AAs

UTB will measure this goal by comparing the number of home mortgage loans (home purchase, refinance, and home improvement loans, including loans originated and loans purchased) made within a given AA to LMI borrowers, against the total number of home mortgage loans made or purchased within that AA. Achieving the Satisfactory-level goal in a given year requires that no less than the applicable percentage of home mortgage loans made or purchased within an AA in that year be made to LMI borrowers; achieving the Outstanding-level goal requires meeting the higher applicable percentage.

Why This Goal Is Set Separately for Each Assessment Area

12 C.F.R. § 25.27(f)(1)(i) requires the Bank to specify measurable goals for helping to meet the credit needs of each Assessment Area covered by the Plan, particularly the needs of LMI geographies and LMI individuals. While 12 C.F.R. § 25.27(c)(2) permits a single strategic plan covering multiple Assessment Areas, the Bank's three AAs have materially different LMI-borrower baselines in its current HMDA data: Illinois and Ohio in-AA originations are already 45% and 48.5% LMI by borrower count, respectively, while Georgia in-AA originations are only 12.9% LMI, reflecting the Atlanta AA's fundamentally different market composition (2025 FFIEC MFI of $110,700–$122,500 and a median home sale price of $416,000, versus Illinois and Ohio AA MFIs in the $75,000–$100,000 range). A single blended, combined-AA target would allow strong Illinois and Ohio performance to mask a lack of improvement in Georgia, which would not satisfy the requirement to address the credit needs of each AA individually. The Bank has therefore set separate, AA-specific annual interim goals below, each calibrated to that AA's own baseline performance and realistic trajectory.

Table 1a: Illinois AA – Annual Interim Goals (Home Mortgage Loans to LMI Borrowers, % of In-AA Originations)

Illinois in-AA originations were already 45% LMI by borrower count in the most recent measurement period (10% Low, 35% Moderate), driven substantially by FHA and VA lending. The goals below set the Satisfactory floor at a level the Bank can sustain even with normal period-to-period fluctuation in a relatively small AA loan volume, while the Outstanding goal tracks close to the Bank's demonstrated current performance.

1/1 to 12/31	Satisfactory	Outstanding
2027	30.0%	37.5%
2028	32.0%	39.5%
2029	33.0%	40.5%
2030	34.0%	41.5%
2031	35.0%	42.5%

Targets subject to Board ratification prior to plan final approval by the OCC.

Table 1b: Ohio AA – Annual Interim Goals (Home Mortgage Loans to LMI Borrowers, % of In-AA Originations)

Ohio in-AA originations were 48.5% LMI by borrower count in the most recent measurement period, the strongest of the Bank's three AAs, reflecting the working-class demographic profile of the Akron-Canton-Cleveland corridor and a heavy concentration of VA lending (45.5% of in-AA originations). The goals below set a

Satisfactory floor with room for the Uniontown branch's ramp-up period, rising toward the Bank's current demonstrated performance level by the Plan's final year.

1/1 to 12/31	Satisfactory	Outstanding
2027	33.0%	40.5%
2028	34.0%	41.5%
2029	35.0%	42.5%
2030	36.0%	43.5%
2031	37.0%	44.5%

Targets subject to Board ratification prior to plan final approval by the OCC.

Table 1c: Georgia AA – Annual Interim Goals (Home Mortgage Loans to LMI Borrowers, % of In-AA Originations)

Georgia in-AA originations were only 12.9% LMI by borrower count in the most recent measurement period. This reflects the underlying composition of the six-county Atlanta AA – a materially higher-income market than the Bank's Illinois and Ohio AAs, with FFIEC MFIs of $110,700–$122,500, a median home sale price of $416,000, and only 31.3% of census tracts carrying an LMI designation. Holding Georgia to the same numeric target as Illinois or Ohio would not be a reasonable goal given this market composition, and the Bank has calibrated the goals below to reflect meaningful, sustained improvement from Georgia's current baseline rather than parity with the Bank's other two AAs. Improvement is expected to come primarily from continued FHA/VA emphasis and the maturation of the Bank's TPO channel (which only began originating in the Georgia AA in Q4 2025) into a broader cross-section of the AA's LMI census tracts, including South Fulton and southern DeKalb County. The Bank's broader commitment to Georgia's LMI and underserved communities is also addressed through Goal 2 (community development loans and qualified investments, including affordable housing and LIHTC-eligible activity) and through the Alpharetta branch's planned Commercial Lender position, which will originate small business and commercial credit in Georgia AA LMI census tracts – activity that is CRA-eligible under Goal 2 rather than this home-mortgage-focused Goal 1.

1/1 to 12/31	Satisfactory	Outstanding
2027	13.0%	20.5%
2028	14.0%	21.5%
2029	16.0%	23.5%
2030	18.0%	25.5%
2031	20.0%	27.5%

Targets subject to Board ratification prior to plan final approval by the OCC.

For informational purposes only, and not as a separate compliance metric, the Bank's combined three-AA LMI-borrower rate under the above AA-specific goals would be expected to progress from approximately 24% in 2027 to approximately 32% by 2031, weighted by each AA's current origination volume. The Bank's primary compliance measurement under this Plan, however, is the AA-specific performance shown in Tables 1a–1c above, consistent with 12 C.F.R. § 25.27(f)(1)(i).

b. Goal 2 – Community Development ("CD") Loans and Qualified Investments

The regulation requires that the Bank evaluate its goals against other similarly situated banks. As part of developing this Plan, we reviewed approved CRA Strategic Plans of smaller community banks with limited branch footprints and broader lending areas to compare their CD lending goals. For simplicity, we compare goals as a percentage of Average Assets (derived from the previous year-end Call Report) and combine loans and qualified investments into a single goal, since both represent the Bank's commitment to supporting the needs of LMI communities in its AAs.

Bank	Year 1	Year 2	Year 3	Year 4	Year 5
Medallion Bank	.40%/.60%	.40%/.60%	.40%/.60%	.40%/.60%	.40%/.60%
Varo Bank, NA	.20%/.30%	.30%/.40%	.40%/.45%	.40%/.50%	.50%/.60%
VersaBank	.30%/.40%	.35%/.45%	.40%/.50%	.40%/.55%	.45%/.60%

The ranges for similarly situated banks are relatively consistent, with Satisfactory goals between 0.20% and 0.50% of Average Assets. At year-end 2025, UTB reported Average Assets of $167,354,000, resulting in a comparative investment of $334,708 to $836,800.

Given the clear need for housing support amongst the LMI communities across the Bank's now three AAs, and the levels of support demonstrated by similarly situated banks, UTB establishes an annual goal of loans and qualified investments to CD organizations of no less than 0.40% of Average Assets to be considered Satisfactory and 0.55% to be considered Outstanding by the final year of the Plan. This goal is first measured on an aggregate, Bank-wide basis across the Bank's combined Assessment Areas – that is, the percentage is calculated using total CD loans and qualified investments across Illinois, Georgia, and Ohio combined, divided by the Bank's total Average Assets – and is presented on that basis in Table 2 below. For internal monitoring and Board reporting purposes, the Bank additionally allocates the combined goal among its three AAs in proportion to each AA's share of the Bank's combined LMI census tracts (51% Illinois, 26% Ohio, and 23% Georgia, of 1,210 combined LMI tracts), as reflected in Tables 2a through 2c below. This AA-specific allocation is informational and directional, intended to guide the deployment of CD loans and qualified investments toward the AAs with the greatest concentration of LMI need; it does not create separate pass/fail sub-targets, and the Bank-wide aggregate in Table 2 remains the governing measure of the Bank's performance under this goal. The renewal of a loan or qualified investment is considered a new loan or investment; however, the Bank will only count one such renewal per year.

