

WEST TOWN BANK & TRUST
Community Reinvestment Act Strategic Plan
AUGUST 10, 2018 – AMENDED FOR SALE OF NC BRANCHES
DECEMBER 7, 2018 – RESUBMITTED AMENDMENT
FEBRUARY 26, 2019 – RESUBMITTED AMENDMENT

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

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

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

AMENDMENT REQUEST SUMMARY

The Bank has sold its two North Carolina branches located in Winterville (Pitt County) and Edenton (Chowan County) North Carolina to its sister bank Sound Bank headquartered in Morehead City North Carolina. Since these locations represent two of the Bank’s three CRA assessment areas all with area specific goals it is necessary to amend the current CRA Strategic Plan. The lending and investment goals under the approved Plan are percentage based as compared to total assets and the community service hours are based on the number of Bank employees both of which (total assets and total bank employees) are based on December 31st results of the immediate preceding year. This will not change in the proposed amended Plan, however, the reduction of assets to total assets due to the sale of the branches will be the factor used to increase the goals for both the lending and investment tests in the remaining assessment area. For example, the Bank reduced its assets by 11.71% with the branch sale and for Plan years 2019-2021 the Bank will increase its goals by 11.71% in both the lending and investment tests as follows:

Branch Sale Asset Reduction and Goal Adjustment Summary - Exhibit 9

Branch Assets	\$	36,118,371							
Bank Assets as of 9-30-18	\$	308,498,188							
Reduction percentage		11.71%							
Adjustment Percentage		111.71%							
Lending Goals									
Prior Goals 2017-2018		1	3	6	7	8	9	10	11
P&O of home mortgages in low-income tracts		0.101%	0.203%	0.270%	0.520%	0.808%	1.095%	1.383%	1.670%
P&O of home mortgages in Moderate-income tracts		0.351%	0.701%	0.935%	1.059%	1.183%	1.307%	1.431%	1.555%
P&O of home loans to low-income borrowers		0.051%	0.102%	0.136%	0.180%	0.225%	0.269%	0.314%	0.358%
P&O of home loans to Moderate-income borrowers		0.132%	0.264%	0.352%	0.449%	0.546%	0.643%	0.740%	0.837%
P&O Small Bus Loans Low-income tracts		0.038%	0.075%	0.100%	0.116%	0.143%	0.169%	0.196%	0.222%
P&O Small Bus Loans Moderate-income tracts		0.225%	0.450%	0.600%	0.650%	0.800%	0.936%	1.072%	1.208%
P&O Loans to Small Business <\$1mm Annual Revenue		0.200%	0.400%	0.460%	0.500%	0.550%	0.610%	0.670%	0.730%
Adjusted Goals 2019-2021		1	3	6	7	8	9	10	11
P&O of home mortgages in low-income tracts		0.113%	0.226%	0.302%	0.581%	0.902%	1.223%	1.544%	1.866%
P&O of home mortgages in Moderate-income tracts		0.392%	0.783%	1.044%	1.183%	1.322%	1.460%	1.599%	1.737%
P&O of home loans to low-income borrowers		0.057%	0.114%	0.151%	0.201%	0.251%	0.300%	0.350%	0.400%
P&O of home loans to Moderate-income borrowers		0.147%	0.295%	0.393%	0.502%	0.610%	0.718%	0.827%	0.935%
P&O Small Bus Loans Low-income tracts		0.042%	0.084%	0.112%	0.130%	0.159%	0.189%	0.218%	0.248%
P&O Small Bus Loans Moderate-income tracts		0.251%	0.503%	0.670%	0.726%	0.894%	1.046%	1.198%	1.349%
P&O Loans to Small Business <\$1mm Annual Revenue		0.223%	0.447%	0.514%	0.559%	0.614%	0.681%	0.748%	0.815%
Investment Goals									
Prior Goals 2017-2018		1	3	6	7	8	9	10	11
New Investments		0.300%	0.350%	0.400%	0.450%	0.500%	0.550%	0.600%	0.650%
Outstanding Investment		0.700%	0.750%	0.800%	0.850%	0.900%	0.950%	1.000%	1.050%
Adjusted Goals 2019-2021		1	3	6	7	8	9	10	11
New Investments		0.335%	0.391%	0.447%	0.503%	0.559%	0.614%	0.670%	0.726%
Outstanding Investment		0.782%	0.838%	0.894%	0.950%	1.005%	1.061%	1.117%	1.173%

The two branches were sold in October of 2018 however the plan does not consider amending the testing methodology for this event and the 2018 Plan year and will be graded under the approved Plan without any adjustments.

The amended plan calls for the removal of the “State” test and the removal of the assessment area weighting as the Bank will only have one assessment area in Illinois. A more detailed review of grading the Bank for CRA purposes in Plan years 2019-2021 is outlined further in this amended Plan and accompanying exhibits.

I. INTRODUCTION: THE COMMUNITY REINVESTMENT ACT

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

Community development is an important element of the CRA. Community development targets community service to LMI individuals; encompasses affordable housing (including multifamily rental housing) for LMI individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize LMI geographies, designated disaster areas or distressed or underserved non-metropolitan middle-income geographies designated by the Board of Governors, FDIC and OCC.

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

Before the advent of developments such as online banking and access to credit from diversified financial services providers via the Internet, small banks like the Bank designated their Assessment Area based on the location of their full service banking offices and limited their lending efforts to these, often small, geographic areas. In the 39 years since the CRA was adopted, however, technology and modern financial systems have enabled small banks, including the Bank, to expand their operations beyond the limited geographic reach of their traditional banking locations.

As discussed in more detail later in this Strategic Plan, the Bank has, in the past eight years, developed a business strategy that focuses on making the Bank’s residential mortgage loan products available to individuals and families throughout the United States as well its commercial oriented Government Guaranteed Lending Department focused on SBA 7(a) and USDA B&I/REAP loans throughout the United States Department of Agriculture (“USDA”). This nationwide lending strategy is driven by the business operations and expertise of the investment groups that recapitalized the Bank (outlined below), portfolio diversification goals, lending opportunities (including low- and moderate-income lending) outside of the communities served by the Bank’s retail banking facilities, and the Bank’s mortgage banking and government

guaranteed lending operations that require lending volumes that exceed what can be originated in the Bank's primary Assessment Area of Cook County, Illinois alone. In view of the Bank's current business strategy, the Bank believes the CRA's small bank lending test does not adequately measure the lending performance of the Bank, which serves a wide range of customers throughout the country including LMI borrowers and LMI census tracts. As an alternative to the standard evaluation method, and as a result of changes adopted by the Bank, the Act permits the Bank to comply with the CRA by electing to implement an approved CRA Strategic Plan. Accordingly, the Bank has elected to operate under this Strategic Plan in order to satisfactorily fulfill its CRA obligations.

