PUBLIC DISCLOSURE

June 1, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Heartland Bank and Trust Company
Certificate Number: 20369

401 North Hershey Road
Bloomington, Illinois 61704

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Chicago Regional Office

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory.**

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding	-	-	-
High Satisfactory	X	X	X
Low Satisfactory	-	-	-
Needs to Improve	-	-	-
Substantial Noncompliance	-	-	-
**The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.*			

The Lending Test is rated High Satisfactory.

- Lending levels reflect good responsiveness to assessment area credit needs.
- A substantial majority of loans are made in the institution's assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of borrowers reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The institution uses innovative and flexible lending practices in a safe and sound manner in order to serve assessment area credit needs.
- The institution makes a relatively high level of community development loans.

The Investment Test is rated High Satisfactory.

- The institution has an excellent level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits good responsiveness to credit and community development needs.
- The institution occasionally uses innovative or complex investments to support community development initiatives.

The Service Test is rated High Satisfactory.

- Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas.

- To the extent that changes were made, the institution's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals.
- Services (including where appropriate, business hours) do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and individuals.
- The institution provides a relatively high level of community development services.

DESCRIPTION OF INSTITUTION

Background

Heartland Bank and Trust Company (Heartland) is a $6.8 billion full-service community bank that is wholly-owned by HBT Financial, Inc., both headquartered in Bloomington, IL. The institution received a "Satisfactory" rating at the previous FDIC examination dated November 13, 2023, conducted using Interagency Large Bank Examination Procedures.

Operations

As of the evaluation date, Heartland operates 85 banking offices (82 full-service and three limited-service drive-thru facilities) throughout Central Illinois, extending north to the Chicago metropolitan area and south to the St. Louis, MO area. There are also four branches located in Iowa centered around Cedar Rapids. In addition, the bank operates two loan production offices (LPOs) in Illinois, one in Chicago and the other in Berwyn. Heartland completed one merger since the prior evaluation date when it acquired CNB Bank and Trust, N. A.. The merger occurred March 1, 2026, and included 18 offices located throughout Illinois and one office in Missouri. Since the previous evaluation, the bank closed three branches and relocated one branch and one LPO. Additional details regarding opening and closing of banking offices since the prior evaluation are detailed within the individual assessment areas.

Heartland offers a wide range of loan and deposit products for both commercial and retail customers. Lending products include commercial, agricultural, home mortgage, and consumer loans and the primary business focus remains on commercial and home mortgage lending. The institution provides a variety of deposit services including checking, savings, money market deposit accounts, and certificates of deposit. Alternative delivery channels include bank-owned automated teller machines (ATMs), online banking, online bill payment, mobile banking, remote deposit capture, Visa debit cards, person-to-person transfers, and telephone banking. Additionally, various merchant services are offered to help support commercial customers. The bank's website is www.hbtbank.com.

Ability and Capacity

According to the March 31, 2026, Consolidated Reports of Condition and Income, Heartland reported total assets of $6.8 billion, total loans of $4.7 billion and total deposits of $5.8 billion. The net loan-to-deposit ratio was 79.4 percent and net loan-to-asset ratio was 68.4 percent. Additionally, the bank's investment portfolio totaled $1.5 billion, which represents 21.9 percent of

total assets. Heartland experience growth in both assets and loans since the previous CRA evaluation, which is primarily attributed to the previously noted merger activity. Total assets increased by $1.8 billion, or 35.7 percent, and total loans increased by $1.3 billion, or 40.2 percent. Total deposits increased by $1.6 billion, or 38.5 percent as well.

Despite the loan growth during the review period, the composition of the loan portfolio as of March 31, 2026, reflects modest changes since the previous evaluation. Commercial lending remains the largest product line, comprising 45.8 percent of total loans followed by residential lending (single and multifamily) at 26.8 percent and agricultural lending at 12.7 percent. Examiners did not identify any financial or other legal impediments that hinder the bank's ability to provide credit within its assessment areas. Additional details regarding the loan portfolio are included in the following table.

Loan Portfolio Distribution as of 3/31/2026		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	425,335	9.1
Secured by Farmland	390,554	8.3
Secured by 1-4 Family Residential Properties	617,810	13.2
Secured by Multifamily (5 or more) Residential Properties	638,653	13.6
Secured by Nonfarm Nonresidential Properties	1,619,631	34.5
Total Real Estate Loans	**3,691,983**	**78.7**
Commercial and Industrial Loans	528,301	11.3
Agricultural Production and Other Loans to Farmers	205,740	4.4
Consumer Loans	26,398	0.6
Obligations of State and Political Subdivisions in the U.S.	143,715	3.1
Loans to Non-depository Financial Institutions and Other Loans	94,061	2.0
Total Loans	**4,690,198**	**100.0**
Source: Reports of Condition and Income. Due to rounding, totals may not equal 100.0.		

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. Heartland has designated 14 assessment areas throughout the states in which it operates, which includes metropolitan portions of Illinois, Iowa, and Missouri and non-metropolitan areas in Illinois.

The assessment areas are consistent with the requirements of the CRA, as they are comprised of whole geographies, do not arbitrarily exclude any low- or moderate-income geographies, and include all geographies where the bank’s main office, branches, and deposit-taking automated teller machines (ATMs) are located. The bank acquisition that occurred within this evaluation period resulted in the addition of eight counties, mostly in central Illinois, as well as the addition of St. Louis City and St. Louis County in Missouri. The acquisition included 18 offices, including one in Missouri. As a result, Heartland now has three rated areas, State of Illinois, State of Iowa, and the St. Louis, MO-IL Multi-state MSA.

The following table outlines the rated areas, respective assessment areas, including the respective counties, number of census tracts, and number of branches as of the date of this evaluation. A more

detailed discussion of each assessment area, including economic and demographic data, competition, and community contacts, can be found in the corresponding sections of this evaluation.

Description of Assessment Areas					
Rated Area	**Assessment Area**	**Assessment Area Abbreviated Name**	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
State of Illinois	Bloomington, IL MSA 14010	Bloomington MSA	McLean	47	9
	Chicago-Naperville-Evanston, IL MD 16984	Chicago MD	Cook, DuPage, Grundy, McHenry, Will	1,797	9
	Elgin, IL MD 20994	Elgin MD	DeKalb, Kane, Kendall	148	11
	Lake County-Kenosha County, IL-WI (part) MD 29404	Lake MD	Lake	160	1
	Ottawa, IL MSA* 36837	Ottawa MSA	Bureau, LaSalle, Putnam	40	6
	Peoria, IL MSA 37900	Peoria MSA	Marshall, Peoria, Tazewell, Woodford	93	14
	Champaign-Urbana MSA 16580	Champaign MSA	Champaign, Ford, Piatt	57	4
	Illinois Nonmetropolitan	IL Non-MSA	Adams, Christian, DeWitt, Greene, Livingston, Logan, Montgomery, Morgan, Pike, Scott	82	14
	Decatur, IL MSA 19500	Decatur MSA	Macon	37	1
	Springfield, IL MSA 44100	Springfield MSA	Sangamon	54	3
State of Iowa	Cedar Rapids, IA MSA 16300	Cedar Rapids MSA	Linn, Jones	61	2
	Iowa City, IA MSA 26980	Iowa City MSA	Johnson	36	1
	Waterloo-Cedar Falls, IA MSA 47940	Waterloo MSA	Black Hawk	39	1
St. Louis, MO-IL Multistate MSA	St. Louis, MO-IL MSA 41180	St. Louis MSA	IL: Calhoun, Jersey, Macoupin, Madison, St. Clair MO: St. Louis County, St. Louis City	492	9 (8 IL/1 MO)
*Sources: Bank Data; * - represents Micropolitan Statistical Area, CT = Census Tract*					

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated November 13, 2023, to the current evaluation dated June 1, 2026. Examiners used the Large Institution CRA Examination Procedures to evaluate Heartland's performance. These procedures include the Lending Test, Investment Test, and Service Test as outlined in the Large Bank Performance Criteria Appendix. The bank's overall rating is determined by using a points system as defined in the CRA regulation. Banks must achieve at least a Low Satisfactory rating under the Lending Test to obtain an overall Satisfactory rating. This evaluation does not include any activity performed by affiliates. Examiners relied upon records provided by the bank, 2020 Census data, D&B data, community contact information, and loan information reported under the CRA and Home Mortgage Disclosure Act (HMDA).

Heartland is considered an interstate bank because it operates banking offices in the State of Illinois, the State of Iowa, and now the State of Missouri. It is subject to the Interstate Banking and Branching Efficiency Act of 1994 (IBBEA). Examination procedures performed during the current evaluation reflected that Heartland is in compliance with all applicable requirements of IBBEA. The review will only include performance in the states of Illinois and Iowa due to how recently the Missouri office was acquired.

As previously stated, Heartland designated 14 assessment areas in Illinois, Iowa, and Missouri and lending, investment, and service test ratings are assigned for each state. Performance in the Illinois area will carry substantially more weight when drawing conclusions as this is the area where a vast majority of the bank's activities occur. Activity in the Iowa area remains limited and carries nominal weight in the overall ratings. Additionally, performance in the St. Louis MSA, which is a multi-state area comprised of portions of Illinois and Missouri will carry little weight. Although the bank previously had two offices in the Illinois portion of this multistate area, the Missouri office was only recently added in March 2026 as part of the CNB acquisition. There were an additional six branches added in the Illinois portion of the St. Louis MSA as part of the merger so performance in this area will be primarily based on the bank's activity in the two offices that were open during the entire review period.

During the previous evaluation, examiners did not review lending activity in the Decatur MSA, Springfield MSA, or St. Louis MSA assessment areas. These areas had been added due to the February 2023 acquisition of Town and Country Bank and there had not been sufficient time or activity to draw meaningful conclusions about Heartland's performance. Activity in some portions of the bank's current assessment area are being reviewed similarly during this evaluation due to the lack of activity that has occurred since the recent acquisition that occurred in March 2026. There were no new assessment areas added as part of the most recent acquisition, but some areas were expanded to include the new branch offices. The impacted assessment areas include the IL Non-MSA, and the St. Louis MSA where the timing of these changes are taken into consideration.

Community development activities in the recently expanded areas are included in the community development lending, investments, and services overall performance tables from the acquisition date through year-to-date (YTD) 2026. For the sake of consistency, the retail lending tables are based on the current assessment area delineations; however, the analysis and conclusions drawn are primarily based on the delineation that was in place when the lending activities were conducted.

Areas selected for full-scope reviews in the Illinois rated area include the Bloomington MSA, Champaign MSA, Chicago MD, Elgin MD, Lake MD, Ottawa MSA, and the non-MSA areas in downstate Illinois (not part of the Chicago CSA). The Chicago MD, Elgin MD, Lake MD, and Ottawa MSA are designated as part of the Chicago Combined Statistical Area (CSA). Performance was reviewed for each of these areas and did not reflect any material anomalies; therefore, the combined area is presented collectively and referred to as the Chicago CSA within this evaluation. The Non-MSA areas in downstate Illinois are also presented as one area. When performance is consistent across the Non-MSA portions of a single state, performance for all Non-MSA assessment areas are presented together, which is applicable for this evaluation. Limited scope procedures are utilized for reviews in the Decatur MSA, Peoria MSA, and Springfield MSA. In Iowa, the Cedar Rapids MSA and the Iowa City MSA are selected for full scope reviews. These areas are both

designated as part of the Cedar Rapids CSA. Performance was consistent among the two areas so the combined area will be presented collectively and referred to as the Cedar Rapids CSA within this evaluation. Limited scope procedures are utilized for the Waterloo MSA. The St. Louis MSA received a full scope review.

The areas selected for full scope reviews are either the areas where the bank conducts more business, there have been significant changes to the bank's presence in the area, or the areas have not been recently reviewed using full scope procedures. Areas selected for limited scope reviews represent those with nominal activity and presence.

State and Assessment Area Weighting			
Assessment Area	**Loans by $ 2023-2025**	**Deposits as of 12/31/2025**	**Branches as of 3/31/2026**
Illinois Subtotal	**91.6**	**95.0**	**84.7**
Bloomington MSA	14.6	19.8	10.6
Champaign MSA	5.2	5.4	4.7
Chicago CSA	43.9	37.6	31.8
Decatur MSA	3.0	1.0	1.2
IL Non-MSA	8.6	11.4	16.5
Peoria MSA	8.5	14.4	16.5
Springfield MSA	7.9	5.5	3.5
Iowa Subtotal	**4.2**	**2.5**	**4.7**
Cedar Rapids CSA	3.7	1.9	3.5
Waterloo MSA	0.5	0.7	1.2
St. Louis MSA Subtotal	**4.2**	**2.4**	**10.6**
St. Louis MSA	4.2	2.4	10.6
Source: Bank Data			

Activities Reviewed

Examiners determined that the bank's major product lines are commercial, home mortgage, and agricultural loans. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. Bank records indicated that the lending focus and product mix remained consistent throughout the evaluation period. Examiners did not analyze any other loan types, such as consumer loans, because they do not represent major product lines and would not provide material support for conclusions or ratings.

This evaluation considered all home mortgage loans reported on the bank's 2023, 2024, and 2025 HMDA Loan Application Registers (LARs). In 2023, the bank reported 894 loans totaling $220.6 million; in 2024, the bank reported 660 loans totaling $129.8 million; and in 2025, the bank reported 922 loans totaling $159.9 million. The decline in HMDA loan volume in 2024 is largely attributed to the bank discontinuing its third-party lending origination program where the bank helped facilitate the offering and origination of home mortgage loans for lenders that did not have the capacity to do so directly. Additionally, increased interest rates impacted demand for loans during the evaluation period. The increase in lending volume from 2024 to 2025 is attributed to the bank reporting home equity lines of credit (HELOCs). The bank's home mortgage lending performance is measured against applicable aggregate lending data, as well as demographic data housing data obtained from the 2020 US Census. Examiners placed more weight on comparisons to

aggregate data as it provides a more accurate assessment of lending opportunities within the assessment areas.

Small business loan data for 2023, 2024, and 2025 collected pursuant to CRA data collection requirements was used to evaluate the bank's record of lending to businesses during the evaluation period. In 2023, the bank reported 1,247 loans totaling $249.8 million; in 2024, the bank reported 979 loans totaling $205.9 million; and in 2025, the bank reported 906 loans totaling $198.6 million.