Table 2: Annual Interim Goals – CD Loans and Qualified Investments (% of Average Assets)

1/1 to 12/31	Satisfactory	Outstanding
2027	0.30%	0.40%
2028	0.35%	0.45%
2029	0.38%	0.50%
2030	0.40%	0.53%
2031	0.40%	0.55%

Targets subject to Board ratification prior to plan final approval by the OCC.

Tables 2a through 2c below present the informational AA-specific allocation of the combined goal described above, derived by applying each AA's share of the Bank's 1,210 combined LMI census tracts (51% Illinois, 26% Ohio, 23% Georgia) to the Bank-wide Satisfactory and Outstanding targets in Table 2.

Table 2a: Illinois AA – Annual Interim Goals (CD Loans and Qualified Investments, % of Average Assets)

1/1 to 12/31	Satisfactory	Outstanding
2027	0.15%	0.18%
2028	0.18%	0.21%
2029	0.19%	0.23%
2030	0.20%	0.25%
2031	0.20%	0.26%

Illinois AA allocation reflects 51% of the Bank's combined LMI census tracts. Targets subject to Board ratification prior to plan final approval by the OCC.

Table 2b: Ohio AA – Annual Interim Goals (CD Loans and Qualified Investments, % of Average Assets)

1/1 to 12/31	Satisfactory	Outstanding
2027	0.08%	0.10%
2028	0.09%	0.12%
2029	0.10%	0.13%
2030	0.10%	0.14%
2031	0.10%	0.14%

Ohio AA allocation reflects 26% of the Bank's combined LMI census tracts. Targets subject to Board ratification prior to plan final approval by the OCC.

Table 2c: Georgia AA – Annual Interim Goals (CD Loans and Qualified Investments, % of Average Assets)

1/1 to 12/31	Satisfactory	Outstanding
2027	0.07%	0.09%
2028	0.08%	0.10%
2029	0.09%	0.12%
2030	0.09%	0.12%
2031	0.09%	0.13%

Georgia AA allocation reflects 23% of the Bank's combined LMI census tracts. Individual AA goals are rounded to the nearest 0.01% of Average Assets and, in a given year, may sum to within ±0.01 percentage point of the Bank-wide aggregate shown in Table 2; the Bank-wide aggregate remains the governing measure of overall CRA performance. Targets subject to Board ratification prior to plan final approval by the OCC.

Loans and Investments to CDs include those activities that provide for affordable housing for LMI residents as well as services targeted to help LMI residents. Further, organizations that provide financing for small businesses and/or farms, or activities that revitalize LMI areas, will be included in eligible activities. Examples of organizations that will be considered for eligible loans and investments include:

- Community Development Financial Institutions, New Market Tax Credit-eligible Community Development Entities, Community Development Corporations, Minority- and Women-owned Financial Institutions, and Community Loan Funds that primarily lend in LMI areas or to LMI individuals (e.g., ECDI, Buckeye State Credit Union, and Western Reserve Community Fund in the Ohio AA).
- Organizations engaged in affordable housing rehabilitation and construction (e.g., the Community Foundation for Greater Atlanta's GoATL and TogetherATL funds in the Georgia AA).
- Organizations that specialize in economic development activities supporting small businesses and farms.
- Organizations that provide services to LMI individuals, such as youth programs, educational and financial literacy initiatives, homeless shelters, food banks and soup kitchens, battered women's shelters, health care centers, and recovery centers.
- Projects eligible for low-income housing tax credits (LIHTC), including LIHTC developments identified in the Bank's Ohio and Georgia Community Credit Needs Statements.
- State and municipal obligations, such as revenue bonds that support affordable housing projects.

The Bank is monitoring a pending regulatory proposal that would affect the definition and treatment of community development activities under this goal.[1]

c. Goal 3 – Community Development Service Hours

The Bank has adopted a permanent-home-address test to resolve the FTE-definition question described below – the same approach used by at least one peer institution reviewed in developing this Plan – because it is objective, auditable directly against HR system-of-record data, and functions across all three of the Bank's AAs.

Peer guidance suggests 2 hours per full-time employee for a small bank should be sufficient for a Satisfactory rating. Service hours are to be provided within the Bank's AAs. Our peer banks allocated a range of 2.5 to 5 hours per AA FTE for Satisfactory performance.

Definition of "AA Employees"

For purposes of this goal, "AA employees" are defined as full-time-equivalent employees whose permanent home address of record, as maintained in the Bank's human resources system as of December 31 of the preceding Plan year, is located within one of the Bank's three designated Assessment Areas: Cook or Will County, Illinois; the six-county Georgia AA (Fulton, DeKalb, Forsyth, Gwinnett, Cherokee, or Cobb County); or the ten-county Ohio AA (Summit, Portage, Stark, Carroll, Cuyahoga, Lorain, Lake, Medina, Geauga, or Ashtabula County) – regardless of the physical office location to which the employee reports or the state in which the

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[1] On July 31, 2026, the OCC and FDIC jointly issued a Notice of Proposed Rulemaking (OCC Bulletin 2026-35) proposing amendments to their CRA regulations. As relevant to this goal, the proposal would: (i) limit consideration of community development grants to those directly used for a plan, project, or initiative with community development as a primary purpose; (ii) codify an illustrative list of activities that do and do not qualify as community development, and provide a process to confirm that an activity qualifies; (iii) clarify the components of the principles-based definition of "community development" (affordable housing, community services targeted to LMI individuals, economic development, and revitalization or stabilization of targeted areas); and (iv) revise the strategic plan framework, including plan content and measurable-goals guidance, to make the strategic plan option "more viable and less burdensome" for community banks. The proposal would also raise the small bank asset threshold to $1 billion (from $412 million), under which UTB would remain classified as a small bank. The Federal Reserve did not join the proposal. Comments are due 60 days after publication in the Federal Register, and as of the date of this Plan the rule remains in proposed form and has not been adopted. No provision of this Plan relies upon or presumes the adoption of this proposal. The Bank will monitor the rulemaking and, consistent with Section VIII.g (Plan Amendment), will consult with the OCC regarding any amendment to this Plan that may be warranted if and when a final rule is adopted.

employee is licensed. This test is administered annually by Human Resources in coordination with the CRA Officer and provides an objective, auditable basis for the FTE count used to calculate the Bank's annual service-hour goal, consistent with the approach followed by other institutions operating under an approved CRA Strategic Plan. If employees located outside any AA (or employees of an affiliate) are used to perform service hours that benefit an AA, those employees are added to the AA FTE count for purposes of calculating the adjusted annual service-hour goal, consistent with the calculation methodology in Section VIII.c below.

UTB currently has 16 FTEs in the Palos Heights, Illinois office (its only office in the Illinois AA). With the addition of the Uniontown, Ohio branch (LPO conversion, plus 1–2 net new FTEs) and the Alpharetta, Georgia branch (existing administrative staff plus approximately 2–3 net new FTEs, including a dedicated Commercial Lender), the Bank's AA-employee population will expand meaningfully across all three AAs. The remaining MLO staff located outside all three AAs (e.g., Florida and Tennessee) will continue to be excluded from the AA FTE count and could not reasonably provide community development service hours in accordance with CRA guidelines.