II. WEST TOWN BANK & TRUST HISTORY AND BUSINESS OVERVIEW

MISSION STATEMENT

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

This Mission Statement reflects the Bank's 90+ year history of providing financial services to its local communities, and will continue to serve as the framework for the Bank's implementation of this Strategic Plan.

HISTORIC PRESENCE AND EXPANDED CAPABILITIES

On January 1, 1922, the Bank opened its doors with a mission to serve the banking needs of families in the Cicero, Illinois community. For most of its history, the Bank grew slowly by providing traditional savings and deposit services to the residents of Cicero and a number of surrounding towns. The Bank's lending programs focused on conventional mortgage loans, home equity lines of credit and second mortgages to residents in the local communities served by the Bank that required a minimum of a twenty (20%) percent down payment or significant equity in the property. In 1999, the Bank opened its North Riverside, Illinois branch to expand its service area, and continued its focus on providing traditional banking and residential mortgage loan products. In 2014 the Bank commenced operations through its branch in Winterville, North Carolina and opened its Edenton, North Carolina branch in March 2016.

Effective August 31, 2014 the Bank converted from an Illinois savings bank to an Illinois state bank. On January 1, 2016 the Bank became a wholly owned subsidiary of West Town Bancorp, Inc., a North Carolina corporation, and a Federal Reserve Board approved bank holding company.

By 2009, the Bank had grown to \$60 million in assets – very small in comparison to most modern financial institutions. Rather than sell the Bank and have its offices become branches of a much larger regional or national bank, the Bank merged its operations with North Carolina

investors that shared its same commitment to the promotion of home ownership and entrepreneurial activities of small businesses. From 2009-2010, the Bank and the investors completed a series of private placement stock offerings and merger transactions, which significantly increased the Bank's capital and has allowed for expansion of banking and lending operations.

The past six years have been a time of growth and change for the Bank. December 31, 2017, the Bank's assets grew to \$336 million. The Bank's new investors have brought renewed energy and dedication to the Bank's historic operations. With new investor capital, the Bank has added modern banking services such as direct deposit, online banking, telephone banking, ATM and debit cards, and credit cards to its time-honored personal checking, savings and Certificate of Deposit offerings. Local business customers have also benefited from the Bank's addition of remote deposit capture, online banking, and merchant payment processing to the checking and deposit accounts traditionally available to neighborhood business and commercial customers. During this time, the Bank has remained dedicated to its core mission of providing personal and responsive service and banking products in a sound, cost-effective manner to enable the Bank's customers to achieve their personal financial objectives, home ownership goals and small business growth.

LENDING OPERATIONS, LOAN PROGRAMS AND PORTFOLIO COMPOSITION

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

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

While bigger banks primarily focus on larger customers, the Bank remains committed to meeting the banking and home ownership financing needs of individuals and families. The chart below summarizes the types and net value of loans held in the Bank's loan portfolio as of December 31, 2017:

Single family 1-4 unit residential closed-end loans secured by first lien	\$35,579,000	12.4%
Single family 1-4 unit residential closed-end loans secured by second lien	1,121	0.04%
Single family 1-4 unit residential open-end loans extended under revolving lines of credit secured by mortgages	9,636	3.4%
Consumer loans, including auto and installment	1,158,000	0.4%
Residential multifamily (5 or more units) secured by mortgages	1,999,000	0.7%

Other real estate secured loans, including construction, land development and commercial real estate loans	104,975,000	36.7%
Commercial, industrial and agriculture loans	125,283,000	43.8%

The Bank is also a provider of government guaranteed commercial loans through the Small Business Administration (“SBA”) 7(a) loan program nationally, the Business and Industrial (“B&I”) loan program and the Rural Energy for America Program (“REAP”) both sponsored by the USDA financing in qualifying rural area across the country. Traditionally the Bank’s primary focus has been solely to promote savings and home ownership but has since expanded this into small business lending as well with a national footprint. As a community bank, the Bank is dedicated to helping its customers realize the American dream of home ownership and facilitate small business ownership as the Bank believes this promotes neighborhood stability, strengthens local communities, and contributes to local economic growth in the areas that it serves.

III. REQUIRED ELEMENTS OF THE STRATEGIC PLAN

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

DELINEATION OF ASSESSMENT AREA – COOK COUNTY, ILLINOIS

The Bank historically designated Cook and DuPage Counties in Illinois, which are part of the Chicago – Naperville – Joliet, Illinois Metropolitan Statistical Area (“MSA”), as the Bank’s Assessment Area. Prior to the adoption of this Strategic Plan, the Bank identified an Assessment Area that extended beyond the communities traditionally served by the Bank’s banking offices due to the intense competition in the communities of Cicero and North Riverside. In the Cook County Assessment Area there are 3,031 offices of 226 different banking institutions providing banking and lending services. With the Bank’s increased lending authorities and capital added in 2009 & 2010, the Bank now believes it can effectively meet its lending goals in its Assessment Area with a wider array of lending products for both residential and commercial customers. The Bank’s original Strategic Plan (circa 2012) identified Cook County, Illinois as its sole delineated Assessment Area. With the establishment of the Bank’s branch office in Winterville, Pitt County, North Carolina in 2014, and its branch office in Edenton, Chowan County, North Carolina in 2016, the Bank applied and received approval for a new CRA Strategic Plan for 5 years (2017–2021) and to include Pitt County and Chowan County, North Carolina (Metropolitan Statistical Area –

Greenville, North Carolina Metro Area). The Bank has recently entered into a purchase sale agreement with its sister organization, Sound Bank, to sell both the Winterville and Edenton, North Carolina branch offices as they are in contiguous markets. This amended Strategic Plan contemplates the sale of both of the Bank's North Carolina branches resulting in a sole Assessment Area of Cook County Illinois for the Bank.