Similarly, small farm loan data collected and reported by the bank for 2023, 2024, and 2025 was considered in this evaluation. Specifically, in 2023, the bank reported 507 loans totaling $83.4 million; in 2024, the bank reported 571 loans totaling $91.6 million; and in 2025, the bank reported 558 loans totaling $88.1 million. The bank's lending performance for both loan products is measured against D&B data and aggregate small business and small farm loan data, respectively. This information provides insights into lending opportunities within the assessment areas.

Although there were some fluctuations in overall loan volume from year to year, which is attributed to factors such as changes in reporting requirements and the interest rate environment, there were no anomalies identified for any product lines during the review period. As a result, the most recent year of lending performance with aggregate lending data is presented for small business and small farm lending, which is 2024. Examiners also included reported lending activity that has occurred since that time. The two most recent years of aggregate lending data (2024 and 2025) was available for home mortgage loans. Management stated that this activity is representative of activity throughout the review period. While examiners presented the number and dollar volume of loans, the performance by number of loans is emphasized because it is a better indicator of the number of individuals, businesses, and farms served. Performance by dollar volume led to similar conclusions.

Considering the number and dollar volume of loans, more weight was given to small business and home mortgage lending when drawing conclusions under the Lending Test. Based on the volume of loan originations over the review period, small business lending represented the largest portion at 41.5 percent, followed by home mortgage lending at 34.5 percent, and small farm lending at 24.0 percent. The largest portion of the bank's small business lending occurred in the Chicago CSA followed by the Bloomington MSA, Peoria MSA, then the other assessment areas comprised lower volumes. Home mortgage lending volume was similar with the largest share occurring in the Chicago CSA, followed by the Springfield MSA. Home mortgage lending volume was similar in the Bloomington MSA and IL Non-MSA, followed by the Peoria and Decatur MSAs, but limited in the other assessment areas. Small farm lending was the most prominent in the Chicago CSA followed by the Bloomington MSA, IL Non-MSA, and Peoria MSA but it was very limited in the other assessment areas. These lending volumes were taken into consideration when analyzing the bank's performance and weighting by product line.

Heartland also offers an affordable small dollar loan program called Money Matters. This program has two components related to building and repairing credit and serves as an alternative to high-cost credit alternatives. Under the program, loan amounts range from $500 to $1,500 with terms of 12- or 24-months and annual percentage rates (APRs) below 36 percent. Additionally, there is streamlined underwriting and a mandatory financial education class that must be completed by each applicant. For the current evaluation period, Heartland originated 316 affordable small dollar loans

totaling $260,000 with a significant majority originated to low- and moderate-income borrowers. These loans received positive consideration due to the qualitative impact on low- and moderate-income borrowers and strengthened the bank's performance under the Innovative and Flexible Lending criteria of the Lending Test and as a retail banking service under the Service Test. Additionally, the bank offers two internally-developed mortgage lending programs, Home matters, and i-Matters (introduced in 2023). The programs use flexible underwriting standards and are designed to help potential low- and moderate-income homebuyers that might not otherwise qualify for traditional financing.

Community development loans, investments, and services conducted since the previous CRA evaluation were also reviewed. These activities were initiated or maintained in the designated assessment areas, or benefited a broader statewide or regional area, which includes the assessment areas. Heartland's community development lending, investment activities, and services were assessed on the bank's capacity, identified needs, available opportunities, and relative to various similarly situated banks using several quantitative performance measures. The Service Test also included a review of delivery systems for providing retail banking services, the impact of any branch openings/closings during the evaluation period, and retail banking products and services targeted towards low- and moderate-income individuals or small businesses or small farms within the assessment areas.

As part of the evaluation process, examiners contact third parties active in the assessment areas to assist in identifying the credit and community development needs and opportunities and determine whether local financial institutions are responsive to those needs. Sixteen previously conducted contacts were reviewed. The prior community contacts were performed within the last 24 months of the current evaluation date. Comments from the community contacts are included in the appropriate sections of this evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

A High Satisfactory rating is assigned under the Lending Test. The Lending Test rating was determined by evaluating the bank's lending activity, assessment area concentration, geographic distribution, borrower profile, community development lending, and innovative and flexible lending practices. Of these factors, more weight was placed on the geographic distribution, borrower profile, and community development lending criteria. These criteria measure the bank's effectiveness at meeting the credit needs in low- and moderate-income neighborhoods, individuals, small businesses, and small farms.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs. This conclusion is primarily supported by Heartland's performance in the Chicago CSA and Bloomington MSA and performance in the other assessment areas provide additional support. Heartland has continued to support community development activities in each area. The bank has also continued to utilize flexible lending programs that are designed to benefit low- and moderate-income individuals and

geographies. A complete discussion of the bank's performance under this criterion is located in the corresponding assessment area sections of this evaluation.

Assessment Area Concentration

A substantial majority of loans were made in the institution's assessment areas, among all three loan types, both by number and dollar volume. As reflected in the following table, most of the small business, home mortgage, and small farm loans were made within the assessment area each year. The volume of loans for all three products, by number, is generally comparable to the previous review period; however, small business and home mortgage lending both declined. Small business lending levels were higher during the previous review period from the bank's participation in the Small Business Administration (SBA) Paycheck Protection Program (PPP) that was designed to assist businesses impacted by the COVID-19 pandemic. Small business lending volume returned to more traditional levels following the expiration of the PPP program. Heartland previously participated in a third-party origination program for home mortgage loans that was discontinued at the end of 2024. Additionally, the bank started reporting HELOCs in 2025. Both of these actions impacted overall home mortgage lending volumes during the review period.

Lending Inside and Outside of the Assessment Area										
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000)**				**Total $(000)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$**	**%**	**$**	**%**	
Small Business										
2023	983	78.8	264	21.2	1,247	190,279	76.2	59,522	23.8	249,801
2024	863	88.2	116	11.8	979	177,228	86.1	28,675	13.9	205,903
2025	832	91.8	74	8.2	906	177,694	89.5	20,948	10.5	198,642
Subtotal	**2,678**	**85.5**	**454**	**14.5**	**3,132**	**545,201**	**83.3**	**109,145**	**16.7**	**654,346**
Home Mortgage										
2023	805	90.0	89	10.0	894	185,231	84.0	35,409	16.0	220,640
2024	563	85.3	97	14.7	660	111,118	85.6	18,680	14.4	129,798
2025	860	93.3	62	6.7	922	147,606	92.3	12,294	7.7	159,900
Subtotal	**2,228**	**90.0**	**248**	**10.0**	**2,476**	**443,955**	**87.0**	**66,383**	**13.0**	**510,338**
Small Farm										
2023	476	93.9	31	6.1	507	78,211	93.8	5,192	6.2	83,403
2024	538	94.2	33	5.8	571	86,247	94.2	5,303	5.8	91,550
2025	534	95.7	24	4.3	558	84,073	95.4	4,015	4.6	88,088
Subtotal	**1,548**	**94.6**	**88**	**5.4**	**1,636**	**248,531**	**94.5**	**14,510**	**5.5**	**263,041**
Total	**6,454**	**89.1**	**790**	**10.9**	**7,244**	**1,237,687**	**86.7**	**190,038**	**13.3**	**1,427,725**
Source: Imported Bank Data. Due to rounding, totals may not equal 100.0%.										

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the overall assessment area. This conclusion is primarily derived by the bank's geographic distribution of loans among all three product lines, although weaker performance was identified for small business lending in some assessment areas. A complete discussion of the bank's performance for this criterion is located in the separate assessment area sections of this evaluation.

Borrower Profile

The distribution of loans to borrowers reflects, given the product lines offered by the institution, good penetration among individuals of different income levels and business and farm operations of different sizes. This conclusion is supported by good borrower penetrations in the Chicago CSA, Illinois Non-MSA, and Cedar Rapids MSA assessment areas. Adequate performance in the other assessment areas provided additional support. Please refer to the separate assessment area sections of this evaluation for further discussion of the bank's performance under this criterion.

Innovative or Flexible Lending Practices

Heartland uses innovative or flexible lending practices to serve assessment area credit needs. The bank's innovative or flexible loan product offerings include government-sponsored loan programs that help to meet the credit needs of low- and moderate-income home mortgage borrowers, small businesses, and small farms. Downpayment assistance and grant programs are utilized as well. There is a notable increase in activity since the previous evaluation due to the bank's utilization of two agriculture-related programs offered by the State of Illinois, which started in 2024. Outside of those programs, performance was comparable to prior activity levels. The following table provides a summary of innovative or flexible lending activity conducted by the bank during this review period.

Innovative or Flexible Lending Programs - Overall										
Program	**11/14/23-12/31/23**		**2024**		**2025**		**YTD 2026**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Home Possible	4	458	17	1,816	8	777	1	83	**30**	**3,134**
Home Ready	3	483	45	4,342	34	3,579	10	894	**92**	**9,298**
FHA	1	39	20	2,815	24	3,146	7	1,067	**52**	**7,067**
USDA	1	80	11	1,238	4	522	-	-	**16**	**1,840**
VA	1	158	4	902	6	1,654	-	-	**11**	**2,714**
Home Matters	3	465	27	4,357	22	3,691	4	545	**56**	**9,058**
Small Dollar Loans	18	14	132	105	145	125	21	16	**316**	**260**
SBA	1	81	18	7,715	16	7,334	3	843	**38**	**15,973**
IL Ag Invest	-	-	188	61,898	180	59,803	193	59,016	**561**	**180,717**
Advantage Illinois	1	98	1	498	5	4,528	-	-	**7**	**5,124**
The Resurrection Project (Community 2nd)	-	-	14	513	12	459	-	-	**26**	**972**
Total	**33**	**1,876**	**477**	**86,199**	**456**	**85,618**	**239**	**62,464**	**1,205**	**236,157**
Source: Bank Data										

Various home loan programs are offered that provide flexibility to assist low- and moderate-income borrowers attain or retain homeownership. The programs include options for low down payments, reduced private mortgage insurance coverage levels, closing cost funding options, and flexible underwriting standards. Heartland utilizes its previously mentioned internal programs, Home Matters/i-Matters. These portfolio loan programs require a low-down payment and no private mortgage insurance (PMI). The fixed rate mortgage programs use flexible underwriting standards with 15-year or 30-year loan terms. Non-traditional credit sources are considered. The programs were designed to meet the mortgage needs of those who may not qualify for conventional mortgage loan products. Eligibility is determined by using either household income per U.S. Department of

Housing and Urban Development (HUD) guidelines or property is located in an eligible area. The bank also utilizes loan programs that include government guaranties through the Federal Housing Administration (FHA), United States Department of Veterans Affairs (VA), and United States Department of Agriculture (USDA). These programs have income requirements and USDA loans also have geographic limitations focused on assisting borrowers to obtain homes in rural areas. The bank also offers various loan programs through secondary market investors, Freddie Mac, and Fannie Mae. The programs are designed to assist low- and moderate-income borrowers and include:

- **Freddie Mac Home Possible** – This home mortgage program offers various flexibilities to assist low- and moderate-income borrowers attain homeownership. The program includes options for low down payments, reduced mortgage insurance coverage levels, closing cost funding options, and flexible underwriting standards.

- **Fannie Mae Home Ready Loan Program –** This loan program was designed to assist creditworthy low-income borrowers attain homeownership. The program has flexible guidelines and requires homeownership counseling.

Heartland participates in a number of other grant and downpayment programs that may be used in conjunction with the aforementioned programs. These programs have various income guidelines and flexibilities that particularly may benefit low- and moderate-income borrowers.

- **The Resurrection Project (TRP) -** The Bank has leveraged its community partner relationship with TRP to provide Community Second mortgages to borrowers needing additional funds to achieve a 20% down payment. TRP provides up to 17 percent of the down payment as a fixed rate 30-year second mortgage, matching the bank's first mortgage interest rate.

The bank participates in various loan programs that utilize government guaranties to assist commercial and agricultural borrowers, including:

- **Small Business Administration (SBA) Loans** – The SBA offers small business loan guarantees that can help cover startup costs, working capital needs, expansions, and real estate purchases as examples. These loans generally provide lower terms and longer amortization periods for small businesses than they may be able to obtain with conventional financing.

- **State of Illinois Ag Invest Annual Agriculture Loan** – This loan program makes loans more affordable for farmers and agricultural professionals. The loans can be used to help pay for major expenses like machinery; for the purchase of land up to $400,000; or for building construction, milling, processing, transportation cost, fees, salaries, irrigation systems, and other qualified expenses.

- **Advantage Illinois:** Provided through the Illinois Department of Commerce and Economic Opportunity (DCEO), the program aims to stimulate economic growth and job creation by reducing the risks associated with lending to small businesses. It also focuses on providing additional resources and funding options for businesses that demonstrate diminished access to credit.

Some of the programs can be utilized in conjunction with one another, but each activity is noted individually in the table above. The table also contains information about loan amounts rather than dollar amounts for grants awarded, when applicable.

Community Development Loans

The institution made a relatively high level of community development loans. During the evaluation period, Heartland originated 500 qualifying community development loans totaling $761.2 million within the bank's assessment areas. These figures include 24 community development loans totaling $63.8 million outside of the assessment areas that benefited the greater statewide or regional area. As the bank met the community development needs within the assessment areas, these loans were also considered.

The bank's level of community development lending represents a notable increase in the total dollar volume of loans since the previous evaluation when the bank reported 213 loans totaling $394.8 million. During this review period, total community development lending represented 21.5 percent of average total loans, 14.6 percent of average total assets. At the previous evaluation, the bank's community development lending comprised 11.6 percent of average total loans and 7.9 percent of average total assets.

Performance was compared to five similarly situated institutions operating in the area that were also evaluated during the review period. The ratio of community development lending as a percentage of average total loans for these institutions ranged from 5.4 percent to 18.3 percent and as a percentage of average total assets ranged from 2.5 percent to 11.5 percent. Heartland's performance is consistent with other institutions with a relatively high level of qualified community development lending. Heartland originated community development loans in all of its assessment areas, generally commensurate with the overall activity in each area. As detailed in the following table, the community development loans met the needs of the bank's assessment areas and included loans for affordable housing, community service, economic development, and to revitalize and stabilize low- and moderate-income areas.