Table 3: Annual Interim Goals – Community Development Service Hours per AA FTE

1/1 to 12/31	Satisfactory	Outstanding
2027	2.0	3.5
2028	2.5	4.0
2029	3.0	4.5
2030	3.0	4.5
2031	3.0	4.5

Targets subject to Board ratification prior to final plan approval by the OCC. Hour goals for each year will be determined by the AA FTE count as of 12/31 of the preceding Plan year, using the definition set forth above.

Given the range of hours provided by peer banks, the Bank proposes a goal that phases from 2.0 hours per AA employee (Satisfactory) / 3.5 hours (Outstanding) in Plan Year 1, to 3.0 hours (Satisfactory) / 4.5 hours (Outstanding) by Plan Year 3, sustained thereafter – recognizing that the Georgia and Ohio branches will need time to build community-service relationships and program capacity in their new markets.

d. Informal Public Participation in Plan Development

As noted above, UTB leadership held discussions with community development clients in the Illinois AA to ascertain what assistance they needed from their bank. For one client, the Bank participates in Financial Literacy projects to assist minority groups in LMI areas in learning about the financial system and how they can better fully participate. For the Bank's other Illinois clients, they simply need full access to financial services, including loans. In the Georgia and Ohio AAs, consistent with 12 C.F.R. § 25.27(d)(1), the Bank will complete informal outreach to the priority organizations identified in Section III.b prior to submitting this Plan for formal OCC approval, and will document that outreach – including any suggestions received and resulting Plan adjustments – in the submission package provided to the OCC.

It is the Bank's intent to publish this Plan once it has received comments back from the OCC and made recommended revisions. The Bank will publish notice in the newspapers identified in Section II.c – the Chicago Tribune, the Atlanta Journal-Constitution, and the Akron Beacon Journal – to request public comment across all three AAs.

e. Response to Complaints about the Bank's CRA Performance

The Bank has never received a complaint about its CRA compliance. Further, the Bank has never received any written correspondence regarding its CRA compliance.

f. Alternative CRA Evaluation Method

If the Bank fails to substantially meet the measurable goals established for a "Satisfactory" rating, the Bank elects to be evaluated under the Small Bank CRA performance standards pursuant to 12 CFR § 25.26.

g. Plan Amendment

Should the Bank experience a material change in its business strategy, or add, remove, or materially revise an Assessment Area, during the term of this Plan, the Bank will consult with the OCC regarding whether an amendment to this Plan is necessary. If an amendment is required, the Bank will submit the amended Plan to the OCC for approval and, consistent with 12 C.F.R. § 25.27(d), will conduct any additional informal public outreach and formal public comment period applicable to the amendment.

IX. Conclusion

Management's efforts to stabilize and grow the Bank have succeeded. UTB has helped thousands of families around the country obtain financing for their home needs, and – with the addition of the Georgia and Ohio branches – is now positioned to reinvest a substantially greater share of its deposit and lending activity directly back into its three Assessment Areas. Management and the Board believe this Plan provides a sound and measurable framework for the Bank to continue meeting the objectives of the CRA.

Once approved, this Plan replaces the traditional small bank lending test based on the "in-and-out ratio" and supplements the Bank's existing efforts to comply with consumer protection regulations, such as Fair Lending, HMDA, and ECOA. UTB is not seeking an exemption of any kind from CRA compliance; the Bank believes this Plan preserves the CRA's intent while reflecting the realities of the Bank's business model, and provides for accountability through measurable, annually-tracked goals across all three of the Bank's Assessment Areas.

The Bank will continuously monitor its performance and adjust activities as needed to ensure responsiveness to community credit needs and adherence to this Plan.

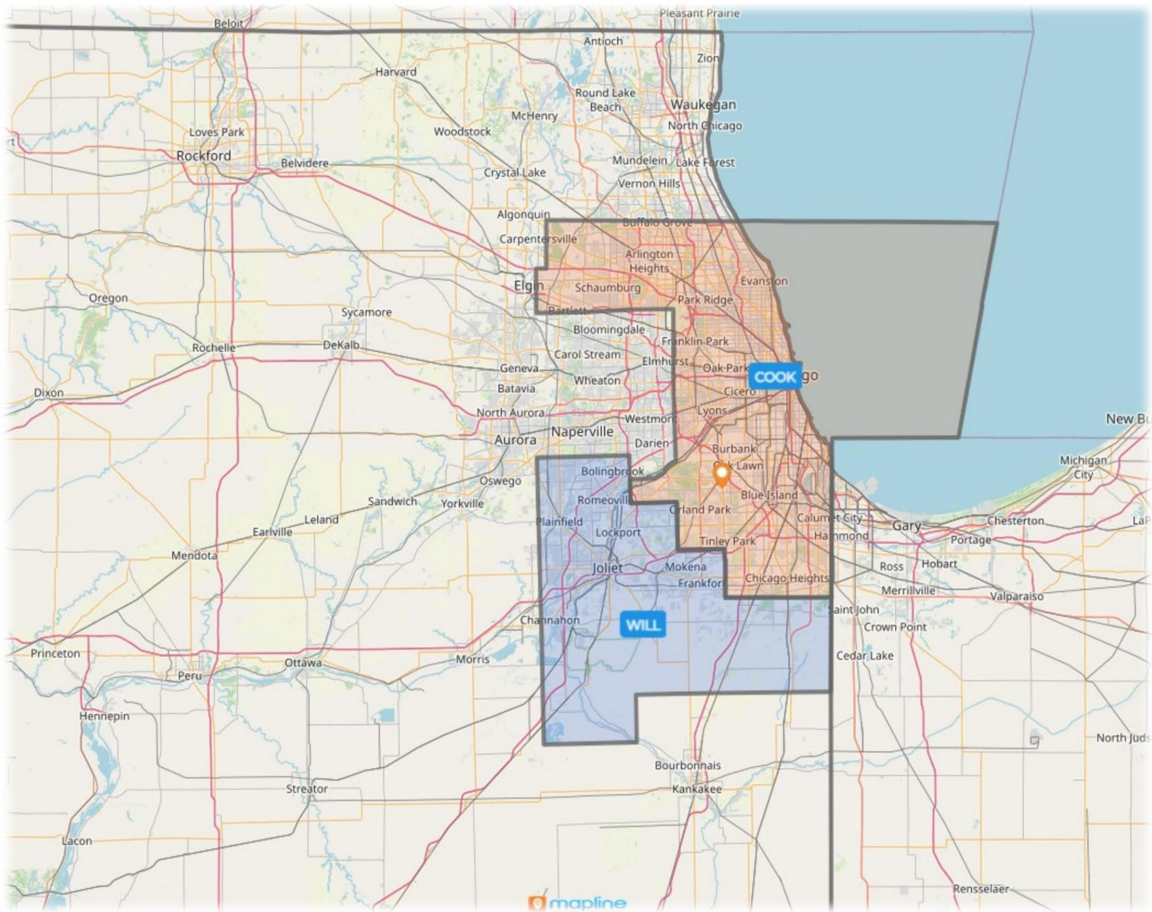
Request for OCC Approval

The Bank respectfully submits that it has structured this Plan to satisfy the requirements of 12 C.F.R. § 25.27, including the development process described in Section III, the measurable goals for each Assessment Area described in Section VIII, and the public participation process described in Sections II.c and VIII.d. The Bank respectfully requests that the OCC approve this Plan, and that the measurable goals set forth in Section VIII be approved as constituting "Satisfactory" and "Outstanding" performance, respectively, consistent with 12 C.F.R. § 25.27.