COOK COUNTY, ILLINOIS

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

In order to fulfill the Bank's affirmative obligation to help meet the credit needs of the local communities in Cook County, Illinois to be served by the Bank, particularly in low- and moderate-income area, representatives of the Bank contacted municipal officials and housing and social service providers throughout the Assessment Area with emphasis on outreach efforts in the Cicero, Berwyn and North Riverside communities. As a result of the Bank's discussions with municipal leaders and organizations active in these communities, the Bank determined that the recent economic climate has had a highly negative impact on housing gains made over the last ten years.

The economic picture for the Assessment Area is slowly improving, with small gains in the Cook County employment rates seen in recent months. Although the Assessment Area is now climbing out of recession, Cook County continues to struggle with high rates of unemployment and high foreclosure although the number of foreclosures has experienced a decline in the last few years.

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

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

RECENT MARKET CONDITIONS

Due to increasing distressed sales, housing supply continues to increase and put downward pressure on sale prices. Price stability has a direct relationship to the number of distressed sales and the unemployment rate in a neighborhood. In the Assessment Area market, distressed sales have accounted for a large percentage of transactions. Residential remodeling activity, however, is expected to increase, providing opportunities in Home Equity lending.

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

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

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

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

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

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

- **JUNIOR ACHIEVEMENT.** Junior Achievement is the world's largest organization dedicated to inspiring and preparing young people to succeed in a global economy. Representatives of the Bank participate in the Junior Achievement in an in school program where volunteers from the Bank present Junior Achievement curriculum to assist students who participate in the Junior Achievement program in understanding more about personal financing and budgeting.
- **NEIGHBORHOOD HOUSING SERVICES OF CHICAGO COMMUNITY BANKS PARTNERSHIP.** NHS Community Banks Partnership is a group of banking organizations committed to investing in neighborhood revitalization, affordable housing and community reinvestment. Valuable information on the Chicago

Area Housing Market was obtained from NHS and considered during development of this Strategic Plan.

- **THE CHILDREN’S CENTER OF CICERO AND BERWYN.** The Children’s Center of Cicero and Berwyn is a non-profit, registered charitable organization dedicated to providing high quality services and educational opportunities to low income families residing and working in Cicero, Berwyn and other bordering communities. The agency depends on grants, fundraising and donations. The Bank sees this organization as a potential opportunity to assist with economic stability in the community through grants and/or donation assistance.

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

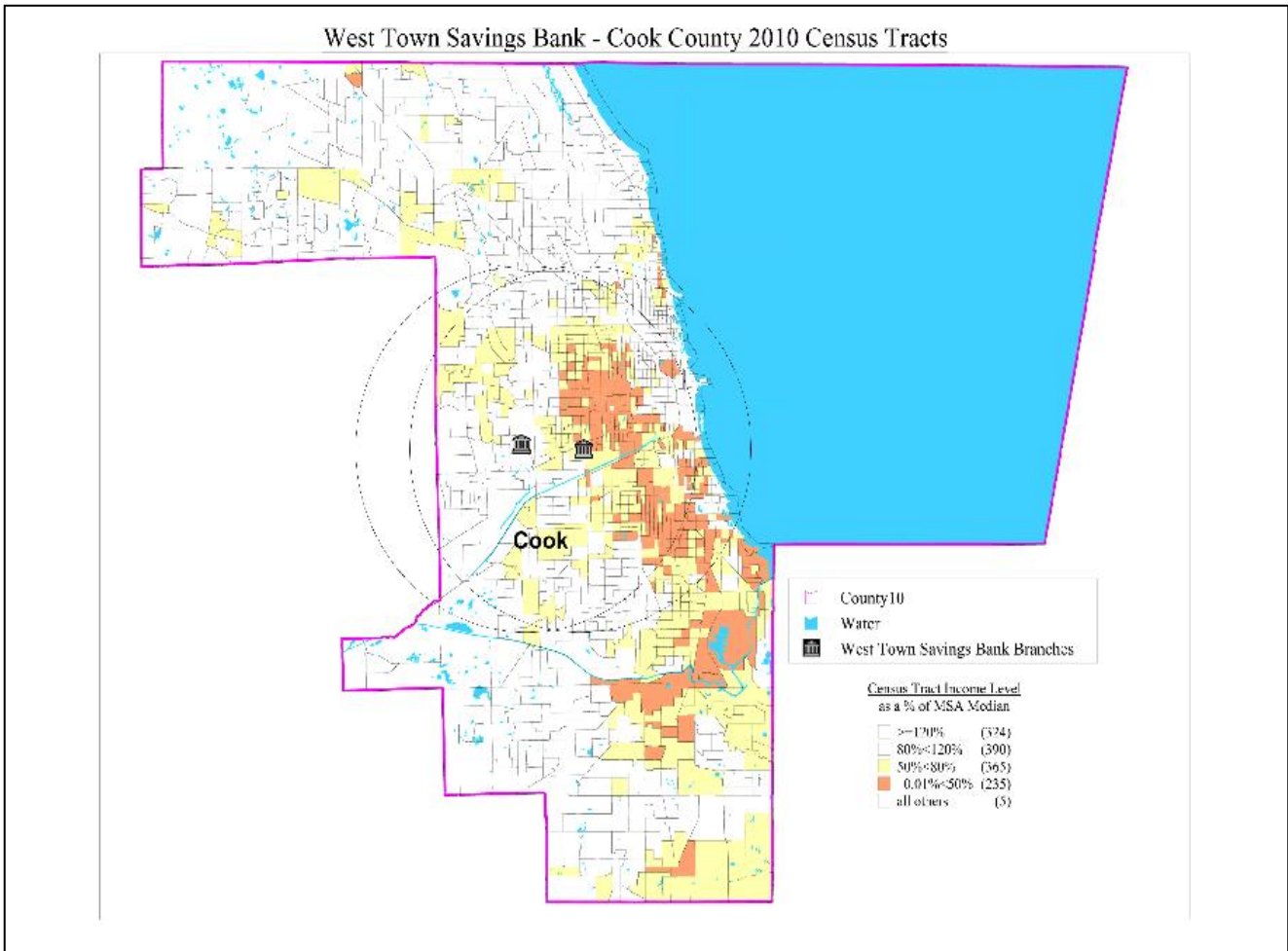
The Bank understands, however, that the credit and housing support needs of the Assessment Area will not remain static during the next five years, and changing economic conditions will present future opportunities for the Bank to meet the housing credit, community improvement and quality of life concerns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