Community Development Lending by Assessment Area										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Bloomington MSA	1	556	1	1,366	31	92,263	3	45,000	**36**	**139,185**
Champaign MSA	1	343	-	-	11	16,036	-	-	**12**	**16,379**
Chicago CSA	217	96,059	1	4,050	115	217,496	2	1,480	**335**	**319,085**
Decatur MSA	-	-	-	-	4	10,141	-	-	**4**	**10,141**
Illinois Non-MSA	1	98	-	-	26	46,215	1	2,000	**28**	**48,313**
Peoria MSA	3	78	-	-	15	51,855	-	-	**18**	**51,933**
Springfield MSA	5	2,777	-	-	10	19,624	3	33,760	**18**	**56,161**
St. Louis, MO-IL MSA	5	15,113	-	-	10	22,716	-	-	**15**	**37,829**
Cedar Rapids CSA	1	462	-	-	6	7,685	-	-	**7**	**8,147**
Waterloo MSA	1	2,891	-	-	2	7,335	-	-	**3**	**10,226**
Broader Statewide or Regional Area	3	21,264	-	-	20	41,601	1	938	**24**	**63,803**
Total	**238**	**139,641**	**2**	**5,416**	**250**	**532,967**	**10**	**83,178**	**500**	**761,202**
Source: Bank Data										

The following table details community development lending by year and purpose. Refer to the separate assessment area sections of this evaluation for more specific information.

Community Development Lending – Overall Assessment Area										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
11/14/23 - 12/31/23	13	1,538	-	-	8	12,732	-	-	**21**	**14,270**
2024	97	58,473	-	-	77	175,171	4	48,760	**178**	**282,404**
2025	101	51,767	1	4,050	116	283,541	2	30,000	**220**	**369,358**
YTD 2026	27	27,863	1	1,366	49	61,523	4	4,418	**81**	**95,170**
Total	**238**	**139,641**	**2**	**5,416**	**250**	**532,967**	**10**	**83,178**	**500**	**761,202**
Source: Bank Data										

A notable example of the community development lending activity in the broader statewide or regional area includes:

- Heartland extended a $19.3 million loan for the acquisition of a 246-unit townhome and apartment community in Omaha, Nebraska. All 246 units have rents below HUD Fair Market Rents (FMRs) for the county. The complexes are located adjacent to a moderate-income census tract, and this loan promotes affordable housing opportunities for low- and moderate-income individuals in the area.

INVESTMENT TEST

The Investment Test rating is High Satisfactory. This conclusion was determined by evaluating the bank's investment and grant activity, responsiveness to credit and community development needs, and use of innovative and complex investments to support community development initiatives.

Investment and Grant Activity

The institution has an excellent level of qualified community development investments and grants, particularly those that are not routinely provided by private investors and are occasionally in a leadership position. Overall, the bank's total investments and donations during the evaluation period was $301.5 million, which is 10.7 percent higher than the prior evaluation. During this period, the bank made or held 296 investments totaling $300.7 million and made 511 donations totaling approximately $794,000. The bank addressed needs within its assessment areas, so examiners also considered various investments made that benefit statewide and regional areas, which included 90 qualified investments totaling nearly $87.1 million outside of the assessment areas. It is noted that more activities were conducted within the assessment areas during this review period than in the prior period. During the current review period, 28.9 percent of investments were conducted in the broader statewide or regional area, which is lower than the 48.3 percent of investments conducted outside the bank's assessment areas during the prior review period.

Total qualified investments represented 24.1 percent of average total securities and 5.8 percent of average total assets throughout the current evaluation period, which is comparable to the previous

review period when those ratios were 22.5 percent and 5.4 percent, respectively. Examiners compared current performance against five similarly situated institutions with qualified investments compared to average total securities ratios ranging from 1.0 – 10.5 percent and qualified investments compared to average total assets ratios ranging from 0.6 – 3.1 percent. Heartland's ratios were the highest of all the banks reviewed. Heartland's investments and donations supported all four community development categories, with the largest dollar volume of investments in affordable housing initiatives. Most of the activity is comprised of prior period bonds that remain outstanding, but there were investments and donations made during the review period that support ongoing needs in the assessment areas. The following tables summarizes the bank's community development investment activity by assessment area since the prior evaluation. Refer to the separate assessment area sections of this evaluation for more information.

Qualified Investments by Assessment Area										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Bloomington MSA	13	21,104	1	431	3	3,440	-	-	**17**	**24,975**
Champaign MSA	3	10,813	5	2,579	6	2,875	-	-	**14**	**16,267**
Chicago CSA	37	59,051	38	37,790	13	10,175	1	740	**89**	**107,756**
Decatur MSA	2	627	1	1,100	2	786	-	-	**5**	**2,513**
Illinois Non-MSA	9	10,483	14	7,814	-	-	-	-	**23**	**18,297**
Peoria MSA	23	18,488	2	870	2	302	-	-	**27**	**19,660**
Springfield MSA	10	8,152	1	500	3	2,975	-	-	**14**	**11,627**
St. Louis MSA	5	7,683	2	655	-	-	-	-	**7**	**8,338**
Cedar Rapids CSA	4	2,045	-	-	3	788	-	-	**7**	**2,833**
Waterloo MSA	3	1,393	-	-	-	-	-	-	**3**	**1,393**
Broader Statewide or Regional Area	23	24,415	12	7,350	55	55,295	-	-	**90**	**87,060**
Subtotal	**132**	**164,254**	**76**	**59,089**	**87**	**76,636**	**1**	**740**	**296**	**300,719**
Qualified Grants & Donations	120	279	357	461	29	48	5	6	**511**	**794**
Total	**551**	**164,533**	**433**	**59,550**	**116**	**76,684**	**6**	**746**	**807**	**301,513**
Source: Bank Data										

The following table details the bank's investments by assessment area, year, and purpose.

Qualified Investments – Overall Assessment Area										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	79	121,990	40	36,375	57	42,929	-	-	**176**	**201,294**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	**-**	**-**
2024	2	1,865	-	-	12	11,883	-	-	**14**	**13,748**
2025	30	18,020	2	1,155	10	7,748	-	-	**42**	**26,923**
YTD 2026	21	22,379	34	21,559	8	14,076	1	740	**64**	**58,754**
Subtotal	**132**	**164,254**	**76**	**59,089**	**87**	**76,636**	**1**	**740**	**296**	**300,719**
Qualified Grants & Donations	120	279	357	461	29	48	5	6	**511**	**794**
Total	**551**	**164,533**	**433**	**59,550**	**116**	**76,684**	**6**	**746**	**807**	**301,513**
Source: Bank Data										

Notable activities conducted during the review period include:

- Heartland continues to provide financial support for the Banzai program. This financial literacy program is designed to provide individuals of all ages with lessons related to topics such as budgeting, managing expenses, and understanding insurance and credit. The bank has provided over $28,000 in funding to provide annual access for 11 schools during this review period. These are all schools where a majority of students qualify for free or reduced lunches.

- The bank continues to offer its Education Matters Scholarship (formerly known as the Heartland Bank Community Enhancement Award Scholarship). The program is administered through partnerships with 14 community colleges located within the bank's assessment areas. The bank has established criteria requiring that applicants much demonstrate financial need, reside within the bank's service area, and meet criteria including enrollment in eligible majors, maintaining academic standards, and demonstrating community involvement outside the classroom. Bank records show that 36 scholarships totaling $92,000 were granted during this review period.

- Heartland continues to offer the Home Matters grant, which is a bank funded grant program that provides up to $2,000 in closing cost assistance to borrowers who meet either income eligibility or property eligibility requirements. The grant is fully forgivable at the time of loan origination and may be used in conjunction with the bank's internal flexible lending programs, Home Matters, and i-Matters, which are described elsewhere. During this review period, the bank has awarded 78 grants totaling $120,000.

- The bank purchased eight bonds totaling $4.3 million from school districts in Illinois, but outside the bank's assessment area. The bonds are all for schools or districts that have over 50 percent of students that qualify for free or reduced lunches. The investment promotes community services in the broader statewide area.

- Heartland continues to hold 21 bonds totaling $24.3 million that are secured by Illinois Housing Development Authority (IHDA) revenue bonds. IHDA is the State of Illinois' housing finance agency and uses revenue bonds to increase the supply of housing for low- and moderate-income residents throughout Illinois.

Responsiveness to Credit and Community Development Needs

Heartland exhibits good responsiveness to credit and community economic development needs. Investments were purchased and maintained with community development purposes pertinent to the needs of the assessment areas. The majority of qualified investments promoted affordable housing, which is a primary need identified by community contacts. Additional investments were primarily focused on economic development and community service-related activities.

Community Development Initiatives

The bank occasionally uses innovative or complex investments to support community development initiatives. As previously mentioned, Heartland developed the Home Matters downpayment assistance grant program that is targeted to assist low- and moderate-income borrowers and areas. The bank also has a small dollar loan program. Most of the downpayment grants benefited borrowers in the State of Illinois, and the vast majority were in the Chicago CSA. Small dollar loans were more dispersed throughout the overall assessment area but were the most prevalent in the State of Illinois. The other investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

The Service Test rating is High Satisfactory. This conclusion was determined by evaluating the accessibility of delivery systems, changes in branch locations, reasonableness of business hours and services in meeting the assessment area needs, and community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to all portions of the institution's assessment areas. Performance under this criterion is generally consistent across all assessment areas. The bank's offices are well positioned to serve the needs of low- and moderate-income communities in most assessment areas. The bank operates nine branches in distressed middle-income tracts, which provide additional support.

The bank's alternate delivery systems promote the availability of banking services to its entire customer base, including low- and moderate-income customers and areas. Alternative delivery channels include ATMs, internet and mobile banking, electronic bill pay, mobile deposit, and telephone banking. Customers also have access to products or services, such as debit cards, direct deposit, and automatic withdrawals and transfers from deposit accounts. The bank's website provides customers with the ability to conduct various banking transactions. Business services include remote deposit capture, merchant services, and mobile banking. These methods of delivery systems are accessible from any location and help provide 24-hour access to customer accounts. The following table includes details regarding the branch and ATM distribution throughout the overall assessment area.

Branch and ATM Distribution by Geography Income Level – Overall								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	361	11.5	1,069,202	8.5	1	1.2	4	4.0
Moderate	718	22.8	2,768,647	21.9	12	14.1	14	14.1
Middle	1089	34.7	4,617,602	36.5	52	61.2	62	62.6
Upper	933	29.7	4,105,836	32.4	19	22.3	18	18.2
NA	42	1.3	95,473	0.8	1	1.2	1	1.0
Total	**3,143**	**100.0**	**12,656,760**	**100.0**	**85**	**100.0**	**99**	**100.0**
Source: 2020 Census Data and Institution Records								

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing branches has not adversely affected the accessibility of its delivery systems throughout its assessment areas. Since the prior evaluation, Heartland added 18 branches, closed three branches, relocated one branch, and relocated one LPO. All of the branches that were added were part of the 2026 acquisition of CNB Bank and Trust, which included 18 full-service branches in the Illinois Non-MSA, St. Louis MSA, and Chicago CSA assessment areas. The bank closed some locations, largely related to acquisition activity and overlapping market coverage. Overall, the new branches should help the bank effectively serve the low- and moderate-income geographies in the assessments area and the closures and relocations are not considered to have a detrimental impact. These changes are all detailed within the respective assessment areas.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies or individuals. Overall, branch hours are considered convenient and comparable to other financial institutions in the area.

Community Development Services

The institution provides a relatively high level of community development services. Over the course of the evaluation period, bank employees provided 1,071 instances of financial expertise or technical assistance to community development-related organizations throughout the combined assessment areas. This figure includes 377 instances of bank staff providing technical expertise to mortgage applicants seeking assistance with housing grant programs. The remaining 694 services involved technical assistance to organizations throughout the bank's assessment areas. Bank staff reported a total of 2,855 hours of community service, which is comparable to the 2,834 hours qualified during the previous review period. The current number of qualified services is also comparable to the previous evaluation period when the bank performed 1,159 services. These activities were responsive to identified needs throughout the assessment area.

Heartland's performance was compared to five similarly-situated banks that reported services ranging from 98 to 1,271. Heartland's performance was comparable to the bank that also had a relatively high level of activity. The following table summarizes the bank's community development service activity by year and purpose since the prior evaluation. Refer to the separate assessment area sections of this evaluation for further details.

Community Development Services – Overall Assessment Area					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
11/14/23-12/31/23	14	37	1	0	**52**
2024	194	192	9	2	**397**
2025	162	297	11	2	**472**
YTD 2026	39	102	7	2	**150**
Total	**409**	**628**	**28**	**6**	**1,071**
Source: Bank Data					

The following table summarizes the bank's community development service activity by assessment area since the prior evaluation.

Community Development Services by Assessment Area					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
Bloomington MSA	28	70	1	3	**102**
Champaign MSA	19	11	-	-	**30**
Chicago CSA	138	239	12	-	**389**
Decatur MSA	52	9	-	-	**61**
Illinois Non-MSA	39	22	11	0	**72**
Peoria MSA	32	129	3	3	**167**
Springfield MSA	63	79	-	-	**142**
St. Louis MSA	18	7	-	-	**25**
Cedar Rapids CSA	6	18	-	-	**24**
Waterloo MSA	-	43	-	-	**43**
Broader Statewide or Regional Area	14	1	1	-	**16**
Total	**409**	**628**	**28**	**6**	**1,071**
Source: Bank Data					

Some of the notable community development services include:

- In 2023, Heartland launched its "Community Matters" program that encourages employees to volunteer and participate in financial education outreach efforts. The program provides all employees with eight hours of paid time off annually to participate. Although all of the activities do not qualify as community development activities, this initiative illustrates the bank's commitment to supporting the assessment area.

- Heartland continues to offer its internally-developed financial education curriculum; Money Matters Financial Education. The course is required for the small dollar loan program and is designed to improve financial literacy. Money Matters classes are offered virtually each month, and customers may also request sessions at branches with approved instructors. During this review period, 34 employees have participated in more than 90 classes and individual sessions, providing more than 173 hours of financial education to both customers and non-customers.

- Bank staff developed and delivered financial literacy sessions at two local community colleges, Heartland Community College (Normal) and Illinois Central College (Peoria). At Heartland Community College, sessions were developed for students enrolled in TRIO Support Services and Project Rise, which are targeted to low- and moderate-income participants. At Illinois Central College, sessions were provided through the Workplace Empowerment Initiative, which is a statewide grant program focused on expanding training opportunities for individuals from distressed communities. Two bank employees delivered financial education through 17 classes providing more than 30 hours of instruction under this initiative.

- Heartland utilized several down payment assistance programs in the broader statewide or regional area including five FHLBC DPP grants totaling $50,000, three Borrow Smart grants totaling $5,500, and six IHDA grants totaling $45,000. For each grant awarded, a bank employee provides technical assistance through preparation of the grant application. This activity promotes community service through financial literacy assistance in the broader statewide or regional area.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

ILLINOIS

CRA RATING FOR ILLINOIS: Satisfactory

The Lending Test is rated: High Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS.