Appendix A – Assessment Area Maps

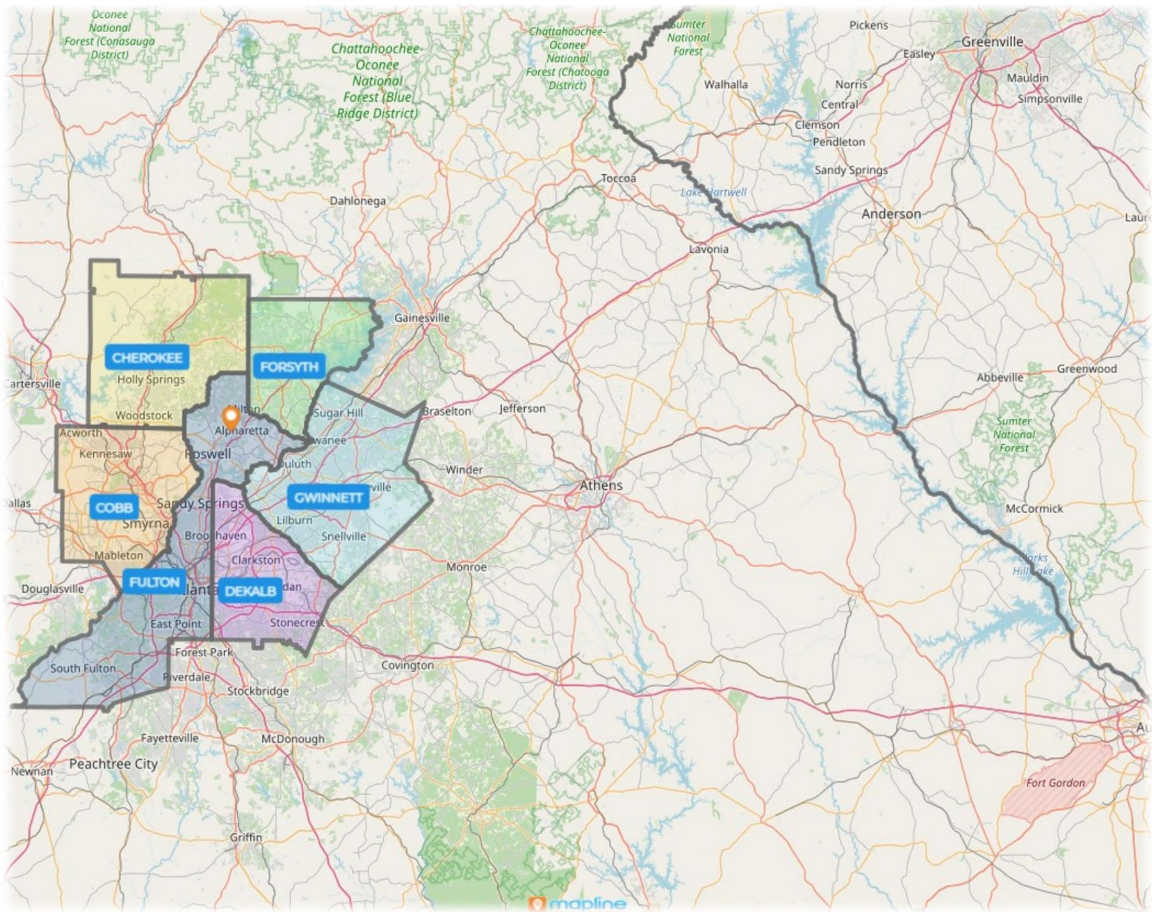
Illinois Assessment Area – Cook and Will Counties

Map produced using the Mapline visualization platform; source: U.S. Census Bureau county boundary files and OMB 2020 MSA delineations. The marker denotes the Palos Heights, IL branch office (12330 S. Harlem Ave.).



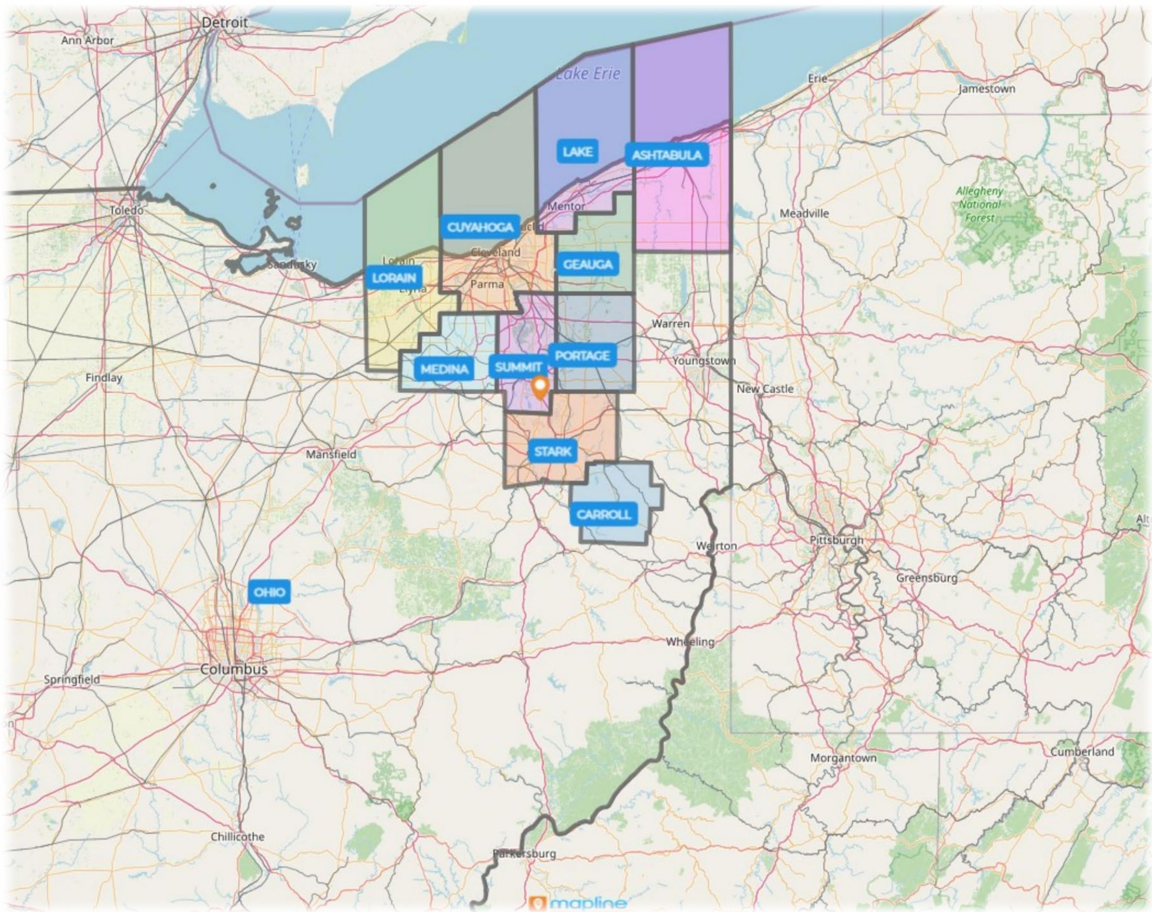
Georgia Assessment Area – Cherokee, Cobb, DeKalb, Forsyth, Fulton, and Gwinnett Counties

Map produced using the Mapline visualization platform; source: U.S. Census Bureau county boundary files and OMB 2020 MSA delineations. The marker denotes the Alpharetta, GA branch office (318 Maxwell Rd, Suite 200).