OVERVIEW OF CHARACTERISTICS AND DEMOGRAPHICS OF THE COOK COUNTY ASSESSMENT AREA

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

Population data released from the 2010 U.S. Census indicates that more than 9,461,000 individuals reside in the Chicago – Naperville – Joliet, Illinois MSA, which covers more than 7,200 square miles. Of these, approximately 5,195,000 live in Cook County, which covers more than 945 square miles (*PCI Corporation, Inc. Data Source: 2010 US Census*). A list of census tracts included in the Assessment Area is attached as Exhibit “1” to this Strategic Plan, and an overview of the Bank’s Assessment Area is presented below:

DELINEATED ASSESSMENT AREA



As the overview of the Assessment Area census tracts indicates, significant differences in income levels are present within Cook County. The Assessment Area map is based on the weighted average median family income level for the Chicago – Naperville – Joliet, Illinois MSA that, for 2010, was estimated at \$72,329 (PCI Corporation, Inc. Data Source: 2010 US Census). For Cook County alone, for the period 2006-2010 (PCI Corporation, Inc. Data Source: 2010 US Census), the per capita median income was stated at \$29,335. Under the CRA, the census tracts are classified according to income codes defined as “upper-”, “middle-”, “moderate-” and “low-income”. Census tract classifications are important for evaluation of the Bank’s CRA performance because the purpose of the Act is to spur revitalization of low and moderate-income areas. In determining the income qualification for low-income (indicated in orange on the Assessment Area map), the CRA regulations define low-income as less than 50 percent of the area median family income, and moderate-income (indicated in yellow on the Assessment Area map) as income that is at least 50 percent but less than 80 percent of the area median family income. Data collected and compiled by the U.S. Census Bureau uses the same income qualification and terminology as that found in the CRA Regulations.

Population of the Cook County Assessment Area

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

DEMOGRAPHIC DETAIL – ASSESSMENT AREA – COOK COUNTY

(PCI Corporation, Inc. Data Source: 2010 US Census)

Tract Categories	Census Tracts		Total Population	
	#	%	#	%
Low Income	233	17.68	670,588	12.90
Moderate Income	362	27.47	1,482,560	28.53
Middle Income	390	29.59	1,696,962	32.66
Upper Income	329	24.96	1,344,565	25.88
NA	4	0.30	0	0.00
Total	1,318	100.00	5,194,675	100.00

Based on the 2010 Census estimates, 2,153,148 individuals, or 41.45% of the population of the Assessment Area, consist of LMI individuals who reside in a total of 595 census tracts in the Assessment Area. Low-income census tracts represent almost 18% of the total Assessment Area, where more than 670,000 individuals reside. The Assessment Area’s 362 moderate-income census tracts comprise more than 27% of all Cook County census tracts, with nearly 1.5 million inhabitants representing ample lending and investment opportunity for both residential and small business support activities. Combined, LMI individuals represent the largest demographic group in the Assessment Area.

FAMILIES AND HOUSEHOLDS IN THE COOK COUNTY ASSESSMENT AREA

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

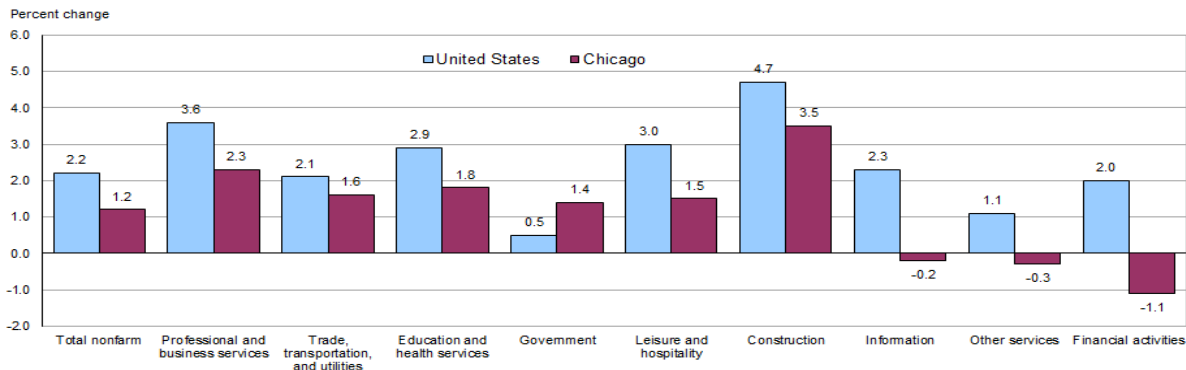
HOUSEHOLDS AND FAMILIES – ASSESSMENT AREA – COOK COUNTY

(PCI Corporation, Inc. Data Source: 2010 US Census)

Tract Categories	Census Tracts	Total Households		Households that are Families	
	#	#	%	#	%
Low Income	233	228,623	11.81	144,001	11.97
Moderate Income	362	505,174	26.09	332,030	27.59
Middle Income	390	651,162	33.62	410,034	34.07
Upper Income	329	551,522	28.48	317,356	26.37
NA	4	0	0	0	0
Total	1,318	1,936,481	100.00	1,203,421	100.00

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

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



Source: U.S. Bureau of Labor Statistics.