Heartland has designated ten assessment areas in the State of Illinois. The following table includes key details for each of the area, and further discussion is located in the separate sections of this evaluation. As previously mentioned, the IL Non-MSA was expanded due to the 2026 CNB acquisition.

Description of Assessment Areas			
Assessment Area	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
Bloomington MSA	McLean	47	9
Champaign MSA	Champaign, Ford, Piatt	57	4
Chicago MSA	Cook, DuPage, Grundy, McHenry, Will	1,797	9
Elgin MD	DeKalb, Kane, Kendall	148	11
Lake MD	Lake	160	1
Ottawa MSA*	Bureau, LaSalle, Putnam	40	6
Decatur MSA	Macon	37	1
IL Non-MSA	Adams, Christian, DeWitt, Greene, Livingston, Logan, Montgomery, Morgan, Pike, Scott	82	14
Peoria MSA	Marshall, Peoria, Tazewell, Woodford	93	14
Springfield MSA	Sangamon	54	3
*Sources: Bank Data; * - represents Micropolitan Statistical Area, CT = Census Tract*			

SCOPE OF EVALUATION – ILLINOIS

The rating for the State of Illinois is based upon full-scope reviews of the bank's performance in the Bloomington MSA, Champaign MSA, Chicago MSA, Elgin MD, Lake MD, Ottawa MSA, Illinois Non-MSA assessment areas as well as limited-scope reviews in the Decatur MSA, Peoria MSA, and Springfield MSA. For presentation purposes, the Chicago MSA, Elgin MD, Lake MD, and Ottawa MSA are collectively referred to as the Chicago CSA.

A majority of the bank's operations are in the Chicago CSA assessment area followed by the Bloomington MSA assessment area. These two areas combined account for 57.4 percent of the bank's deposits as of June 30, 2025. Reported loan activity from 2023 – 2025 indicates that 56.7 percent of loans by number and 58.0 percent by dollar volume were from these two areas. As a result, these two assessment areas carry the most weight in the overall ratings, followed by the performance in all of the other Illinois assessment areas, which carried limited weight.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ILLINOIS

LENDING TEST

The Lending Test is High Satisfactory for the Illinois rated area.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs. Performance was generally consistent among the assessment areas with good performance under borrower profile overall and adequate performance under the geographic distribution. The bank had a high level of community development lending and uses flexible lending practices to serve the assessment areas credit needs.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment areas. Performance was generally consistent in all assessment areas within the State of Illinois.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and small business and small farm customers of different sizes. Performance was consistent in the assessment areas within the State of Illinois, with the exception of the Chicago CSA and IL Non-MSA, which had stronger performance. Additionally, small farm lending was the product line with the highest penetration rates in the full scope areas.

Innovative or Flexible Lending Practices

The institution uses innovative or flexible lending practices to serve the assessment area's needs. Performance was consistent in all assessment areas within the State of Illinois.

Community Development Loans

Heartland made a relatively high level of community development loans in the Illinois assessment areas. The bank was a leader in the Bloomington MSA, made a relatively high level of loans in the Chicago CSA, and an adequate level of loans in the Champaign MSA and Illinois Non-MSA. Performance in the limited-scope areas was consistent with the other assessment areas within the State of Illinois. Heartland made 451 loans totaling $641.2 million in the Illinois assessment areas. The following table provides additional details. Refer to each assessment area for more information.

Community Development Lending – State of Illinois										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
11/14/23 - 12/31/23	13	1,538	-	-	7	11,625	-	-	**20**	**13,163**
2024	94	55,239	-	-	64	137,647	4	48,760	**162**	**241,646**
2025	96	37,412	1	4,050	102	253,075	2	30,000	**201**	**324,537**
YTD 2026	25	5,722	1	1,366	39	51,283	3	3,480	**68**	**61,851**
Total	**228**	**99,911**	**2**	**5,416**	**212**	**453,630**	**9**	**82,240**	**451**	**641,197**
Source: Bank Data										

INVESTMENT TEST

The Investment Test is High Satisfactory for the Illinois rated area.

Investment and Grant Activity

The institution has an excellent level of qualified community development investments and grants, and occasionally in a leadership position. Heartland made or held 631 qualified investments and donations totaling $201.8 million in the Illinois assessment areas. The investment and grant activity was most prominent in the Chicago CSA. The table below provides additional details. Refer to each assessment area for additional information.

Qualified Investments – State of Illinois										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Prior Period	47	89,268	36	33,374	13	13,415	-	-	**96**	**136,057**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	-	-
2024	1	865	-	-	6	1,159	-	-	**7**	**2,024**
2025	28	16,207	1	655	7	2,284	-	-	**36**	**19,146**
YTD 2026	21	22,378	25	17,055	3	3,695	1	740	**50**	**43,868**
Subtotal	**97**	**128,718**	**62**	**51,084**	**29**	**20,553**	**1**	**740**	**189**	**201,095**
Qualified Grants & Donations	109	265	303	395	25	45	5	6	**442**	**711**
Total	**206**	**128,983**	**365**	**51,479**	**54**	**20,598**	**6**	**746**	**631**	**201,806**
Source: Bank Data										

Responsiveness to Credit and Community Development Needs

The institution exhibits good responsiveness to the credit and community economic development needs. Investments and donations were made primarily to support community services for low- and moderate-income individuals.

Community Development Initiatives

The bank occasionally uses innovative or complex investments to support community development initiatives. As previously mentioned, Heartland developed the Home Matters downpayment assistance grant program that is targeted to assist low- and moderate-income borrowers and areas. The bank still also has a small dollar loan program. Most of the downpayment grants benefited borrowers in the State of Illinois, and the vast majority were in the Chicago CSA. Small dollar loans were more dispersed throughout the overall assessment area but were the most prevalent in the State of Illinois. The other investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

The Service Test is High Satisfactory for the Illinois rated area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's Illinois assessment areas. Heartland operates 72 banking locations in Illinois, including one branch and two ATMs in low-income census tracts, and nine branches and 11 ATMs in moderate-income tracts. In addition, the bank also offers other alternative delivery systems such as telephone banking, mobile banking, and online banking.

Changes in Branch Locations

To the extent that changes have been made, the opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income census tracts or to individuals. Since the prior evaluation, Heartland opened 18 branches, closed three branches and relocated one branch. In addition, the bank relocated one LPO. The branches that were added in the IL Non-MSA have improved the accessibility of the bank's delivery systems, particularly in low- and moderate-income areas.

Reasonableness of Business Hours and Services

Services, (including business hours) do not vary in a way that inconveniences portions of the Illinois assessment areas, particularly low- and moderate-income geographies and individuals. The same services and products are available at branches throughout the assessment areas despite not having dedicated lending officers at some locations. Most branches have drive-up services, ATMs, and Saturday business hours. Branch hours are convenient and comparable to other financial

institutions. There are slight differences in the business hours among locations; however, they do not vary in a way that inconveniences certain portions of the assessment areas.

Community Development Services

Heartland provides a relatively high level of community development services. This conclusion is based on available opportunities and considers the bank's presence in the assessment areas. Activity was most prominent in the Chicago CSA. Refer to each assessment area for additional information.

Community Development Services – State of Illinois					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
11/14/23 - 12/31/23	12	35	1	-	**48**
2024	177	177	9	2	**365**
2025	150	254	11	2	**417**
YTD 2026	32	93	6	2	**133**
Total	**371**	**559**	**27**	**6**	**963**
Source: Bank Data					

BLOOMINGTON MSA – Full Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BLOOMINGTON MSA ASSESSMENT AREA

Heartland designated McLean County as an assessment area. McClean County is the only county in the Bloomington MSA. The bank is headquartered in Bloomington and operates nine offices throughout the county. As of June 30, 2025, this area accounted for 19.8 percent of deposits and 14.6 percent of reported loans originated from 2023-2025. These deposit and loan levels are the second highest of all the assessment areas.

Economic and Demographic Data

This assessment area includes all 47 census tracts in McLean County. According to 2020 Census data, there are 1 low-, 13 moderate-, 22 middle-, and 8 upper-income tracts. There are three tracts that do not have an assigned income designation. There were no changes to the assessment area delineation or tract income designations during the review period. Additional demographic details about the area are included in the following table.

Demographic Information of the Assessment Area - Bloomington MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	47	2.1	27.7	46.8	17.0	6.4
Population by Geography	170,954	1.3	23.3	47.5	19.8	8.1
Housing Units by Geography	72,580	1.5	26.7	49.5	15.8	6.5
Owner-Occupied Units by Geography	43,005	0.8	23.7	51.0	22.6	1.9
Occupied Rental Units by Geography	23,220	2.4	31.1	47.1	6.2	13.3
Vacant Units by Geography	6,355	2.8	31.5	48.1	4.5	13.0
Businesses by Geography	12,521	0.9	23.5	51.7	15.7	8.3
Farms by Geography	577	0.0	15.4	68.1	13.7	2.8
Family Distribution by Income Level	39,665	21.0	16.9	22.4	39.7	0.0
Household Distribution by Income Level	66,225	27.3	14.3	16.5	42.0	0.0
Median Family Income MSA - 14010 Bloomington, IL MSA		$93,882	Median Housing Value			$ 160,478
			Median Gross Rent			$846
			Families Below Poverty Level			8.0%
Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The bank's performance under the geographic distribution criterion was compared to the respective area demographics and aggregate lending data for each product line. For home mortgage lending, the bank's performance was compared to the percentage of owner-occupied units located within geographies by income level and HMDA aggregate data. Small business and small farm lending was evaluated by comparing the bank's performance to the percentage of small businesses and small farms in the respective tract income categories, as well as corresponding CRA aggregate lending data. These characteristics provide some insight into the credit needs and demand in low- and moderate-income geographies, which are considered when evaluating geographic lending patterns. Please see the previous table for additional details.

Lending performance under the borrower profile criterion also compares the respective area demographics and aggregate lending data for each product line. The 2024 and 2025 FFIEC-updated median family income levels are used to analyze home mortgage loans under this criterion. The following table illustrates how those figures translate into low-, moderate-, middle-, and upper-income bands for the purpose of determining the bank's lending to borrowers of different income levels. The bank's performance under this criterion is compared to the percentage of families by income level and to HMDA aggregate lending levels.

Estimated Median Family Income Ranges - Bloomington MSA					
Year	**MFI**	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Bloomington, IL					
2024	$ 109,400	< $54,700	$54,700 to < $87,520	$87,520 to < $131,280	>= $131,280
2025	$ 118,800	< $59,400	$59,400 to < $95,040	$95,040 to < $142,560	>= $142,560
Source: FFIEC					

According to 2025 D&B data, the assessment area contains 12,521 non-farm businesses with the following gross annual revenues: 84.7 percent reported $1 million or less, 3.6 percent have more than $1 million, and 11.7 percent have unknown revenues. Farming operations are also prevalent in

the more rural portions of the assessment area. The assessment area contains 571 farming operations, and 98.4 percent reported revenues of $1 million or less.

Service industries represent the largest portion of businesses in the assessment area at 19.6 percent; followed by retail trade (8.4 percent); health care and social assistance (7.1 percent) and construction (7.0 percent). In addition, 67.7 percent of assessment area businesses have four or fewer employees, and 88.5 percent operate from a single location. According to Moody's, major employers include State Farm Insurance Company, Rivian, Illinois State University, and Country Financial. As detailed in the following table, unemployment rates in the assessment area were comparable to the state and national unemployment rates during the review period.

Unemployment Rates - Bloomington MSA			
Area	**2024 Average**	**2025 Average**	**April 2026**
	%	**%**	**%**
McLean County	3.9	3.9	3.7
State of Illinois	5.0	4.6	4.7
National Average	4.0	4.3	4.0
Source: Bureau of Labor Statistics			

Competition

The assessment area has a competitive market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, there were 26 financial institutions operating 45 offices within the assessment area. Heartland ranked first, maintaining a 19.8 percent deposit market share. According to 2024 HMDA aggregate lending data, Heartland ranked 17th with a market share of 1.5 percent by number of loans among 211 lenders that reported home mortgage originations or purchases in the assessment area. According to 2024 CRA aggregate data, Heartland ranked fourth in small business lending in the assessment area holding a 6.8 percent market share among the 64 reporting lenders. For small farm lending, Heartland ranked first with a 27.6 percent market share among 19 reporting lenders.

Credit and Community Development Needs and Opportunities

Considering information from bank management and demographic and economic data, examiners determined that loans for small businesses and low- and moderate-income individuals are important needs in the area. In particular, the percentage of low- and moderate-income families at 37.9 percent and 84.7 percent of businesses with GARs of $1 million or less in the assessment area support this conclusion. There are multiple Tax Increment Financing (TIF) Districts and other programs intended to support economic development in the area, which provides opportunities for small business lending.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE BLOOMINGTON MSA

LENDING TEST

Heartland demonstrated good performance under the Lending Test in the Bloomington MSA.

Lending Activity

Heartland's lending activity reflects good responsiveness to area credit needs. This conclusion is mainly supported by the significant increase in community development lending during this review period and performance under the geographic distribution and borrower profile criterion provided additional support. According to the bank's reported CRA and HMDA loan data from 2023 – 2025, this area accounted for the second highest share of lending at 14.6 percent, by dollar volume. As noted previously, in 2024 the bank ranked fourth in market share for small business loans, 17th for home mortgage loans, and led the market for small farm loans in this assessment area, all based on number of loans. Also, 18.3 percent of community development lending occurred in this assessment area, the second highest of all areas.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. Performance in small business and home mortgage lending primarily support this conclusion as the most heavily weighted product lines. Strong small farm lending performance provided additional support. For this criterion, examiners focused on the percentage of loans by number in the low- and moderate-income census tracts. The majority of the low- and moderate-income census tracts are located within the cities of Normal and Bloomington. There are also two moderate-income tracts in the eastern portion of the county that are more rural in nature and home to several farming operations. Heartland does not operate any branches in the low-income census tract in the assessment area. There are two branches in moderate-income geographies, one in Bloomington and one in Normal.

Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area, including low- and moderate-income census tracts. As detailed in the following table, less than one percent of businesses are located in the sole low-income geography and Heartland's level of lending mirrors aggregate lending levels in that area. The level of lending in moderate-income geographies was comparable to both aggregate lending levels and area demographics. Heartland was ranked fourth among all reporting lenders in moderate-income geographies in 2024.