Ohio Assessment Area – Ashtabula, Carroll, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, Stark, and Summit Counties

Map produced using the Mapline visualization platform; source: U.S. Census Bureau county boundary files and OMB 2020 MSA delineations. The marker denotes the Uniontown, OH branch office (1790 Town Park Blvd, Suite J).



Appendix B – Proof of Publication

Public Notice

Community Reinvestment Act Strategic Plan

Public Comments Invited

Community Reinvestment Act ("CRA") regulations require a bank that has developed a CRA Strategic Plan (the "Plan") to publish a Notice of the Plan and solicit formal written public comment for at least a 30-day period. In conformance with this requirement, United Trust Bank (the "Bank") hereby provides notice of its intention to submit a CRA Strategic Plan to the Office of the Comptroller of the Currency (OCC), covering the Bank's Illinois, Georgia, and Ohio Assessment Areas. Written comments from the public concerning the Plan are encouraged. Individuals may request a copy of the Bank's CRA Strategic Plan at no charge by contacting Mike Mashke, Community Reinvestment Act Officer, by email at mmashke@utbhome.com, or by mail at 12330 S. Harlem Ave., Palos Heights, IL 60463. All written comments regarding the Plan should be directed to Mr. Mashke at the address listed above. Comments will be accepted for at least 30 days following publication, following which time the Plan will be submitted for approval to the OCC. The Bank will review all comments and incorporate suggestions into the Plan at its discretion.

This notice will be published in the Chicago Daily Law Bulletin (Illinois AA), the Alpharetta-Roswell Herald (Georgia AA), and the Akron Legal News (Ohio AA).

Appendix C – Community Credit Needs Statement – Illinois

Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (Cook and Will Counties)

Prepared August 2026 | Sources: FFIEC HMDA, FHFA HPI, CFPB, IHDA, FDIC, U.S. Census Bureau, OCC CRA Performance Evaluations, Chicago Urban League, Institute for Housing Studies (DePaul University)

Overview

The Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area, the nation's third-largest, is home to approximately 9.4 million residents. UTB's Illinois Assessment Area consists of Cook and Will Counties, which together account for approximately 5.9 million residents and constitute the core and southwestern growth corridor of the MSA. The AA's consumer credit landscape is defined by concentrated LMI census tracts in Cook County's urban core, one of the nation's most pronounced Black-white wealth and homeownership gaps, home prices and rents rising faster than incomes, an aging housing stock generating sustained rehabilitation credit demand, and elevated unbanked and underbanked rates among the AA's sizable Black and Hispanic populations. Mortgage credit for LMI and minority borrowers, financial inclusion products, home rehabilitation financing, and community development finance for affordable housing constitute the primary unmet credit needs across the AA.

Key Indicators – Two-County Assessment Area

Indicator	Value / Source
FFIEC Estimated MFI (Chicago-Naperville-Elgin MD, 2025)	$117,400 – HUD/FFIEC
Cook County Census Tracts / LMI Share	1,332 tracts; 576 (43.2%) LMI – Bank 2026 FFIEC Census Report
Will County Census Tracts / LMI Share	172 tracts; 38 (22.1%) LMI – Bank 2026 FFIEC Census Report
Median Home Sale Price – Cook County (Nov. 2025)	$350,000, +2.9% YoY – Redfin
Chicago MSA Median Home Price (Jan. 2026)	$362,051 – Federal Reserve Bank of St. Louis
Black-White Homeownership Gap (Chicago metro)	~28 points (44% Black vs. 72% White, 2022) – Chicago Urban League
Black-White Median Household Net Worth (Chicago metro)	$0 vs. $210,000 – Chicago Urban League / The New School
Cook County Households Below Poverty Line	13.3% – Financial Health Network, 2025 Chicago Trends Report

I. Housing and Mortgage Credit

Home purchase and refinance mortgage credit for LMI and minority households represents the most significant documented credit need in the Illinois AA. Cook County contains 1,332 census tracts, of which 576 (43.2%) carry LMI designations, concentrated in the City of Chicago's South and West Side community areas; Will County, by contrast, carries a lower LMI concentration of 38 of 172 tracts (22.1%), reflecting its faster-growing and comparatively higher-income suburban profile. As of November 2025, the median home sale price in Cook County reached $350,000, up 2.9% year-over-year (Redfin), while the Federal Reserve Bank of St. Louis reports a Chicago MSA median home price of $362,051 as of January 2026 – both well above what a Low- or Moderate-Income household earning at or below the area's FFIEC-estimated MFI of $117,400 can comfortably finance.

The racial homeownership and wealth gap is among the most significant documented community credit needs in the Illinois AA. The Chicago Urban League's 2025 "State of Black Chicago" report finds that Black homeownership in the City of Chicago stood at just 44% in 2022, compared to 72% for white households – a 28-percentage-point gap that has widened since 2012 (43% Black vs. 70% white) – and that the gap exceeds 30 percentage points at the statewide level. The report further finds that the typical Black family in the Chicago metropolitan area reports a median net worth of $0, compared to $210,000 for a typical white family, and that the racial gap in home values across Chicago-area neighborhoods has grown from approximately $50,000 in 1980 to more than $324,000 today.

Cook County's housing stock is among the oldest in the region and generates sustained demand for home improvement and rehabilitation financing. The Institute for Housing Studies at DePaul University finds that 71% of older Cook County homeowners live in houses built before 1990, and nearly 27% have lived in their home for 30 years or more; Cook County estimates that roughly two-thirds of suburban housing units were built before 1978, prompting the County's Lead-Safe Cook County program to fund lead remediation and related home repairs for qualifying low- and moderate-income households. Will County, having grown approximately 39% in population since 2000, presents a contrasting credit need: a tight 1.5-to-2-month supply of homes for sale, requiring purchase-money and new-construction mortgage credit to keep pace with demand.

II. Financial Inclusion and Banking Access

Financial Health Network's 2025 Chicago Trends Report finds that 13.3% of Cook County residents live below the federal poverty line and identifies mainstream financial services for unbanked and underbanked households – intended to reduce reliance on predatory check-cashing and payday lending – as a primary credit need across both AA counties. As of June 2025, one-fifth of credit-visible Chicagoans held subprime credit scores (≤600) and another fifth held near-prime scores (601–660); more than 40% of the AA population is near- or sub-prime, a segment generally underserved by conventional mortgage underwriting. Nationally, the FDIC reports Black and Hispanic household unbanked rates of 10.6% and 9.5%, respectively, versus 1.9% for white households (FDIC, November 2024) – rates directly relevant to the Illinois AA given that Black and Hispanic residents make up approximately 22.1% and 26.5% of Cook County's population.

III. Consumer Credit Conditions

The CFPB's 2025 Consumer Credit Card Market Report discloses that the average APR for general purpose credit cards reached 25.2% in 2024, and total consumer credit card debt exceeded $1.2 trillion nationally, conditions that compound the credit needs of the AA's sizable near- and sub-prime population. Illinois is home to 36 certified CDFIs, reflecting – and responding to – persistent gaps in small business and community development credit access for minority-, women-, and immigrant-owned enterprises throughout Cook and Will Counties.