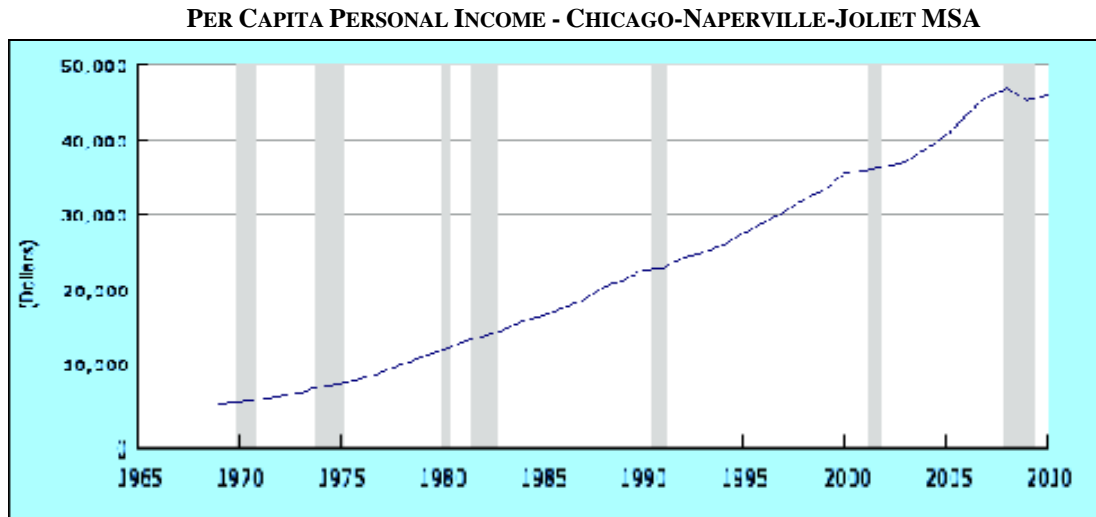
The national and Assessment Area climb out of recession has been both slow and tenuous, and continuing insecurity surrounding major economic variables, including oil and gasoline costs

and resolution of Euro-zone debt issues, national political concerns and ISIS threats makes accurate prediction of both the momentum of the full economic recovery and the return to higher levels of employment uncertain.

INCOME DEMOGRAPHICS OF THE COOK COUNTY ASSESSMENT AREA

The Bureau of Labor statistics reported that as of 4th quarter of 2010, 2,379,799 workers in Cook County received an average weekly wage of \$1,157.00, including workers receiving benefits under both State and Federal unemployment compensation programs (*Bureau of Labor Statistics*). The average national weekly wage during this time period was \$971.00

Total per capita personal income, as presented in the graph below, was noted at \$45,957 for individuals residing in the Chicago-Naperville-Joliet MSA as of January 1, 2010, recovering from the \$45,090 noted as of January 1, 2009, but still less than the January 1, 2008 high of \$46,769 noted immediately prior to the start of the most recent economic recession (*Federal Reserve Bank of St. Louis – Source: US Department of Commerce Bureau of Economic Analysis*).



US Department of Commerce
(Federal Reserve Bank of St. Louis – Source: US Department of Commerce Bureau of Economic Analysis. Gray bars represent recessionary periods.)

Reflecting the continuing weakness in the Chicago-Naperville-Joliet MSA, the U.S. Department of Housing and Urban Development (“HUD”) estimates median family income for Cook County at \$76,000 for 2015. The HUD estimate differs, although not significantly, from the weighted average median family income level for the Chicago – Naperville – Joliet MSA that, for 2010, was estimated at \$72,329. Loan programs the Bank will offer within LMI census tracts of the Assessment Area will include (but will not be limited to) originating FHA Streamline and VA Interest Rate Reduction Refinance Loans which do not require income verification, but benefit LMI households and the families of veterans who have served the nation.

IV. WEST TOWN BANK & TRUST'S STRATEGIC PLAN

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

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

The CRA regulation requires a bank formulating a Strategic Plan to establish measurable goals for evaluating its performance in meeting the CRA needs of the Bank's Assessment Area, including the needs of low and moderate income area and based on borrower profile through lending, community development investments and grants and community development services. The Bank has developed a scoring system, which will be explained in greater detail later in this Plan, to rate its achievement of goals in meeting the CRA needs of the Bank's Assessment Area during the term of this Strategic Plan.

LENDING GOALS AND MEASUREMENT STANDARDS

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

1. Purchase and origination of home mortgages in low income tracts;
2. Purchase and origination of home mortgages in moderate-income tracts;
3. Purchase and origination of small business loans in low-income tracts;
4. Purchase and origination of small business loans in moderate-income tracts;
5. Purchase and origination of home mortgages to low-income borrowers;
6. Purchase and origination of home mortgages to moderate-income borrowers;
7. Purchase and origination of small business loans to businesses with gross annual revenue of \$1 million or below.

Under the Bank's scoring system, specific achievements for each CRA criteria translate into a numeric score for those criteria. The Bank may earn points in each of the above lending goals based upon its achievements in each category. In developing the scoring system for evaluating the Bank's CRA lending performance, the Bank has analyzed its own historic lending activities from 2011 through 2015. In addition, the Bank has analyzed the lending activities of 12 other banks in its Cook County Assessment Area which are similarly situated to the Bank in size (assets), number of in market branches and number of employees. The Bank has reviewed such lending activities both with respect to the geographic distribution of lending activity within each Assessment Area and with respect to borrower profile. In developing its Strategic Plan, the Bank has developed lending goals for each of the seven lending categories listed above. Under the Strategic Plan and the scoring system set forth below, the Bank will successfully meet its CRA lending goals by either originating or purchasing loans meeting one or more of the seven outlined goals in its Assessment Area. The Bank will receive credit toward its CRA lending goals for loans originated by the Bank even if such loans are subsequently sold after their origination but will require a "hold period" for purchased loans to receive credit as described in more detail later in this plan. The Bank, its Board and Management are dedicated to enhancing its CRA lending and are of the opinion that the purchase or origination of loans to small businesses, LMI borrowers or loans made in LMI Census Tracts and the subsequent sale of those loans can be viewed favorably from a safety soundness basis. The maintenance of sound interest rate risk management and liquidity practices in effect increases the amount of funding available to such CRA loans and borrowers and insures on-going access to funding not only to the Bank, but to the other financial institutions who sell the loans to the Bank. Without a fluid secondary market to sell loans, particularly loans with fixed rate terms of five (5) years or more lending of this nature would cease to exist due to the risk to capital based on elevated interest rate risk and liquidity risk. In general, the opposite is true that by having a fluid secondary market, lenders can effectively manage their interest rate risk position in either a rising rate or falling rate environment as well as manage liquidity needs without tying up valuable funding in long maturity loans such as a thirty (30) year fixed rate mortgage. Being a small community bank loan repricing duration is a critical part of interest rate risk management and is paramount to preserve capital in any rate environment and with a limited balance sheet the Bank is restricted on the amount it can fund and hold with repricing terms of five (5) years or more. Quasi government agencies such as Freddie Mac and Fannie Mae

were developed specifically to take the risk of longer-term fixed rate products off of Banks’ balance sheet and develop a strong secondary market to facilitate the sale of such products.