Geographic Distribution of Small Business Loans - Bloomington MSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	0.9	0.6	1	0.6	10	0.0
2025	0.9	--	1	0.6	72	0.2
Moderate						
2024	23.6	22.2	36	21.3	8,260	27.1
2025	23.5	--	36	22.0	7,979	25.5
Middle						
2024	51.8	46.3	96	56.8	17,863	58.6
2025	51.7	--	97	59.2	18,777	60.0
Upper						
2024	15.6	25.0	30	17.8	3,844	12.6
2025	15.7	--	24	14.6	3,151	10.1
NA						
2024	8.1	5.9	6	3.6	487	1.6
2025	8.3	--	6	3.7	1,339	4.3
Total						
2024	**100.0**	**100.0**	**169**	**100.0**	**30,464**	**100.0**
2025	**100.0**	**--**	**164**	**100.0**	**31,318**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.						

Home Mortgage Lending

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Heartland did not originate any loans in the low-income geography, which is not unreasonable considering the level of opportunities as indicated by the figures in the following table.

Geographic Distribution of Home Mortgage Loans - Bloomington MSA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	0.8	1.4	0	0.0	0	0.0
2025	0.8	1.0	0	0.0	0	0.0
Moderate						
2024	23.7	22.0	18	30.0	2,564	22.4
2025	23.7	21.8	16	15.2	1,817	12.5
Middle						
2024	51.0	49.9	26	43.3	5,487	48.0
2025	51.0	50.3	58	55.2	7,762	53.4
Upper						
2024	22.6	24.3	16	26.7	3,393	29.7
2025	22.6	24.9	28	26.7	4,721	32.5
NA						
2024	1.9	2.4	0	0.0	0	0.0
2025	1.9	2.1	3	2.9	237	1.6
Total						
2024	**100.0**	**100.0**	**60**	**100.0**	**11,444**	**100.0**
2025	**100.0**	**100.0**	**105**	**100.0**	**14,537**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

As shown in the above table, lending was more prevalent in moderate-income geographies. In 2024, the bank's lending levels in moderate-income geographies exceeded aggregate by eight percent. Lending levels trailed aggregate lending levels and the area demographics in 2025, but part of the difference is attributed to the bank starting to report HELOCs that year. In 2025, there were a total of 41 HELOCs in this assessment area and most of them were made in middle- and upper-income tracts. The lending levels for non-HELOC loans in moderate-income tracts in 2025 at 20.3 percent compares more favorably to 22.5 percent aggregate and is considered adequate.

Small Farm Lending

The geographic distribution of small farm loans reflects excellent penetration throughout the assessment area and an improvement since the previous evaluation. As detailed in the following table, there are no small farms located in the low-income geography and there was no lending in that area.

More lending opportunities exist in the moderate-income geographies but are still limited. There were 577 farms in the moderate-income tracts in 2025, which is down from 733 during the previous review period. The bank's penetration rates in these geographies was comparable to aggregate lending data in 2024 but dropped in 2025. There are two moderate-income tracts located on the eastern portion of the county that are more rural in nature and home to some farming operations. There are other financial institutions located in these geographies, and in closer proximity than Heartland. Despite these challenges, Heartland was the top lender in moderate-income geographies in 2024 with almost 25.0 percent of the market share based on the number of originations.

Geographic Distribution of Small Farm Loans - Bloomington MSA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Moderate						
2024	14.2	14.1	12	12.5	1,999	13.3
2025	15.4	--	10	9.7	1,454	8.8
Middle						
2024	69.7	73.0	77	80.2	11,093	73.8
2025	68.1	--	85	82.5	13,172	80.1
Upper						
2024	14.0	11.8	5	5.2	1,650	11.0
2025	13.7	--	6	5.8	1,515	9.2
NA						
2024	2.2	1.2	2	2.1	300	2.0
2025	2.8	--	2	1.9	300	1.8
Total						
2024	**100.0**	**100.0**	**96**	**100.0**	**15,042**	**100.0**
2025	**100.0**	**--**	**103**	**100.0**	**16,441**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Borrower Profile

The distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses and farms of different sizes in the assessment area. This conclusion is primarily supported by small business and home mortgage lending, and small farm lending performance provided additional support.

Small Business Lending

The distribution of small business loans reflects adequate penetration among businesses of different sizes. As detailed in the following table, 52.7 percent of Heartland's loans in 2024 were to businesses with GARs of $1 million or less, which is in line with aggregate lending levels and performance in 2025 was similar. Heartland ranked fourth in lending to businesses of this size among the 39 reporting lenders in 2024, demonstrating the bank's ongoing commitment to meeting the needs of small businesses in this assessment area.

It is important to note that although the bank's performance lags the percentage of businesses in the assessment area that reported GARs of $1 million or less, the demographic data includes all businesses in the assessment area, and not necessarily just the businesses that have a need for financing. As such, aggregate data is considered the best comparative factor, as it reflects the actual level of lending by all reporting lenders operating in the assessment area.

Distribution of Small Business Loans by Gross Annual Revenue Category - Bloomington MSA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	83.9	52.4	89	52.7	10,038	33.0
2025	84.7	--	89	54.3	12,319	39.3
> $1,000,000						
2024	3.9	--	74	43.8	19,906	65.3
2025	3.6	--	68	41.5	17,946	57.3
Revenue Not Available						
2024	12.2	--	6	3.6	520	1.7
2025	11.7	--	7	4.3	1,053	3.4
Total						
2024	**100.0**	**100.0**	**169**	**100.0**	**30,464**	**100.0**
2025	**100.0**	**--**	**164**	**100.0**	**31,318**	**100.0**

Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Home Mortgage Lending

The distribution of home mortgage loans to borrowers of different income levels, particularly low- and moderate-incomes, reflects adequate penetration. As detailed in the following table, lending levels to low- and moderate-income borrowers were both comparable to aggregate lending data. Lending to moderate-income borrowers trailed aggregate levels in 2024 but slightly exceeded them in 2025. The bank's performance was partially attributed to the use of flexible lending programs, which can be particularly beneficial to low- and moderate-income borrowers.

Distribution of Home Mortgage Loans by Borrower Income Level - Bloomington MSA						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	21.0	11.0	8	13.3	801	7.0
2025	21.0	13.8	13	12.4	1,165	8.0
Moderate						
2024	16.9	21.7	8	13.3	1,188	10.4
2025	16.9	20.6	23	21.9	2,008	13.8
Middle						
2024	22.4	20.7	7	11.7	1,323	11.6
2025	22.4	20.9	24	22.9	3,351	23.1
Upper						
2024	39.7	24.7	25	41.7	6,036	52.7
2025	39.7	22.9	37	35.2	6,716	46.2
NA						
2024	0.0	21.8	12	20.0	2,096	18.3
2025	0.0	21.8	8	7.6	1,297	8.9
Total						
2024	**100.0**	**100.0**	**60**	**100.0**	**11,444**	**100.0**
2025	**100.0**	**100.0**	**105**	**100.0**	**14,537**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Small Farm Lending

The distribution of small farm loans to borrowers reflects excellent penetration among farms of different sizes in both 2024 and 2025. As reflected in the following table, Heartland's lending to farming operations with gross annual revenues of $1 million or less exceeds aggregate performance by 14.0 percent in 2024. This performance resulted in Heartland being the top lender in the assessment area with a 34.5 percent market share in 2024. Penetration rates with increased loan volume in 2025, demonstrating the bank's leadership and commitment to supporting smaller farming operations.

Distribution of Small Farm Loans by Gross Annual Revenue Category - Bloomington MSA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	98.4	55.8	67	69.8	8,735	58.1
2025	98.4	--	75	72.8	10,451	63.6
> $1,000,000						
2024	0.6	--	22	22.9	5,423	36.1
2025	0.5	--	19	18.5	4,910	29.9
Revenue Not Available						
2024	1.0	--	7	7.3	884	5.9
2025	1.0	--	9	8.7	1,080	6.6
Total						
2024	**100.0**	**100.0**	**96**	**100.0**	**15,042**	**100.0**
2025	**100.0**	**--**	**103**	**100.0**	**16,441**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Innovative or Flexible Lending Practices

Heartland uses flexible lending practices to serve assessment area credit needs. As reflected in the following table, the bank made or facilitated 158 flexible loans totaling $31.3 million. This is an increase from the previous evaluation when the bank made 108 flexible loans totaling $4.6 million. The majority of loans were made through the Illinois Ag Invest program followed by the small dollar loan program. All of these programs primarily benefit low- and moderate-income individuals and small businesses and farms throughout the assessment area.

Innovative or Flexible Lending Programs – Bloomington MSA										
Program	**11/14/23-12/31/23**		**2024**		**2025**		**YTD 2026**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Home Possible	-	-	1	171	1	107	-	-	**2**	**278**
Home Ready	1	176	9	1,254	5	824	1	108	**16**	**2,362**
FHA	-	-	-	-	1	128	-	-	**1**	**128**
Small Dollar Loans	6	6	21	18	29	27	1	2	**57**	**53**
SBA	-	-	1	189	2	942	1	413	**4**	**1,544**
IL Ag Invest	-	-	32	10,768	30	10,540	15	5,339	**77**	**26,647**
Advantage Illinois	-	-	-	-	1	300	-	-	**1**	**300**
Total	**7**	**182**	**64**	**12,400**	**69**	**12,868**	**18**	**5,862**	**158**	**31,312**
Source: Bank Data										

Community Development Loans

Heartland is a leader in making community development loans in this assessment area. As reflected in the following table, the bank made 36 community development loans totaling $139.2 million in this assessment area during the evaluation period. This represents 18.3 percent of the bank's total qualified lending, by dollar volume. This level of lending is a significant increase, by number and dollar volume, since the previous evaluation when the bank made 11 loans totaling $12.1 million. This activity level also reflects a continuing upward trend for community development lending in this assessment area.

Community Development Lending - Bloomington MSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
11/14/23 - 12/31/23	-	-	-	-	2	2,700	-	-	**2**	**2,700**
2024	1	556	-	-	9	29,261	1	15,000	**11**	**44,817**
2025	-	-	-	-	17	46,153	2	30,000	**19**	**76,153**
YTD 2026	-	-	1	1,366	3	14,149	--	--	**4**	**15,515**
Total	**1**	**556**	**1**	**1,366**	**31**	**92,263**	**3**	**45,000**	**36**	**139,185**
Source: Bank Data										

Notable examples of the bank's community development loans originated in the assessment area include:

- Loans totaling $2.8 million were extended for the construction of a childcare facility that was relocating to a moderate-income area. Many of the services offered are need-based and

funded by programs through the State of Illinois. This activity involves the creation and retention of permanent jobs earning low- and moderate-income wages and benefits residents in the area in that income category as well.

- Two loans totaling $4.8 million were made to a business located in a moderate-income area. The purpose of the loan was to purchase inventory and expand operations. This activity helps retain permanent jobs for low- and moderate-income individuals and supports economic development in the area.

- A total of $45.0 million in loans were extended to a local municipality to finance capital improvements and maintenance for the local water reclamation district that serves low- and moderate-income areas and residents.

INVESTMENT TEST

Heartland demonstrated good performance under the Investment Test in the Bloomington MSA. The bank's significant level of qualified investments and good responsiveness to community development needs supports this conclusion. This assessment area accounted for 8.3 percent of total qualified investments, the second highest of all.

Investment and Grant Activity

Heartland has an excellent level of qualified community investments and grants in this assessment area. As detailed in the following table, there were 73 qualified investments, grants, and donations totaling $25.1 million. This level of activity represents 8.2 percent of the bank's total community development investment activity, by dollar amount. The investment and donation activity during this review period reflects a significant increase since the previous evaluation period when the bank made or held five qualified investments, grants, and donations totaling $7.6 million.

Qualified Investments – - Bloomington MSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	2	3,567	1	431	2	3,136	-	-	**5**	**7,134**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	**-**	**-**
2024	-	-	-	-	1	304	-	-	**1**	**304**
2025	5	4,518	-	-	-	-	-	-	**5**	**4,518**
YTD 2026	6	13,019	-	-	-	-	-	-	**6**	**13,019**
Subtotal	**13**	**21,104**	**1**	**431**	**3**	**3,440**	**-**	**-**	**17**	**24,975**
Qualified Grants & Donations	4	3	49	110	-	-	3	2	**56**	**115**
Total	**17**	**21,107**	**50**	**541**	**3**	**3,440**	**3**	**2**	**73**	**25,090**
Source: Bank Data										

A majority of the bank's investments are in mortgage-backed securities that support various affordable housing needs throughout the assessment area and primarily include newly purchased investments, as well as those from the prior review period that remain outstanding.

Notable examples of qualified investments made or maintained by the bank during the current review period include:

- Most (84.5 percent) of the investments made in this area were to support affordable housing through mortgage-backed securities collateralized by loans made to low- and moderate-income borrowers or for multi-family housing complexes where a majority of units have rents below the HUD fair markets rents for the area.

- The bank invested approximately $400,000 in a bond to support improvement projects at various schools in the area where a majority of students qualify for free or reduced-price lunches.

- Heartland provided over $20,000 in financial support to a local child and family service organization that focuses on providing family support, child welfare, and early childhood care and education services. The organization's programs are largely supported through government funding and support systems that primarily benefit low- and moderate-income residents in the area.

Responsiveness to Credit and Community Development Needs

Heartland exhibits good responsiveness to credit and community economic development needs in the assessment area. Investments and grants made were consistent with the needs of the assessment area. A majority of the qualified investments and grants, by number and dollar volume, have supported affordable housing, community services, and economic development, which are needs identified during the current evaluation period.

Community Development Initiatives

The bank rarely uses innovative or complex investments to support community development initiatives. The investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

Heartland demonstrated good performance under the Service Test in the Bloomington MSA. Performance across each of the Service Test criteria supports this conclusion. The area had the fourth highest amount of qualified service activity and is home to 10.6 percent of the bank's offices.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of this assessment area. As reflected in the following table, Heartland operates nine offices and 12 ATMs in the Bloomington

MSA. The branch dispersion is relatively consistent with the population in the respective income segments. The bank does not operate any branches or ATMs in the low-income census tract; however, a very limited portion of the population resides in that tract. Two offices and three ATMs are located in moderate-income geographies. There are also branches located within very close proximity to low- and moderate-income geographies throughout the area, which helps the bank serve the banking and credit needs of those residents.