IV. Community Development Finance

Affordable housing production remains a persistent statewide credit need: a November 2025 Impact for Equity analysis of Illinois Affordable Housing Planning and Appeal Act compliance found that over one-third of non-exempt local governments have not submitted a required Affordable Housing Plan to IHDA, and fewer than one-quarter of submitted plans were found compliant. Within the Illinois AA, Community Investment Corporation – a certified CDFI and the leading lender for acquisition, rehabilitation, and preservation of naturally occurring affordable rental housing in the Chicago metropolitan area – has provided $1.6 billion across 2,600 loans to preserve more than 66,200 affordable rental units since 1974, evidence of deep and sustained demand that exceeds what conventional lenders currently supply. The Chicago Community Loan Fund and IFF similarly provide flexible financing for community development projects throughout Cook and the collar counties, including Will.

Summary

- LMI census tracts concentrated in Cook County's urban core (576 of 1,332 tracts, 43.2%), with a materially lower concentration in Will County (38 of 172, 22.1%).

- A pronounced and widening racial homeownership and wealth gap – 44% Black vs. 72% white homeownership in Chicago (a 28-point gap, exceeding 30 points statewide) and a $0 vs. $210,000 median net worth gap between Black and white households.
- Rising home prices outpacing incomes, with Cook County's median home price reaching $350,000 (+2.9% YoY) against a $117,400 FFIEC MFI.
- An aging housing stock – 71% of older Cook County homeowners live in pre-1990 housing and roughly two-thirds of suburban units predate 1978 – driving sustained rehabilitation and lead-remediation credit demand.
- Elevated unbanked and underbanked rates among the AA's Black and Hispanic populations, compounded by a credit-visible population that is more than 40% near- or sub-prime.
- A persistent statewide affordable housing production shortfall and an active but capacity-constrained CDFI ecosystem serving small business and community development credit needs.

Data Sources: FFIEC HMDA Data Browser, Aggregate Reports, and Census Flat Files; FHFA House Price Index Datasets; Federal Reserve Bank of St. Louis; Redfin and Zillow Home Value Indices; Institute for Housing Studies at DePaul University; CFPB 2025 Consumer Credit Card Market Report; Illinois Housing Development Authority Annual Comprehensive Housing Plan and AHPAA Compliance Reports; Impact for Equity (November 2025); FDIC National Survey of Unbanked and Underbanked Households (2023); U.S. Census Bureau ACS 5-Year Estimates; OCC CRA Performance Evaluations; Chicago Urban League, "State of Black Chicago 2025"; Financial Health Network 2025 Chicago Trends Report; CDFI Coalition. Prepared by United Trust Bank, Mike Mashke, Credit Administration, August 2026.

Appendix D – Community Credit Needs Statement – Ohio

Cleveland-Elyria • Akron • Canton-Massillon Metropolitan Statistical Areas, Ohio

Prepared June 2026 | Sources: FFIEC HMDA, FHFA HPI, CFPB, OHFA, FDIC, U.S. Census Bureau, OCC CRA Performance Evaluations

Overview

The Cleveland-Elyria (17460), Akron (10420), and Canton-Massillon (15940) Metropolitan Statistical Areas, collectively constituting the Cleveland-Akron-Canton, OH Combined Statistical Area (CSA 184), are home to approximately 2.7 million residents across Cuyahoga, Lorain, Lake, Geauga, Medina, Summit, Stark, and Carroll Counties. The region's consumer credit environment is defined by concentrated LMI geographies in each urban core, a persistent racial homeownership gap wider than in any neighboring state, aging and undervalued housing stock, a reversal of the prior downward trend in the unbanked population, and constrained affordable housing supply. Mortgage and home improvement credit, financial inclusion products, and community development finance constitute the primary unmet credit needs across the combined statistical area.

Key Economic Indicators – Combined Statistical Area

Indicator	Cleveland-Elyria MSA	Akron MSA	Canton-Massillon MSA
LMI Census Tracts	Significant – Cuyahoga urban core	53 of 138 (38.4%)	25 of 90 (27.8%)
City Core Homeownership Rate	Cleveland: 41.7%	Akron MSA: 68.1%	Canton: ~45%
City Core Median Property Value (2024)	$102,000	$185,000–$213,000	~$105,000–$128,000
Unbanked Rate (2023, FDIC)	5.4% MSA (doubled since 2021)	Not separately reported	Not separately reported
Median Household Income (City Core)	Cleveland: ~$40,801	Akron: ~$48,076	Canton: ~$32,735
Families Below Poverty Level	Cleveland: ~30%	Akron: 18.4%	Canton-Massillon MSA: 9.6%

I. Housing and Mortgage Credit

Home purchase, home improvement, and home rehabilitation lending represent the most acute and broadly documented consumer credit need across all three MSAs. According to FHFA House Price Index data, home values in the Akron MSA rose approximately 5.2% year-over-year through Q4 2025 (index value 268.93, up from 255.56 in Q4 2024). Statewide, the Ohio median home price reached $198,183 in 2024 – the highest on record – at a price-to-income ratio of 2.6x, the widest affordability gap since 2005 (OHFA FY26 Housing Needs Assessment). The 30-year fixed mortgage rate averaged 6.7% in 2024 and has remained above 6% since September 2022, compressing purchasing power across the region.

LMI census tracts are significant in all three MSAs. Within the Akron MSA (Summit County), 53 of 138 census tracts carry LMI income designations – 22 low-income and 31 moderate-income. The Canton-Massillon MSA (Stark and Carroll Counties) includes 25 LMI tracts among 90 total; in low-income tracts within this MSA, unemployment rates reach 16.7% and the poverty rate exceeds 43% (OCC CRA Performance Evaluation, Consumers National Bank, August 2025). Within the Cleveland-Elyria MSA, the City of Cleveland's homeownership rate of 41.7% is far below both the Ohio statewide rate of 70% and the national rate of 65.2%.

The racial homeownership gap represents a significant and documented credit need: Ohio's Black homeownership rate stood at 36% as of 2021 – the lowest among neighboring Midwest states – compared to a white homeownership rate of 73%, a gap of 37 percentage points (OHFA FY24 Housing Needs Assessment). In Northeast Ohio, 17% of Black homeowners with mortgages spend more than half of their income on housing costs, versus just 8% of white mortgage holders.

Northeast Ohio's housing stock is among the oldest in the nation. The City of Cleveland's Repair-A-Home program – which provides below-market rehabilitation loans to owner-occupants ineligible for traditional financing – reflects chronic demand exceeding capacity. In Summit County, the Direction Home Aging in Place Program reported that both home care services and minor home modification funding were exhausted ahead of schedule in 2024.

II. Financial Inclusion and Banking Access

According to the FDIC's 2023 National Survey of Unbanked and Underbanked Households, the unbanked rate in the Cleveland-Elyria MSA was 5.4% – up from 2.0% in 2021 – with an additional 10.2% of households classified as underbanked. The Federal Reserve Bank of Cleveland's February 2026 Economic Commentary identifies minimum balance requirements, distrust of financial institutions, and fee structures as the primary barriers to banking access. Approximately 15% of Ohio bank branches closed between 2008 and 2020, with closures disproportionately concentrated in LMI urban neighborhoods and rural areas, contributing to banking service deserts.