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

In the spirit of regulatory cooperation, the Bank will commit to holding loans and investments purchased for a period of 6 months to qualify for credit for either lending or “outstanding” investment goals in the plan. In an effort to define the hold period for loans; the Bank may purchase a loan in the latter part of a plan year (i.e. October) that would not have the opportunity to season on the Bank’s balance sheet for six months but the Bank will get credit for this loan as if it had been held for six months in the year it was purchased. As way of example if the Bank purchases a qualified CRA loan in October of 2017 and sells it in April of 2018 it would receive credit towards the 2017 lending goal. If the loan is sold before April of 2018 it would not receive any credit. The hold period for an investment is defined in the investment goal section of this plan below.

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

See Exhibit “2” and “3” hereto for a Summary of Bank Peer Group Institutions for Assessment Area with regard to lending and investment activities. See Exhibit “4” hereto for a Summary of the Bank’s historical performance:

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

The following color coded table shows the range of possible points the Bank can earn and the points necessary to achieve Satisfactory and Outstanding scores: This table applies to all CRA goals set forth below (also see Exhibit “8”).

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

LENDING GOALS FOR COOK COUNTY ASSESSMENT AREA

The Bank’s lending goals for its Cook County Assessment Area are shown below but defined as a percentage of banks assets as measured by the immediately preceding year-end asset size of the bank (also see Exhibit “5”):

Cook County AA Lending Goals - Exhibit 5									
Residential Lending Goals		Percentage of Assets							
Points	1	3	6	7	8	9	10	11	
P&O of home mortgages in low-income tracts	0.113%	0.226%	0.302%	0.581%	0.902%	1.223%	1.544%	1.866%	
P&O of home mortgages in Moderate-income tracts	0.392%	0.783%	1.044%	1.183%	1.322%	1.460%	1.599%	1.737%	
P&O of home loans to low-income borrowers	0.057%	0.114%	0.151%	0.201%	0.251%	0.300%	0.350%	0.400%	
P&O of home loans to Moderate-income borrowers	0.147%	0.295%	0.393%	0.502%	0.610%	0.718%	0.827%	0.935%	
			Percentage of Assets			Percentage of AA Loans HMDA Reported			
			Peer	Peer Well	West Town	Peer	Peer Well	West Town	
			Average	Above Average	Bank & Trust	Average	Above Average	Bank & Trust	
Low-income tracts			0.52%	1.10%	0.15%	10.45%	36.37%	1.53%	
Moderate-income tracts			1.06%	1.31%	0.34%	21.81%	51.59%	3.37%	
Low-income borrowers			0.13%	0.27%	0.23%	1.99%	3.10%	2.30%	
Moderate-income borrowers			0.45%	0.64%	0.12%	8.28%	16.67%	1.20%	
Small Business Lending Goals		Percentage of Assets							
Points	1	3	6	7	8	9	10	11	
P&O Small Bus Loans Low-income tracts	0.042%	0.084%	0.112%	0.130%	0.159%	0.189%	0.218%	0.248%	
P&O Small Bus Loans Moderate-income tracts	0.251%	0.503%	0.670%	0.726%	0.894%	1.046%	1.198%	1.349%	
P&O Loans to Small Business <\$1mm Annual Revenue	0.223%	0.447%	0.514%	0.559%	0.614%	0.681%	0.748%	0.815%	
			Percentage of Assets						
			Peer	Peer Well	West Town				
			Average	Above Average	Bank & Trust				
Low-income tracts			0.12%	0.17%	0.00%				
Moderate-income tracts			0.60%	0.94%	0.00%				
Loans to Small Business <\$1mm Annual Revenue			0.46%	0.61%	0.68%				

The Bank will receive a score for its lending activity in each of the seven categories shown above in its Assessment Area. For example, in order to achieve a “Satisfactory” score for Purchase and Origination of home mortgages in low-income tracts in the Cook County Assessment Area, the Bank would have to purchase or originate at least 0.302% of its total assets in a low-income tract in order to earn 6 points, the minimum score for a “Satisfactory” score (green highlighted scores). To achieve an “Outstanding” score (blue highlighted scores) in this category, the Bank would need to purchase or originate at least 1.223% of total assets in a low-income tract. The Bank arrived at its mean Satisfactory percentage by considering the “Peer Average” for lending in each category and then analyzing in-market resources (branches and employees) as compared to peers, its own historical performance and guidance on levels that may be acceptable for a Strategic Plan. The Bank believes these goals to be very aggressive but will dedicate resources as required to meet these goals. The Bank arrived at its minimum “Outstanding” percentage by taking the “Peer Well Above Average” in each category. “Peer Well Above Average” is defined as one standard deviation above average as noted in the “Peer Analysis”. So in this example, the 1.223% needed for an “Outstanding” score is more than one standard deviation above 0.52%, which is average among our peers for this category. In the Bank’s previous CRA Strategic Plan, it could achieve a Satisfactory score under the Lending Test by originating or purchasing residential CRA eligible loans in the amount of 1.0% of its total year-end assets. In this Strategic Plan for the Bank

to score satisfactory it could represent an increase of nearly 50% in its CRA residential lending goals.

For Small Business Lending goals in its Cook County Assessment Area in order to achieve a “Satisfactory” score for Purchase and Origination of Small Business Loans in Low-income tracts, the Bank would have to purchase or originate 0.112% of total assets in a Low-income tract. To achieve an “Outstanding” score in this category, the Bank would have to purchase or originate 0.189% of total assets in Low-income tracts. Again, the Bank believes these goals to be very aggressive but will dedicate the required resources to meet its goals and the scoring system is identical to the residential lending goals with a score of “6” to “8” representing a satisfactory score and a score of “9” to “11” representing an outstanding score.