Branch and ATM Distribution by Geography Income Level - Bloomington MSA								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	1	2.1	2,268	1.3	-	-	-	-
Moderate	13	27.7	39,832	23.3	2	22.2	3	25.0
Middle	22	46.8	81,199	47.5	6	66.7	8	66.7
Upper	8	17.0	33,760	19.8	-	-	-	-
NA	3	6.4	13,895	8.1	1	11.1	1	8.3
Total	**47**	**100.0**	**170,954**	**100.0**	**9**	**100.0**	**12**	**100.0**
Sources: 2020 Census Data and Institution Records								

The bank also continues to offer a variety of alternative delivery systems that increase the availability of its loan and deposit products. Most of these delivery systems utilize technology to provide customers with 24-hour access to bank accounts and product information. The bank offers an internet and mobile banking service to pay bills and transfer funds.

Changes in Branch Locations

The bank has not opened or closed any branches in this assessment area since the prior evaluation.

Reasonableness of Business Hours and Service

Services and business hours do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income census tracts and/or individuals. Business hours are generally comparable to the market. Most branch locations are equipped with ATMs and have drive-up facilities. While there are slight differences noted among branches, none of them vary in a way that inconveniences any portions of the assessment area.

Community Development Services

Heartland provides a relatively high level of community development services. As detailed in the following table, 102 community development services were provided in this assessment area. The services in this assessment area account for 9.5 percent of the institution's total qualified activities. Of these, 20 are related to technical expertise provided to customers applying for housing grants. As affordable housing for low- and moderate-income individuals is an identified credit need in this area, this activity reflects responsiveness.

Community Development Services – Bloomington MSA					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
11/14/23-12/31/23	-	-	-	-	**4**
2024	13	18	1	1	**33**
2025	14	34	-	-	**49**
YTD 2026	1	14	-	-	**16**
Total	**28**	**70**	**1**	**3**	**102**
Source: Bank Data					

The level of qualified services performed by bank staff outside of providing expertise related to the grant program has declined since the previous evaluation period where there were 261 services provided in the assessment area. Although the number of services varies from the previous examination, the level of services and corresponding hours are very comparable. Bank staff have continued to be involved in various community organizations that focus on addressing community needs such as food insecurity and affordable housing. These services have involved serving as Board members and providing classes related to financial literacy. Some notable examples include:

- Heartland has continued to support an organization that provides services to counter domestic violence, combat homelessness, and address economic challenges for area residents. A bank employee serves as the board president and has been on the Board throughout the entire review period. Additional staff members have served on the Board as well. Bank staff also created the materials for, and helped deliver, financial education classes in conjunction with the organization.

- A bank employee serves on the Board of an organization that works to revitalize a portion of the downtown area where the low-income and most of the moderate-income tracts are located. The organization focuses on economic development and revitalizing the area.

- Heartland utilized several down payment assistance programs in the assessment area including eight FHLBC DPP grants totaling $80,000; six Borrow Smart grants totaling $14,000; three Home Matters Grants totaling $2,000; and three IHDA grants totaling $17,000. For each grant awarded, a bank employee provides technical assistance through preparation of the grant application.

CHAMPAIGN MSA – Full Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHAMPAIGN MSA ASSESSMENT AREA

Heartland designated the Champaign MSA as an assessment area. This assessment area is now comprised of Champaign, Ford, and Piatt counties in their entirety. At the previous evaluation, Ford County was in a nonmetropolitan portion of Illinois but was redesignated under OMB Circular 23-01 and became part of the Champaign MSA in January 2024. The institution operates four

offices in the area. As of June 30, 2025, this assessment area accounted for 5.4 percent of the bank's deposits and from 2023-2025, 5.2 percent of reported loans were originated in this assessment area. These deposit and loan levels are the second lowest of all the Illinois assessment areas.

Economic and Demographic Data

This assessment area includes 57 census tracts that comprise the Champaign MSA assessment area. According to 2020 Census data, these tracts reflect the following income designations: 6 low-, 11 moderate-, 17 middle-, and 18 upper-income census tracts. There are also five tracts with no income designation. There were minor changes made to income designations in Champaign County due to the OMB circular that resulted in one tract being reclassified from low- to moderate-income and another that went from moderate- to middle-income. The following table includes key demographics for the assessment area.

Demographic Information of the Assessment Area – Champaign MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	57	10.5	19.3	29.8	31.6	8.8
Population by Geography	236,072	10.5	19.0	31.9	32.3	6.3
Housing Units by Geography	107,449	11.6	21.2	33.2	29.1	4.9
Owner-Occupied Units by Geography	53,970	2.9	21.6	38.5	36.5	0.5
Occupied Rental Units by Geography	41,668	20.3	20.0	27.2	22.5	10.0
Vacant Units by Geography	11,811	20.4	23.2	30.4	18.8	7.2
Businesses by Geography	19,777	7.9	16.0	38.0	34.7	3.4
Farms by Geography	995	2.1	17.7	52.7	27.2	0.3
Family Distribution by Income Level	50,965	22.3	16.8	19.9	41.0	0.0
Household Distribution by Income Level	95,638	26.6	14.7	15.8	42.9	0.0
Median Family Income MSA - 16580 Champaign-Urbana, IL MSA		$81,070	Median Housing Value			$ 139,647
			Median Gross Rent			$873
			Families Below Poverty Level			8.3%

Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.

The bank's performance under the geographic distribution criterion was compared to the respective area demographics and aggregate lending data for each product line. These characteristics provide some insight into the credit needs and demand in low- and moderate-income geographies, which are considered when evaluating geographic lending patterns. Performance under the borrower profile criterion also compares the respective area demographics and aggregate lending data for each product line. The 2024 and 2025 FFIEC-updated median family income levels are used to analyze home mortgage loans under this criterion and are included in the following table.

Estimated Median Family Income Ranges – Champaign MSA					
Year	**MFI**	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Champaign-Urbana, IL					
2024	$ 99,000	< $49,500	$49,500 to < $79,200	$79,200 to < $118,800	>= $118,800
2025	$ 97,100	< $48,550	$48,550 to < $77,680	$77,680 to < $116,520	>= $116,520
Source: FFIEC					

According to 2025 D&B data, the assessment area contains 19,777 non-farm businesses with the following gross annual revenues: 85.7 percent reported $1 million or less, 3.0 percent have more than $1 million, and 11.3 percent have unknown revenues. Farming operations are present in the more rural portions of the assessment area. The assessment area contains 995 farming operations, and 98.3 percent reported revenues of $1 million or less.

Service industries represent the largest portion of businesses in the assessment area at 18.8 percent; followed by retail trade (7.7 percent) and healthcare and social assistance (7.3 percent). In addition, 66.7 percent of assessment area businesses have four or fewer employees, and 88.8 percent operate from a single location. According to Moody's, major employers include state and local government, Carle and Christie Clinics, Kraft Heinz Co., and Kirby Foods. Many residents of nearby small and mid-size rural areas commute to the area for employment. Unemployment rates were relatively consistent throughout the review period. As detailed in the following table, unemployment rates were similar to the state and national unemployment rates.

Unemployment Rates – Champaign MSA			
	2024	**2025**	**April 2026**
Area	**%**	**%**	**%**
Champaign County	4.2	4.1	3.9
Ford County	4.2	4.3	3.7
Piatt County	3.6	3.6	3.0
State of Illinois	5.0	4.6	4.7
National Average	4.0	4.3	4.0
Source: U.S. Bureau of Labor Statistics			

Competition

The assessment area has a competitive market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, there were 26 financial institutions operating 15 offices within the assessment area. Heartland ranked first, maintaining a 19.8 percent deposit market share. According to 2024 HMDA aggregate lending data, Heartland ranked 37th with a market share of 0.7 percent by number of loans among 257 lenders that reported home mortgage originations or purchases in the assessment area. According to 2024 CRA aggregate data, Heartland ranked 12th in small business lending with a 1.4 percent market share among the 74 reporting lenders. For small farm lending, Heartland ranked fourth with 9.1 percent market share among the 20 reporting lenders.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs and opportunities. This information helps determine whether local financial institutions are responsive to those needs. Examiners reviewed one recently conducted contact to assist in identifying credit needs and opportunities in the Champaign MSA.

The contact primarily focused on housing in Ford County, but the representative is familiar with the entire MSA. The contact explained that many younger residents are leaving the area for school and work opportunities and often not returning. They noted that the lower wages in the county make it

hard to attract new residents and that current residents commute to the nearby areas of Champaign and Bloomington for employment. The contact noted that there is limited housing in Ford County and that existing homes need renovating. They indicated that there is limited housing for low-income residents and senior citizens, particularly those in need of assistance. Some local organizations that provided assistance to those seeking housing have left the area in recent years.

Comments from the contact further indicated that there is limited development in the area. They explained that a few commercial buildings had been renovated in recent years and noted a need for access to home loans, small business loans, and farm loans, but noted rising costs as a concern for investments in the area. The contact noted that there had been some changes to the banking landscape in recent years and stated that although the banks in the area are responsive to local credit needs overall, they can further support community development in the area.

Credit and Community Development Needs and Opportunities

Considering information from community contact, bank management, and demographic and economic data, examiners determined that loans for home mortgages and small businesses are important needs in the area. A total of 39.1 percent of the families in the area are classified as low- or moderate-income and 8.3 percent are living below the poverty level. Additionally, 29.8 percent of the geographies in the area are designated as low- or moderate-income.

The need for affordable housing was identified by the contact and supported through a review of local assistance programs and projects throughout the area. The need for small business loans is also prominent in the area, which is supported by the high percentage of businesses with gross annual revenues of $1 million or less at 81.1 percent. Numerous opportunities were identified for economic development in the assessment area that involve various grant programs to spur involvement. These areas utilize tools such as Tax Increment Financing (TIF) districts, which is a public financing method that is used as a subsidy for redevelopment, infrastructure, and other community improvement projects. Enterprise Zones, which are also a tool designed to stimulate economic growth and neighborhood revitalization in economically challenged areas, are also present in the area. There are adequate opportunities for financial institutions to become involved in credit and community development activities.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CHAMPAIGN MSA ASSESSMENT AREA

LENDING TEST

Heartland demonstrated adequate performance under the Lending Test in the Champaign MSA.

Lending Activity

Heartland's lending activity reflects adequate responsiveness to area credit needs. This conclusion is mainly supported by adequate performance under the geographic distribution and borrower profile criterion and level of community development lending during this review period. According to the bank's reported CRA and HMDA loan data from 2023 – 2025, this area accounted for the

sixth lowest share of lending at 5.2 percent, by dollar volume. As noted previously, in 2024 the bank ranked 12th in market share for small business loans, 37th for home mortgage loans, and fourth for small farm loans in this assessment area, by dollar volume. Also, 2.2 percent of all community development lending occurred in this assessment area.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area considering the demographics, lending opportunities, and locations of the institution. The bank's small business and home mortgage performance primarily supports this conclusion.

The assessment area has 6 low-income tracts and 11 moderate-income tracts. All six low-income tracts in the assessment area are located in Champaign County, five of which are located in northern portions of Champaign in the vicinity of the University of Illinois campus. The remaining low-income tract in the northern part of the county is in Rantoul, which is approximately 15 miles north of Champaign. Out of the 11 moderate income tracts, eight are located in Champaign County (Champaign – seven; Rantoul – one). Most of the moderate-income tracts are still around the University of Illinois campus area, as well as the northern portion of the county in Rantoul. Outside of Champaign County, there are two moderate-income tracts in the eastern portion of Ford County. These tracts are approximately five miles east of the bank's Gibson City branch. There is also one moderate-income tract in the southeastern portion of Piatt County where the bank does not have an office.

As previously mentioned, Heartland operates four offices in this assessment area. Three offices are located in more urban portions of Champaign County, and one office is in Ford County. Two of the Champaign County offices are in moderate-income tracts; one is in Champaign and the other is in Urbana. There is an additional branch in an upper-income tract approximately three miles from the Champaign office.

Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area, including low- and moderate-income census tracts. As detailed in the following table, lending levels in both low-and moderate-income geographies trailed aggregate lending levels in 2024, by 2.5 percent and 9.3 percent, respectively. There are more businesses in moderate-income geographies, and the bank has two offices in moderate-income tracts that are in urban areas with elevated levels of businesses. Lending levels increased in both tract income categories in 2025 and were more reflective of area demographics.

Geographic Distribution of Small Business Loans – Champaign MSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	7.9	6.7	2	4.2	196	1.7
2025	7.9	--	3	6.7	953	7.6
Moderate						
2024	15.9	13.5	2	4.2	380	3.3
2025	16.0	--	8	17.8	2,552	20.4
Middle						
2024	38.4	34.3	21	43.8	4,871	42.0
2025	38.0	--	18	40.0	4,739	37.8
Upper						
2024	34.1	42.0	23	47.9	6,165	53.1
2025	34.7	--	16	35.6	4,295	34.3
NA						
2024	3.6	3.6	0	0.0	0	0.0
2025	3.4	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**48**	**100.0**	**11,612**	**100.0**
2025	**100.0**	**--**	**45**	**100.0**	**12,539**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Home Mortgage Lending

The geographic distribution of home mortgage loans reflects adequate dispersion throughout the assessment area. Heartland made one home mortgage loan in low-income tracts in both 2024 and 2025 resulting in lending levels comparable to aggregate lending levels and area demographics. As detailed in the following table, there is a minimal number /of owner-occupied housing in the low-income census tracts of this assessment area, which are part of or adjacent to the University of Illinois campus area. These areas contain highly elevated levels of rental properties for student housing, limiting lending opportunities.

Geographic Distribution of Home Mortgage Loans – Champaign MSA							
Tract Income Level		**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low	2024	2.9	3.4	1	3.6	117	2.3
	2025	2.9	3.3	1	2.7	119	1.8
Moderate	2024	21.6	22.1	6	21.4	778	15.2
	2025	21.6	20.7	5	13.5	572	8.7
Middle	2024	38.5	37.2	10	35.7	1,399	27.4
	2025	38.5	38.2	18	48.7	3,232	49.4
Upper	2024	36.5	36.3	11	39.3	2,819	55.1
	2025	36.5	36.7	13	35.1	2,618	40.0
NA							
	2024	0.5	1.0	0	0.0	0	0.0
	2025	0.5	1.1	0	0.0	0	0.0
Total							
	2024	**100.0**	**100.0**	**28**	**100.0**	**5,113**	**100.0**
	2025	**100.0**	**100.0**	**37**	**100.0**	**6,541**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.							