III. Consumer Credit Conditions

The CFPB's 2025 Consumer Credit Card Market Report discloses that the average APR for general purpose credit cards reached 25.2% in 2024, and total consumer credit card debt exceeded $1.2 trillion nationally. CDFIs operating in the three-MSA area – including ECDI (Cleveland, Akron, and Canton), Buckeye State Credit Union (Akron), and Western Reserve Community Fund (Akron) – fill microloan and working capital credit needs for entrepreneurs who fall outside the underwriting parameters of traditional financial institutions.

IV. Community Development Finance

The OHFA FY26 Housing Needs Assessment identifies a widening gap between demand and supply of affordable rental units for low-income Ohioans. OHFA has made Low-Income Housing Tax Credit (LIHTC) reservations in the three-MSA region, including HUB 27 in Cleveland and The Heights in Akron (2024). The City of Cleveland allocated approximately $3.3 million in Housing Trust Fund resources in 2024 in support of affordable housing preservation and new construction.

Summary

- Significant LMI tract concentrations in each urban core, with unemployment in low-income tracts reaching 16.7% in the Canton-Massillon MSA and poverty rates exceeding 43% in low-income tract households.
- A racial homeownership gap of 37 percentage points in Ohio – the widest among neighboring states – with Black mortgage denial rates nearly double those of white applicants.
- Rising home prices against stagnant lower-end incomes, creating a price-to-income ratio of 2.6x at the statewide level.
- An aging housing stock requiring home rehabilitation and improvement financing, particularly for senior and low-income owner-occupants.
- A reversal of the declining unbanked trend in the Cleveland-Elyria MSA (5.4% unbanked in 2023, doubled since 2021), with 10.2% underbanked.
- Rising consumer credit stress, with credit card APRs averaging 25.2% nationally.
- A widening affordable rental housing supply gap and sustained demand for community development finance.

Data Sources: FFIEC HMDA Data Browser and Aggregate Reports; FHFA House Price Index Datasets; S&P Cotality Case-Shiller OH-Cleveland Home Price Index; CFPB 2025 Consumer Credit Card Market Report; Ohio Housing Finance Agency FY24/FY26 Housing Needs Assessments; FDIC National Survey of Unbanked and Underbanked Households (2023); U.S. Census Bureau ACS 5-Year Estimates (2019–2023); OCC CRA Performance Evaluations; Federal Reserve Bank of Cleveland; Harvard University Joint Center for Housing Studies. Prepared by United Trust Bank, Mike Mashke, Credit Administration, June 2026.

Appendix E – Community Credit Needs Statement – Georgia

Atlanta-Sandy Springs-Roswell, GA Metropolitan Statistical Area (12060)

Assessment Counties: Fulton • DeKalb • Gwinnett • Cobb • Cherokee • Forsyth | Prepared June 2026 | Sources: FFIEC HMDA, FHFA HPI, CFPB, FDIC, OCC CRA Performance Evaluations, Atlanta Regional Commission, Federal Reserve Bank of Atlanta, Georgia DCA, NLIHC, U.S. Census Bureau

Overview

The Atlanta-Sandy Springs-Roswell, GA Metropolitan Statistical Area (12060) encompasses 20 counties and ranks as the sixth largest metropolitan area in the United States, with a population of approximately 6.4 million. The six counties addressed in this statement – Fulton, DeKalb, Gwinnett, Cobb, Cherokee, and Forsyth – collectively account for the majority of the MSA's economic activity, residential lending, and community development needs. The MSA's consumer credit landscape is shaped by one of the nation's most severe affordable rental housing deficits, a persistent and widening racial homeownership gap, rapidly rising home prices and rents that have outpaced income growth, high institutional investor activity displacing owner-occupant buyers in LMI communities, and significant unbanked and underbanked populations.

Key Indicators – Six-County Assessment Area

Indicator	Value / Source
FFIEC Estimated MFI (MSA 12060, 2025)	\$110,700–\$122,500 (component MDs) – HUD/FFIEC
Median Housing Value (2020 Census, FFIEC)	\$271,779 – OCC CRA PE (2022–23 data)
LMI Census Tracts (2020 Census, 2022-23)	31.3% of CTs (9.6% low, 21.7% moderate) – OCC CRA PE
Median Home Sale Price – Metro Atlanta (Nov. 2024)	\$416,000 – FMLS / Atlanta REALTORS® Market Brief
Atlanta Metro Affordable Rental Housing Shortfall	132,000 units – Federal Reserve Bank of Atlanta
Black-White Homeownership Gap (Atlanta metro)	26.9% (highest in 50+ years as of 2021) – CFGA
Institutional Investor Share of SF Purchases	~30% metro Atlanta (2024) – Atlanta Civic Circle

I. Housing and Mortgage Credit

Per FHFA All-Transactions House Price Index data, the Atlanta MSA HPI reached 376.30 in Q4 2024, up 4.2% year-over-year. The median sale price for the 11-county metro reached \$416,000 in November 2024, with Fulton County recording a median sale price of \$415,075 as of October 2025. LMI census tracts are concentrated in the southern portions of Fulton County, central and southern DeKalb County, and southwestern Gwinnett County – the very areas with the highest concentrations of Black, Hispanic, and lower-income households. The assessed six-county AA contains 1,104 census tracts, of which approximately 346 (31.3%) carry LMI designations.

The racial homeownership gap is among the most prominent credit need indicators in the Atlanta MSA. The Community Foundation for Greater Atlanta reports that the Black-white homeownership gap in the metro area stands at 26.9 percentage points, the highest in more than 50 years, with Black homeownership at 48.7% versus white homeownership at 75.6% (2021). Per the 2025 National Fair Housing Alliance State of Equitable Homeownership Report, Black applicants nationally faced a 26.24% mortgage denial rate in 2024 versus 16.54% for white applicants.

A structural factor uniquely affecting the Atlanta housing market is the high concentration of institutional investor activity in single-family residential properties. Investment funds accounted for approximately 30% of recent single-family home purchases in Metro Atlanta in 2024, with DeKalb County the metro area's leading concentration point, directly overlapping with the county's highest-density LMI and majority-Black census tracts.

Metro Atlanta faces one of the most severe affordable rental housing shortfalls among major U.S. metros – approximately 132,000 units short (Federal Reserve Bank of Atlanta). More than half of renters in the metro area are cost-burdened, and average one-bedroom apartment rents rose 59.5% from 2019 to 2024.

II. Financial Inclusion and Banking Access

Racial disparities in banking access are pronounced and directly relevant to Atlanta's demographic profile: the unbanked rate for Black households nationally was 10.6% and for Hispanic households 9.5%, versus just 1.9% for white households (FDIC, November 2024). Given that Black residents constitute approximately 51% of the City of Atlanta's population, and Gwinnett County is home to one of the nation's largest and fastest-growing Hispanic immigrant communities (over 20% of Gwinnett's population), the above-average unbanked and underbanked rates among these demographic groups translate into a material concentration of financially underserved households within the assessed counties.

III. Consumer Credit Conditions

Small business credit access for minority-, women-, and immigrant-owned enterprises represents a specific and recurring need identified by multiple OCC community contacts across Atlanta-area CRA examinations. Gwinnett County, with one of the fastest-growing Hispanic business communities in the Southeast, represents a particularly high-need geography for small business credit.