To complete the scoring process for the Bank’s lending goals you must first compute the score in each category within the Assessment Area. The average score for each of the seven categories will determine the score for the Bank’s Assessment Area.

Here is an example of scoring for the Assessment Area lending goals (also see Exhibit “5”):

Cook County										
Grading Example										
Points	1	3	6	7	8	9	10	11		
P&O of home mortgages in low-income tracts			0.330%							
P&O of home mortgages in Moderate-income tracts				1.190%						
P&O of home loans to low-income borrowers									0.475%	
P&O of home loans to Moderate-income borrowers						0.766%				
P&O Small Bus Loans Low-income tracts		0.090%								
P&O Small Bus Loans Moderate-income tracts	0.292%									
P&O Loans to Small Business <\$1mm Annual Revenue				0.566%						
Calculated Points	1	3	6	14	0	9	0	11		
									Sum	44
									Average	6.29

INVESTMENT AND GRANT GOALS AND MEASUREMENT STANDARDS

As a recapitalized institution with less than \$350 million in average assets at December 31, 2017, the Bank has limited resources that it may annually commit to investments and charitable gifts unrelated to its primary business operations. Nevertheless, the Bank understands that CRA-related investments and grants provide support for the efforts of local social service organizations and non-profit agencies active in the Assessment Area. In fact, in the current economic environment, many of these organizations and agencies depend on private investment funds and charitable gifts to execute critical programs that improve the lives of residents in the local communities served by the Bank, particularly LMI individuals, and help build stronger neighborhoods.

The Bank may make investments that support LMI housing opportunities, the safety and security of LMI neighborhoods and dwellings, and contribute to the economic development of LMI census tracts within the Assessment Area. Likewise, the Bank may make contributions or provide funding to community-based housing, advocacy and social services groups dedicated to improvement of the lives of LMI individuals residing in low- and moderate-income census tracts of the Bank’s service area. The Bank will begin acquiring CRA-qualified investments and/or

providing grant funds (or assets with verifiable third party values) within the Assessment Area and will adjust the level of investments and grants to housing-related service and charitable organizations during each of the five years of the Strategic Plan as a result of changes in asset size of the bank.

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

As with LMI lending, the Bank's investments in organizations benefiting LMI individuals or providing services in LMI census tracts may be resold and still qualify for investments and grants benefiting LMI individuals or LMI census tracts under this Strategic Plan. Thus, awards of "points" for reaching higher levels of new CRA-qualified investments and grants the Bank may make for community development purposes, will include but not be limited to those grants and investments, which relate to housing and security concerns, access to medical services, programs benefiting women and children, job training and economic improvement needs within LMI census tracts of the Assessment Area, will be awarded during each year of this Strategic Plan. Due to the longer-term goals such investments will seek to achieve, the Bank has set goals and will receive points under this Strategic Plan towards its "New" investment goals for an investment that is purchased and resides on its balance sheet for a six-month period. Likewise, the Bank can also receive points under this Strategic Plan towards its "Outstanding" investment goals for an investment that resides on its balance sheet for a six-month period but can only be counted once as an "Outstanding" investment in any given plan year. This does not make the New and Outstanding goals mutually exclusive and investments can be counted towards both the New and Outstanding goals in the same plan year as long as they reside on the Bank's balance sheet for a period of six months.

As a point of clarity the Bank may purchase an investment in the latter part of a plan year (i.e. October) that would not have the opportunity to season on the Bank's balance sheet for six months but should get credit for these investments as if they held them for six months in the year they were purchased and the subsequent year if held for an additional six months in the subsequent year. As way of example if the Bank purchases a qualified CRA investment in October of 2017 and sells it in October of 2018 it would receive credit as a New and Outstanding investment in 2017 and as an Outstanding investment in 2018. If the investment is sold before October of 2018 it would receive credit as a New and Outstanding investment in 2017 and no credit in 2018.

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

For its Assessment Area, the Bank has established its goals for new and existing CRA-qualified investments and grants based upon the Bank’s analysis of community development investments and grants made by the Bank’s peer group. The Bank’s peer group for investments and grants consists of 9 Chicago area and other Illinois banks that have undergone CRA examinations in 2016 or 2015 and are of an asset size that requires them to report CRA investments. The investment data from this peer group was obtained from the CRA Performance Evaluations of each peer bank and can be found as Exhibit “6” hereto.

The Bank’s Investment and Grant goals for its Assessment Area are shown below (also see Exhibit “6”):

Investment Goals - Exhibit 6								
Investment Goals								
Cook County								
Points	1.0	3.0	6.0	7.0	8.0	9.0	10.0	11.0
New Investments	0.335%	0.391%	0.447%	0.503%	0.559%	0.614%	0.670%	0.726%
Outstanding Investment	0.782%	0.838%	0.894%	0.950%	1.005%	1.061%	1.117%	1.173%
	Percentage of Assets							
	Peer	Peer Well	West Town					
Assessment Area Demographics 2015	Average	Above Average	Bank & Trust					
New and or Outstanding Investment	0.90%	1.46%	0.88%					

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

Historical Investment Performance	2011	2012	2013	2014	2015
CRA New Investments	-	-	3	1,722	1,885
CRA Outstanding Investment	-	-	-	1,725	1,722
New Investment as % of Total Assets	-	-	0.00%	0.94%	0.88%
Outstanding Investment as % of Total Assets	0.00%	0.00%	0.00%	0.94%	0.80%
Total Assets	131,079	140,392	150,121	183,453	214,636

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

Here is an example (also see Exhibit “6”):

Cook County									
Grading Example									
Points	1	3.00	6.00	7.00	8.00	9.00	10.00	11.00	
New Investments				0.52%					
Outstanding Investment									1.604%
Calculated Points	0.00	0.00	0.00	7.00	0.00	0.00	0.00	11.00	
							Sum		18.00
							Average		9.00