There are a greater number of owner-occupied housing units in the moderate-income geographies, which presents more potential lending opportunities. As mentioned, many of the moderate-income tracts are around the campus area. Only about half (51.3 percent) of the housing units in moderate-income geographies are owner-occupied, approximately one-third (36.6 percent) are rentals, and the rest are vacant. Performance in moderate-income geographies was comparable to aggregate lending levels in 2024, but trailed by 7.2 percent in 2025, which is considered poor. Despite the downward trend in 2025, lending performance is adequate overall, particularly, considering the adequate performance in 2024, housing demographics and competition in the area.

Small Farm Lending

The geographic distribution of small farm loans reflects poor penetration throughout the assessment area. The distribution of the bank's loans is generally reflective of the disbursement of farming operations throughout the area. As detailed in the following table, very few farming operations are located in the low-income geographies in this assessment area, and aggregate lending levels reflect minimal activity. As indicated in the prior two sections, the low-income tracts in this assessment area are primarily urban in nature with insufficient acreage to allow for any significant level of farming. There are more farming operations in moderate-income geographies. The bank made two loans in moderate-income tracts, both in 2025. Aggregate lending data for 2024 reflected limited lending in the low- and moderate-income tracts. The data reflected a total of two loans in low-income tracts, both made by the same lender. There were 31 loans in moderate-income geographies. The top lender held a 48.4 percent market share and the top five lenders accounted for 87.1 percent of the market. Limited demand and competition in the area contribute somewhat to the bank's poor performance under this criterion; however, it did not impact the bank's overall CRA rating as less weight was placed on lending activity in this assessment area and this product line.

Geographic Distribution of Small Farm Loans – Champaign MSA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	2.2	0.8	0	0.0	0	0.0
2025	2.1	--	0	0.0	0	0.0
Moderate						
2024	18.2	11.7	0	0.0	0	0.0
2025	17.7	--	2	10.5	378	10.2
Middle						
2024	54.4	58.5	16	66.7	3,266	83.1
2025	52.7	--	12	63.2	2,670	72.3
Upper						
2024	24.9	26.0	8	33.3	664	16.9
2025	27.2	--	5	26.3	646	17.5
NA						
2024	0.2	3.0	0	0.0	0	0.0
2025	0.3	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**24**	**100.0**	**3,930**	**100.0**
2025	**100.0**	**--**	**19**	**100.0**	**3,694**	**100.0**

Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.

Borrower Profile

The distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses and farms of different sizes in the assessment area. This conclusion is primarily supported by good performance in small farm lending and adequate small business and home mortgage lending performance.

Small Business Lending

The distribution of small business loans reflects adequate penetration among businesses of different sizes in both 2024 and 2025. As detailed in the following table, Heartland's level of lending to businesses with gross annual revenues of $1 million or less is comparable to aggregate lending levels in 2024 and remained similar in 2025.

Distribution of Small Business Loans by Gross Annual Revenue Category – Champaign MSA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	85.1	55.8	27	56.3	5,661	48.8
2025	85.7	--	24	53.3	5,397	43.0
> $1,000,000						
2024	3.2	--	19	39.6	5,611	48.3
2025	3.0	--	19	42.2	7,087	56.5
Revenue Not Available						
2024	11.7	--	2	4.2	340	2.9
2025	11.4	--	2	4.4	55	0.4
Total						
2024	**100.0**	**100.0**	**48**	**100.0**	**11,612**	**100.0**
2025	**100.0**	**--**	**45**	**100.0**	**12,539**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Home Mortgage Lending

The distribution of home mortgage loans to borrowers of different income levels, particularly low- and moderate-incomes, reflects adequate penetration. As detailed in the following table, lending to low-income borrowers is comparable to, but slightly trailed aggregate in 2024, then nearly doubled aggregate in 2025. Lending levels for moderate-income borrowers were comparable to aggregate lending levels for both years.

Distribution of Home Mortgage Loans by Borrower Income Level – Champaign MSA						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	22.3	11.3	2	7.1	182	3.6
2025	22.3	8.4	6	16.2	371	5.7
Moderate						
2024	16.8	20.8	6	21.4	591	11.6
2025	16.8	19.7	7	18.9	601	9.2
Middle						
2024	19.9	19.6	9	32.1	1,664	32.5
2025	19.9	20.2	4	10.8	608	9.3
Upper						
2024	41.0	29.9	9	32.1	2,453	48.0
2025	41.0	30.7	15	40.5	3,219	49.2
NA						
2024	0.0	18.5	2	7.1	223	4.4
2025	0.0	21.1	5	13.5	1,742	26.6
Total						
2024	**100.0**	**100.0**	**28**	**100.0**	**5,113**	**100.0**
2025	**100.0**	**100.0**	**37**	**100.0**	**6,541**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Small Farm Lending

The distribution of small farm loans to borrowers reflects good penetration, particularly for farming operations with gross annual revenues of $1 million or less. Heartland's lending levels exceeded aggregate in 2024 by 21.0 percent and reflected an increase in 2025 for farm borrowers in this income segment. Based on 2024 aggregate data, Heartland ranked third out of 14 lenders with a 14.3 percent market share.

Distribution of Small Farm Loans by Gross Annual Revenue Category – Champaign MSA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	98.4	37.0	14	58.3	2,046	52.1
2025	98.3	--	14	73.7	1,944	52.6
> $1,000,000						
2024	0.8	--	9	37.5	1,834	46.7
2025	0.7	--	5	26.3	1,750	47.4
Revenue Not Available						
2024	0.8	--	1	4.2	50	1.3
2025	1.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**24**	**100.0**	**3,930**	**100.0**
2025	**100.0**	**--**	**19**	**100.0**	**3,694**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.						

Innovative or Flexible Lending Practices

Heartland uses flexible lending practices to serve assessment area credit needs. As reflected in the following table, the bank made or facilitated 87 flexible loans totaling $8.7 million. The majority of loans were made through the Illinois Ag Invest program. All of these loan programs primarily benefit low- and moderate-income individuals and small businesses and farms throughout the assessment area.

Innovative or Flexible Lending Programs – Champaign MSA										
Program	**11/14/23-12/31/23**		**2024**		**2025**		**YTD 2026**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Home Possible	-	-	1	102	-	-	-	-	**1**	**102**
Home Ready	-	-	3	304	2	202	1	104	**6**	**610**
USDA	-	-	1	117	-	-	-	-	**1**	**117**
Home Matters	-	-	-	-	1	146	-	-	**1**	**146**
Small Dollar Loans	3	3	26	19	26	21	2	2	**57**	**45**
Advantage Illinois	-	-	-	-	2	1,973	-	-	**2**	**1,973**
Illinois Ag Invest	-	-	8	2,375	8	2,375	3	975	**19**	**5,725**
Totals	**3**	**3**	**39**	**2,917**	**39**	**4,717**	**6**	**1,081**	**87**	**8,718**
Source: Bank Data										

Community Development Loans

Heartland made an adequate level of community development loans in this assessment area. As reflected in the following table, the bank made 12 community development loans totaling $16.4 million in this assessment area during the evaluation period. This represents 2.2 percent of the bank's total qualified lending, by dollar volume. This level of lending is an increase by number, but slightly lower by dollar volume, since the previous evaluation when the bank made six loans totaling $18.5 million.

Community Development Lending – Champaign MSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
11/14/2023 - 12/31/2023	-	-	-	-	-	-	-	-	**-**	**-**
2024	-	-	-	-	4	5,421	-	-	**4**	**5,421**
2025	1	343	-	-	6	10,015	-	-	**7**	**10,358**
YTD 2026	-	-	-	-	1	600	-	-	**1**	**600**
Total	**1**	**343**	**-**	**-**	**11**	**16,036**	**-**	**-**	**12**	**16,379**
Source: Bank Data										

Notable examples of the bank's community development loans originated in the assessment area include:

- A $1.2 million loan was extended for a local business to purchase a new office building located in an Enterprise Zone. The property is located in an area with moderate-income tracts, and the business will help create and retain employment for area residents.

- A $300,000 loan was originated to acquire a multi-family apartment complex. The complex has six units that are all leased for rates that are below the fair market rent for the area, which supports affordable housing.

INVESTMENT TEST

Heartland demonstrated adequate performance under the Investment Test in the Champaign MSA. The bank's adequate level of qualified investments and responsiveness to community development needs supports this conclusion. This assessment area accounted for 5.4 percent of total qualified investments, ranking fifth among all areas.

Investment and Grant Activity

Heartland has an adequate level of qualified community investments and grants in this assessment area. As detailed in the following table, there were 31 qualified investments, grants, and donations totaling $16.3 million. This level of activity represents 5.4 percent of the bank's total community development investment activity, by dollar amount. The investment and donation activity during this review period reflects a slight decrease since the previous evaluation period when the bank made or held 38 qualified investments, grants, and donations totaling $18.2 million. A majority of the bank's investments are in mortgage-backed securities that support various affordable housing needs throughout the assessment area and primarily include investments from the prior review period that remain outstanding.

Qualified Investments – Champaign MSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	2	10,633	4	2,079	5	2,500	-	-	**11**	**15,212**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	1	375	-	-	**1**	**375**
YTD 2026	1	180	1	500	-	-	-	-	**2**	**680**
Subtotal	**3**	**10,813**	**5**	**2,579**	**6**	**2,875**	-	-	**14**	**16,267**
Qualified Grants & Donations	3	5	14	18	-	-	-	-	**17**	**23**
Total	**6**	**10,818**	**19**	**2,597**	**6**	**2,875**	-	-	**31**	**16,290**
Source: Bank Data										

Notable examples of qualified investments made or maintained by the bank during the current review period include:

- A $500,000 general obligation bond was purchased from a school where a majority of students qualify for free or reduced lunches. The bond assisted the district with ongoing financing needs.

- The bank maintained a series of general obligation bonds totaling $2.5 million for a local municipality to fund the development of a sports complex. The complex is located in a TIF District, will support local school districts, and help attract visitors and new residents to the area.

- Heartland donated $5,000 to a local organization that helps address food insecurity in the assessment area.

Responsiveness to Credit and Community Development Needs

Heartland exhibits adequate responsiveness to credit and community economic development needs in the assessment area. Investments and grants made were consistent with the needs of the assessment area. A majority of the qualified investments and grants, by number and dollar volume, have supported community services, economic development, and affordable housing, which are needs identified during the current evaluation period.

Community Development Initiatives

The bank rarely uses innovative or complex investments to support community development initiatives. The investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

The service performance reflects adequate responsiveness to the credit and community development needs in the Champaign MSA. Performance across each of the Service Test criteria supports this conclusion. The area had 2.8 percent of qualified service activity and is home to 4.7 percent of the bank's offices.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of this assessment area. As reflected in the following table, Heartland operates four offices and four ATMs in the Champaign MSA. The branch dispersion is relatively consistent with the population in the respective income segments; however, the bank's presence in moderate-income geographies surpasses those levels. The bank does not operate any branches or ATMs in the low-income census tracts; however, they do have branches in very close proximity, which helps the bank serve the banking and credit needs of those residents. The bank also continues to offer a variety of alternative delivery systems that increase the availability of its loan and deposit products. Most of these delivery systems utilize technology to provide customers with 24-hour access to bank accounts and product information. The bank offers an internet and mobile banking service to pay bills and transfer funds.

Branch and ATM Distribution by Geography Income Level – Champaign MSA								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	6	10.5	24,685	10.5	-	-	-	-
Moderate	11	19.3	44,844	19.0	2	50.0	2	50.0
Middle	17	29.8	75,246	31.9	1	25.0	1	25.0
Upper	18	31.6	76,319	32.3	1	25.0	1	25.0
NA	5	8.8	14,978	6.3	-	-	-	-
Total	**57**	**100.0**	**236,072**	**100.0**	**4**	**100.0**	**4**	**100.0**
Sources: 2020 Census Data and Institution Records								

Changes in Branch Locations

The bank has not opened or closed any branches in this assessment area since the prior evaluation.

Reasonableness of Business Hours and Service

Services and business hours do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income census tracts and/or individuals. Business hours are generally comparable to the market. Most branch locations are equipped with ATMs and have drive-up facilities. While there are slight differences noted among offices, none of them vary in a way that inconveniences any portions of the assessment area.

Community Development Services

Heartland provides an adequate level of community development services. As detailed in the following table, 30 community development services were provided in this assessment area. The services in this assessment area account for 2.8 percent of the institution's total qualified activities during this review period.

Community Development Services – Champaign MSA					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
11/14/23-12/31/23	-	-	-	-	**3**
2024	7	-	-	-	**7**
2025	7	2	-	-	**9**
YTD 2026	5	6	-	-	**11**
Total	**19**	**11**	**-**	**-**	**30**
Source: Bank Data					

The level of qualified services performed by bank staff outside of providing expertise related to the grant program has declined since the previous evaluation period. Bank management shared that staff have started providing regular financial literacy classes for two local organizations in April 2026. The organizations specialize in addressing affordable housing and community service-related needs in the area. Other notable examples include:

- An employee serves on a committee for a local housing authority that focuses on targeted programs for residents to obtain and retain housing. Heartland staff members have also

provided financial education courses in conjunction with the organization as it assists residents with coordinating supportive services and various community-centered initiatives.

- A bank employee serves on the Investment Committee providing financial expertise for a local hospital foundation. The hospital is designated as a critical access facility, and it operates in a health professional shortage area. The foundation supports healthcare provisions in the community, supports a local food pantry, and operates a scholarship program to help recruit and retain healthcare workers.

- Heartland utilized several down payment assistance programs in the assessment area including three FHLBC DPP grants totaling $30,000; five Borrow Smart grants totaling $11,000; two Home Matters Grants totaling $2,000; and one IHDA grant for $5,000. For each grant awarded, a bank employee provides technical assistance through preparation of the grant application.

CHICAGO CSA – Full Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHICAGO CSA ASSESSMENT AREA

Heartland has designated portions of the Chicago-Naperville-Elgin, IL-IN MSA as an assessment area. This MSA combines four contiguous Metropolitan Districts (MD) in northeast Illinois and northwest Indiana into one multi-state MSA. All of the bank's operations in this delineated area are in the State of Illinois and include the following:

- Chicago-Naperville-Schaumburg, IL MD (Cook, DuPage, Grundy, McHenry, and Will Counties)
- Elgin, IL MD (DeKalb, Kane, and Kendall Counties)
- Lake County, IL MD (Lake County)

In addition, Heartland has designated the Ottawa, IL Micropolitan Statistical Area that includes Bureau, LaSalle, and Putnam Counties as an assessment area. As previously explained, performance was reviewed for each of these areas and did not reflect any anomalies; therefore, the combined area (Chicago-Naperville, IL-IN-WI Combined Statistical Area) is presented collectively and referred to as the Chicago CSA. There have not been any changes to the delineation of this assessment area since the previous evaluation.