IV. Community Development Finance

The affordable housing production deficit in metro Atlanta is among the most well-documented community development credit needs in the Sixth Federal Reserve District. The City of Atlanta has mobilized significant resources in response: a $100 million bond approved in 2023, the GoATL and TogetherATL funds managed by the Community Foundation for Greater Atlanta, and an Atlanta Housing authority FY2025 budget of $533.9 million. Despite these commitments, new apartment completions in Atlanta are projected to fall to approximately 8,400 units in 2026 – the lowest since 2014.

Summary

- A severe affordable rental housing shortfall of approximately 132,000 units, with more than half of renters cost-burdened and average one-bedroom rents rising 59.5% from 2019 to 2024.
- A persistent and widening racial homeownership gap of 26.9 percentage points between Black and white households – the highest in more than 50 years in metro Atlanta.
- Approximately 31.3% of census tracts designated LMI, concentrated in Fulton, DeKalb, and southern Gwinnett Counties.
- Above-average unbanked and underbanked rates arising from the region's large Black and immigrant Hispanic populations.
- Rising consumer credit stress and housing cost inflation compressing discretionary household budgets.
- Persistent small business credit gaps for minority-, women-, and immigrant-owned enterprises.

Data Sources: FFIEC HMDA Data Browser, Aggregate Reports, and Census Flat Files; FHFA House Price Index Datasets; CFPB Consumer Credit Card Market Report; OCC CRA Performance Evaluations (Embassy National Bank, TCM Bank, AB Bank); FDIC 2023 National Survey of Unbanked and Underbanked Households; U.S. Census Bureau ACS 5-Year Estimates; Federal Reserve Bank of Atlanta; Georgia Department of Community Affairs; Atlanta Regional Commission; Community Foundation for Greater Atlanta; National Fair Housing Alliance. Prepared by United Trust Bank, Mike Mashke, Credit Administration, June 2026

Appendix F – AA Census Tract Income Level Distribution

All assessment areas – Illinois, Georgia, and Ohio. 2024–2026 FFIEC Cycle (Georgia and Ohio); 2026 FFIEC Cycle (Illinois). Source: FFIEC Census Flat Files and the Bank's 2026 FFIEC Census Report.

This exhibit presents the complete census tract income level distribution for United Trust Bank's Illinois, Georgia, and Ohio Assessment Areas, as defined by FFIEC estimated median family income (MFI) classifications. Census tracts are classified into four income tiers based on the ratio of tract median family income to the MSA/MD median family income: Low-income (<50%), Moderate-income (50–79.9%), Middle-income (80–119.9%), and Upper-income (≥120%). Tracts with no assigned income are designated "Unknown" and excluded from LMI rate calculations.

I. Portfolio Overview

The Bank's combined Illinois, Georgia, and Ohio assessment areas encompass 3,477 census tracts across 18 counties. Of these, 1,210 tracts – 34.8% of the total – carry LMI income designations (Low or Moderate).

State	Total	Low	Mod	Mid	Upper	Unk.	LMI	LMI Rate	Avg. MFI
Illinois (IL)	1,504	231	383	433	439	18	614	40.8%	$118,900
Ohio (OH)	933	117	200	336	250	30	317	34.0%	$74,139
Georgia (GA)	1,040	82	197	286	430	45	279	26.8%	$86,546
TOTAL	**3,477**	**430**	**780**	**1,055**	**1,119**	**93**	**1,210**	**34.8%**	**—**

II. Distribution by MSA / Metropolitan Division

Assessment Area	Code	Type	MFI	Total	Low	Mod	Mid	Upper	Unk.	LMI %
Chicago-Naperville-Elgin, IL	16980	MSA	$118,900	1,504	231	383	433	439	18	40.8%
Cleveland-Elyria, OH	17410	MSA	$75,548	660	87	144	221	182	26	35.0%
Akron, OH	10420	MSA	$76,842	176	22	39	66	45	4	34.7%
Canton-Massillon, OH	15940	MSA	$70,028	97	8	17	49	23	0	25.8%
Atlanta-Sandy Springs-Roswell, GA	12054	MD	$81,951	798	71	158	189	336	44	28.7%
Marietta, GA	31924	MD	$91,140	242	11	39	97	94	1	20.7%
TOTAL	—	—	—	**3,477**	**430**	**780**	**1,055**	**1,119**	**93**	**34.8%**

III. Distribution by County

Ranked by LMI rate (descending). Counties with LMI rates ≥35% are shown in bold.

County	State	MSA / MD	Total	Low	Mod	Mid	Upper	Unk.	LMI Rate
Ashtabula	OH	Cleveland-Elyria	29	1	13	14	0	1	48.3%

County	State	MSA / MD	Total	Low	Mod	Mid	Upper	Unk.	LMI Rate
Cook	IL	Chicago-Naperville-Elgin	1,332	225	351	369	371	16	43.2%
Cuyahoga	OH	Cleveland-Elyria	428	77	105	114	109	23	42.5%
Summit	OH	Akron	138	22	31	43	39	3	38.4%
DeKalb	GA	Atlanta MD	203	24	48	49	73	9	35.5%
Gwinnett	GA	Atlanta MD	220	9	57	87	66	1	30.0%
Lorain	OH	Cleveland-Elyria	80	9	14	39	17	1	28.7%
Stark	OH	Canton-Massillon	90	8	17	42	23	0	27.8%
Fulton	GA	Atlanta MD	327	38	52	45	158	34	27.5%
Will	IL	Chicago-Naperville-Elgin	172	6	32	64	68	2	22.1%
Cobb	GA	Marietta MD	186	10	31	69	75	1	22.0%
Portage	OH	Akron	38	0	8	23	6	1	21.1%
Lake	OH	Cleveland-Elyria	60	0	10	29	20	1	16.7%
Cherokee	GA	Marietta MD	56	1	8	28	19	0	16.1%
Medina	OH	Cleveland-Elyria	42	0	2	16	24	0	4.8%
Forsyth	GA	Atlanta MD	48	0	1	8	39	0	2.1%
Geauga	OH	Cleveland-Elyria	21	0	0	9	12	0	0.0%
Carroll	OH	Canton-Massillon	7	0	0	7	0	0	0.0%

IV. Key County Observations

- Cook County (IL) is the dominant LMI geography in the combined three-state portfolio: 1,332 tracts, 43.2% LMI rate, 576 LMI tracts – 47.6% of all LMI tracts across Illinois, Georgia, and Ohio. Cuyahoga County (OH) is the dominant LMI geography within the Ohio AA specifically: 428 tracts, 42.5% LMI rate, 182 LMI tracts.
- Ashtabula County (OH) carries the highest LMI rate in the portfolio at 48.3% (14 of 29 tracts).
- Summit County (OH) presents a 38.4% LMI rate (53 of 138 tracts).
- DeKalb County (GA) is Georgia's most LMI-dense county at 35.5% (72 of 203 tracts).
- Forsyth County (GA) is the lowest-LMI county in the portfolio at 2.1%, reflecting its position as one of the wealthiest counties in Georgia.

Data Sources: FFIEC Census Flat Files, 2024–2026 cycle; U.S. Census Bureau 2020 Decennial Census and 2019–2023 ACS 5-Year Estimates; OMB Statistical Area Delineations, 2020. Income tier thresholds: Low = tract MFI < 50% of MSA/MD MFI; Moderate = 50–79.99%; Middle = 80–119.99%; Upper = 120%+. Prepared by United Trust Bank, Mike Mashke, Credit Administration, June 2026.