SERVICE GOALS AND MEASUREMENT STANDARDS

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

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

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

The Bank will earn points based on the number of hours its employees have devoted to qualified CRA community service activities and the number of employees will be based on the

number of employees as reported in the call report on December 31st of the year prior to the plan year. The bank wide service hour goals will start with a baseline of an assumed 1.5 hours of service required per bank employee. The Bank will apply adjustments to this goal based on in market resources (number of employees available to perform service hours in the Assessment Area without extensive travel) and historical performance. With the branch sale it is estimated that 20% of the Bank employees will work in the Cook County, Illinois Assessment Area- and 80% work outside of the Assessment Area. Cook County branches employ 16 of its 79 employees as of June 30, 2018. The historical performance for the Bank is exclusive to the Cook County Assessment Area and summarized below:

WTBT Historical Performance	2011	2012	2013	2014	2015	2016
Service Hours	0	29	39	43	40	40
Total Bank Employees	177	192	104	145	128	107
Hours Per Employee	0.00	0.15	0.38	0.30	0.31	0.37
			5-year Average		0.23	0.30
			3-year Average		0.33	0.33
			Goal per employee		0.50	0.50
			Goal Total Hours		64	54

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

Based on our historical performance of only 35% of the Bank’s employees working in the Assessment Area (or residing within a reasonable distance) the Bank has established a goal for “Satisfactory” performance at 0.5 hours per bank employee for the first year of this plan. We believe this to be a challenging but achievable goal and was developed based on using 1.5 hours per employee and adjusting it for “in market” resources (35% of total) and an enhancement to past performance by 51.5% ($0.5 - 0.33 = 0.17 / 0.33 = 51.5\%$).

In years 2-5 of this Strategic Plan the service hours per employee will increase by 0.1 hours per Bank employee. Since the Bank is now in the second year of the plan it plans on using the already approved goals for the second year of 0.60 hours per employee for a satisfactory rating or 45.60 total service hours (exclusively in Cook County) based on December 31, 2017 Bank census of 76 employees.

The Bank’s service hour goals for its Assessment Area, its historical performance and grading example are shown below (also see Exhibit “7”):

Community Service Hours - Exhibit 7								
WTBT Historical Performance	2011	2012	2013	2014	2015	2016	2017	
Service Hours	0	29	39	43	40	40	49	
Total Bank Employees	177	192	104	145	128	107	76	
Hours Per Employee	0.00	0.15	0.38	0.30	0.31	0.37	0.64	
			5-year Average		0.23	0.30	0.40	
			3-year Average		0.33	0.33	0.44	
			Goal per employee		0.50	0.50	0.60	
			Goal Total Hours		64	54	46	
Cook County Goals - Hours per employee								
Points	1	3	6	7	8	9	10	11
Plan Year 2017	0.418	0.459	0.500	0.600	0.700	0.800	0.900	1.000
Plan Year 2018	0.518	0.559	0.600	0.700	0.800	0.900	1.000	1.100
Plan Year 2019	0.618	0.659	0.700	0.800	0.900	1.000	1.100	1.200
Plan Year 2020	0.718	0.759	0.800	0.900	1.000	1.100	1.200	1.300
Plan Year 2021	0.818	0.859	0.900	1.000	1.100	1.200	1.300	1.400
Grading Example								
Points	1	3	6	7	8	9	10	11
Cook County - Plan Year 2019			0.750					
Calculated Points	0.00	0.00	6.00	0.00	0.00	0.00	0.00	0.00
						Sum		6.00

CATEGORY WEIGHTING

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

1. Lending Goal - 60%
2. Investment Goals – 20%
3. Service Goals – 20%

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

OVERALL BANK TEST

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

Here is an example (also see Exhibit “8”):

Grading Summary (EXAMPLE) - Exhibit 8			
Scale	Min	Max	
Outstanding	9	11	
Satisfactory	6	8	
Needs to Improve	3	5	
Substantial Noncompliance	0	2	
Overall Bank Test			
	Score	Weight	Adj Total
Lending Test	6.29	60%	3.77
Investment Test	9.00	20%	1.80
Service Test	6.00	20%	1.20
		Grand Total	6.77
CRA Regulatory Rating			Satisfactory

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

VI. OTHER STRATEGIC PLAN PROVISIONS

EFFECTIVE DATE AND TERM OF THE STRATEGIC PLAN

The Bank’s currently approved Strategic Plan covers the five (5) years beginning on January 1, 2017, through December 31, 2021. The Bank’s Board of Directors and management will oversee the Bank’s progress in meeting the Strategic Plan’s objectives. The Bank will request FDIC approval to modify or amend the Strategic Plan only if there is a material change in the assumptions underlying the Strategic Plan or in the objectives or operations of the Bank, and such changes would make the Strategic Plan no longer appropriate or viable. In such event, the Bank will administer the modified or amended Strategic Plan in accordance with the FDIC regulatory requirements, timeframes, and guidelines for approval of a CRA strategic plan. Any proposed changes to this Strategic Plan will follow the appropriate procedures for approval and notification.

TERM OF THE STRATEGIC PLAN

The current term of the Strategic Plan is anticipated to remain in effect and as amended expiring on December 31, 2021.

MAIN OFFICE AND BRANCH OFFICE INFORMATION

The Bank's main office is located at 7820 West 26th Street, North Riverside, Illinois, and its full service branch office is located at 4852 West 30th Street, Cicero, Illinois. The Bank has sold its branches locations located at 4051 S. Memorial Drive, Winterville, North Carolina and 216 Broad Street, Edenton, North Carolina. Banking services are provided through the Bank's main and branch office Monday through Saturday through its teller and drive-up facilities. Customers may visit either of the Bank's full service offices to meet with residential lending personnel, or may contact the Bank through phone, email or the Internet.

BANKING MARKETS

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

SATISFACTORY AND OUTSTANDING GOALS

The Bank believes the measurable goals for Lending, Investments and Grants, and Service as specified above, adequately considers the realities of the Bank's current and projected business model, operating environment, asset size, competitive abilities including legal restrictions on maximum loan amount, and limitations on the number and area of expertise of Bank personnel, and meeting the goals constituting a "Satisfactory" or "Outstanding" performance, as appropriate, set forth under this Strategic Plan shall fulfill the Bank's obligations under the CRA.

ONGOING REVIEW OF PERFORMANCE GOALS AND MEASUREMENT STANDARDS

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

ELECTION OF ALTERNATIVE PERFORMANCE EVALUATION

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

PRIOR PUBLICATION NOTICES

Exhibit 10 reflects the publication notices in our defined Assessment Area.