A majority of the bank's branches, lending, and deposit activity are conducted in this assessment area. Heartland operates 27 branches in this assessment area, which is 31.8 percent of all their branches open as of June 1, 2026. As of June 30, 2025, this assessment area accounted for 37.6 percent of the bank's deposits and from 2023-2025, over 43.9 percent of all reported loans, by dollar volume, were originated in this area; both the highest of all the assessment areas. Additionally, the bank conducted a majority of its community development lending, investments, and service activities within this assessment area; therefore, it received the most weight in the overall CRA rating.

Economic and Demographic Data

This assessment area includes all 2,145 census tracts that reflect the following income designations for the combined area: 247 low-income, 489 moderate-income, 696 middle-income, 687 upper-income, and 26 tracts with no income designation. There were some changes to portions of the assessment area based on 2023 Office of Management and Budget (OMB) Circular 23-01, which became effective in 2024. Additionally, some portions of the area were designated as distressed due to unemployment, as detailed further in the following table.

Census Tract Changes – Chicago CSA

County	2020 Census - Tract Income Levels	2024 Tract Income Levels	Distressed Tracts – Unemployment	Branches
Bureau County	Middle (10)		9647, 9648, 9649, 9650, 9651, 9652, 9653, 9654, 9655, 9656	4
Cook County	Low (225), Moderate (351), Middle (369), Upper (371), NA (16)			5
DeKalb County	Low (1), Moderate (5), Middle (15), NA (2)			6
DuPage County	Low (1), Moderate (14), Middle (90), Upper (114)			0
Grundy County	Moderate (1), Middle (9)			1
Kane County	Low (1), Moderate (38), Middle (30), Upper (33), NA (2)			2
Kendall County	Moderate (2), Middle (12), Upper (7)			3
Lake County	Low (9), Moderate (30), Middle (54), Upper (63), NA (4)	Low (13), Moderate (33), Middle (49), Upper (61), NA (4)		1
LaSalle County	Moderate (2), Middle (21), Upper (5)	Moderate (2), Middle (19), Upper (7)	9617.02, 9618, 9619, 9620, 9621, 9626, 9628, 9629, 9630, 9631, 9632, 9634, 9635, 9636, 9637, 9638, 9639, 9642, 9643	2
McHenry County	Moderate (11), Middle (27), Upper (26)			0
Putnam County	Middle (2)		9545, 9546	0
Will County	Low (6), Moderate (32), Middle (64), Upper (68), NA (2)			3

Sources: Bank data, FFIEC

Additional demographic information about the area is shown in the following table.

Demographic Information of the Assessment Area - Chicago CSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	2,145	11.5	22.8	32.5	32.0	1.2
Population by Geography	8,879,227	8.8	22.6	34.5	33.5	0.6
Housing Units by Geography	3,551,543	9.2	22.1	34.4	33.9	0.5
Owner-Occupied Units by Geography	2,106,186	4.4	18.5	37.6	39.3	0.2
Occupied Rental Units by Geography	1,167,205	15.5	27.8	30.1	25.7	1.0
Vacant Units by Geography	278,152	19.1	24.9	27.8	27.3	0.9
Businesses by Geography	1,092,346	5.4	17.3	32.2	44.6	0.5
Farms by Geography	7,209	2.2	8.9	44.5	44.2	0.2
Family Distribution by Income Level	2,106,596	22.9	16.7	19.3	41.0	0.0
Household Distribution by Income Level	3,273,391	25.3	15.4	17.0	42.4	0.0
Median Family Income MD - 16984 Chicago-Naperville-Schaumburg, IL MD Median Family Income MD - 20994 Elgin, IL MD Median Family Income MD - 29404 Lake County, IL MD Illinois Non-MSA Median Family Income		$92,622 $97,326 $112,326 $67,835	Median Housing Value			$ 280,267
			Median Gross Rent			$1,231
			Families Below Poverty Level			8.0%
Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The bank's performance under the geographic distribution criterion was compared to the respective area demographics and aggregate lending data for each product line. These characteristics provide some insight into the credit needs and demand in low- and moderate-income geographies, which are considered when evaluating geographic lending patterns. Performance under the borrower profile criterion also compares the respective area demographics and aggregate lending data for each product line. The 2024 and 2025 FFIEC-updated median family income levels are used to analyze home mortgage loans under this criterion and are included in the following table.

Estimated Median Family Income Ranges - Chicago CSA					
Year	**MFI**	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Chicago-Naperville-Schaumburg, IL					
2024	$ 109,800	< $54,900	$54,900 to < $87,840	$87,840 to < $131,760	>= $131,760
2025	$ 117,400	< $58,700	$58,700 to < $93,920	$93,920 to < $140,880	>= $140,880
Elgin, IL					
2024	$ 113,700	< $56,850	$56,850 to < $90,960	$90,960 to < $136,440	>= $136,440
2025	$ 119,400	< $59,700	$59,700 to < $95,520	$95,520 to < $143,280	>= $143,280
Lake County, IL					
2024	$ 129,600	< $64,800	$64,800 to < $103,680	$103,680 to < $155,520	>= $155,520
2025	$ 143,000	< $71,500	$71,500 to < $114,400	$114,400 to < $171,600	>= $171,600
Non-Metro Median Family Income For ILLINOIS					
2024	$ 82,800	< $41,400	$41,400 to < $66,240	$66,240 to < $99,360	>= $99,360
2025	$ 86,600	< $43,300	$43,300 to < $69,280	$69,280 to < $103,920	>= $103,920
Source: FFIEC					

According to 2025 D&B data, the assessment area contains 1,092,346 non-farm businesses with the following revenue characteristics: 90.3 percent have $1 million or less, 3.1 percent have more than $1 million, and 6.6 percent have unknown revenues. Farming operations are prevalent in the rural portions of the assessment area. The assessment area contains 7,209 farming operations, and 97.9 percent reported revenues of $1 or less. The following table provides additional details reflecting the businesses and farms throughout the Chicago CSA.

Businesses and Farms – Chicago CSA		
Area	**Total Non-Farm Businesses**	**Total Farms**
Chicago-Naperville-Schaumburg, IL MD (Cook, DuPage, Grundy, McHenry, and Will Counties)	935,941	4,634
Elgin, IL MD (DeKalb, Kane, and Kendall Counties)	61,559	1,117
Lake County, IL MD (Lake County)	83,058	580
Ottawa, IL MSA(Bureau, LaSalle, and Putnam Counties)	11,788	878
Source: 2025 D&B Data		

Service industries represent the largest portion of businesses in the assessment area at 19.3 percent; followed by healthcare, retail trade, construction, and transportation and warehousing, which each account for just over six percent of businesses in the area. Over 94.0 percent of businesses in the assessment area have less than ten employees. Specifically, 64.8 percent of businesses have four or fewer employees, and 29.6 percent have between five and nine employees. A majority of businesses (93.0 percent) operate from a single location. These demographics indicate the potential for banks to participate in small business and small farm lending within the assessment area.

As detailed in the following table, unemployment rates throughout the assessment area were generally consistent during the review period and reflected a slight downward trend in many counties.

Unemployment Rates – Chicago, IL CSA			
Area	**2024 Average**	**2025 Average**	**April 2026**
	%	**%**	**%**
Bureau County	5.8	5.2	4.7
Cook County	5.4	4.8	5.3
DeKalb County	4.7	4.5	4.3
DuPage County	4.3	3.9	4.2
Grundy County	5.3	4.7	4.5
Kane County	5.0	4.7	4.5
Kendall County	4.5	4.3	4.2
Lake County	5.0	4.7	4.5
LaSalle County	5.7	5.4	4.8
McHenry County	4.5	4.1	4.5
Putnam County	5.3	5.0	4.3
Will County	5.1	4.6	4.9
State of Illinois	5.0	4.6	4.7
National Average	4.0	4.3	4.0
Source: U.S. Bureau of Labor Statistics			

Major employers vary throughout the assessment area. Public employment within the Federal, State, and Local governments is common in portions of the area. According to Moody's, the top

private employers in the assessment area are Amazon, Advocate Health Care System, Northwestern Memorial Care, and University of Chicago. The economy is also highly dependent upon small businesses. Agriculture-related businesses are more prevalent in the rural portions of the assessment area.

Competition

The assessment area has a competitive market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, there were 152 financial institutions operating 2,040 offices within the assessment area. Heartland maintains a 0.3 percent deposit market share in the combined area, ranking 39th among all institutions. According to 2024 HMDA aggregate lending data, Heartland ranked 118th with a market share of 0.1 percent by number of loans among 835 lenders that reported home mortgage originations or purchases in the assessment area. According to 2024 CRA aggregate data, Heartland ranked 44th in small business lending in the assessment area. For small business lending, the bank had a 0.1 percent market share among the 246 reporting lenders. For small farm lending, Heartland had a 17.4 percent market share, ranking third among the 20 reporting lenders.

Community Contacts

Examiners reviewed four recently conducted contacts to assist in identifying credit needs and opportunities in the Chicago CSA. Two contacts were from economic development-focused organizations in the area and the two others focused primarily on housing and community services. In addition to the primary focus areas noted, the contacts also discussed local economic conditions and credit needs.

In general, the contacts expressed that economic and demographic characteristics vary widely throughout the area. Comments indicated that there is a sizable low- and moderate-income population throughout the area. The contacts all identified the need for affordable housing throughout the assessment area. One contact pointed out that there has been an increase in homelessness. They attributed this to some people experiencing a cascading effect from not being able to secure affordable housing after a significant event such as losing their job. Another contact noted that rising costs are taking a toll on residents, especially older adults. Another contact pointed out that rising interest rates and costs are making it hard for low- and moderate-income borrowers to purchase and improve homes, but also for developers to be able to build properties and maintain affordable prices/rents. Two of the contacts noted that there are some ruined commercial areas.

The contacts generally expressed that the banks in the area are responsive to local credit needs overall and help support economic stability and growth in the respective communities. One contact pointed out that there are fewer banks operating throughout the area than in the past, which has led to less involvement. Contacts also noted the need for financial literacy, especially for the unbanked and underbanked residents in the area.

Credit and Community Development Needs and Opportunities

Considering information from community contacts, bank management, and demographic and economic data, examiners determined that loans for low- and moderate-income individuals, small businesses, and small farms are important needs in the area. In particular, the percentage of low- and moderate-income families at 39.6 percent and 90.3 percent of businesses with GARs of $1 million or less in the assessment area support this conclusion. The contacts identified the need for affordable housing. Opportunities were identified for home mortgage lending, small business lending, economic development, and supporting community service organizations throughout the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CHICAGO CSA ASSESSMENT AREA

LENDING TEST

Heartland demonstrated good performance under the Lending Test in the Chicago CSA. This conclusion is primarily supported by good borrower profile penetrations and a relatively high level of community development loans.

Lending Activity

Heartland's lending performance reflects good responsiveness to area credit needs. From 2023 – 2025, this assessment area accounted for 35.8 percent of all reported lending, by number, and 43.9 percent by dollar volume; the highest of any assessment area. The most loans were made in this assessment area by loan type across all three product lines including 33.6 percent of small business lending, 45.7 percent of small farm lending, and 31.7 percent of all home mortgage lending. As noted previously, in 2024 the bank ranked 44th in market share for small business loans, 118th for home mortgage loans, and third for small farm loans in this assessment area, all based on number of loans. There were also more community development loans, by number and dollar volume, originated in this assessment area than any other area.

Some changes occurred during the period that could have impacted lending levels, including the relocation of one office in DeKalb and an LPO in Berwyn. Bank management explained that there have been some changes among lending staff throughout the review period, which may have had an impact as well. Although the same products and services are offered throughout the assessment areas, there are some portions of the area that have more activity for certain loan types. Specifically, small farm lending is the most prevalent in the Elgin MD and Ottawa MSA and small business and home mortgage lending was very limited in the Lake MD portion of the assessment area.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. Performance among all three product lines supports this conclusion. As previously detailed, low- and moderate-income census tracts are located in the numerous metropolitan areas throughout the

assessment area; however, the vast majority are located in Cook County. Outside of Cook County, the areas with the most moderate-income tracts include Kane (38 tracts), Lake (33 tracts), and Will County (32 tracts). The bank operates a limited number of offices in these counties. There are two offices in Kane county, including one that is in a moderate-income tract. There are three offices in Will County, and there is one office in Lake County. The bank operates one LPO in a moderate-income tract in Berwyn (Cook County). There is another LPO in Chicago, which is in proximity to some of the low- and moderate-income tracts in Central Cook County. In general, the offices in this assessment area are in closer proximity to moderate-income geographies. Additionally, the locations of the bank's newly added branches in the CSA and the limited time since the CNB acquisition in March 2026 were also considered during the review.

Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area, including low- and moderate-income census tracts. Although performance in both low- and moderate-income tracts trails comparative data, the dispersion of originated loans was generally reflective of where the bank's offices are located. It is noted that aggregate lending levels trail area demographics, which can be indicative of the challenges that all lenders face when lending in these areas. Additionally, the area demographics include all operations in the area, including those that may not have borrowing needs.

As detailed in the following table, approximately one percent of the bank's loans were made in low-income geographies in both 2024 and 2025. Although this level of lending trails aggregate lending levels, it is not considered unreasonable when considering the bank's locations and competition in the area. Activity in each assessment area that comprises the Chicago CSA reflects adequate performance. The greatest potential for lending in low-income tracts exists in the Chicago MSA due to having 94 percent of the tracts in the income category, and that is where all of the originations were from in 2024 and 2025. Additional low-income tracts are located in the Lake MD (13 tracts), and the Elgin MD (2 tracts). Area demographics revealed limited numbers of businesses in the low-income tracts in those areas, and aggregate lending levels were lower than the levels of businesses in both areas. The bank's lending levels are commensurate with their branch network and presence in these areas.

Lending opportunities are more prevalent in the moderate-income geographies throughout the area. Heartland's lending in moderate-income tracts was more disbursed throughout the CSA, with the exception of the Lake MD where no loans were originated in these geographies either year. Overall, lending levels in the moderate-income areas were slightly below aggregate lending levels in 2024 but were more comparable when reviewing each respective area; and showed improvement in 2025.

Geographic Distribution of Small Business Loans - Chicago CSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	5.4	4.1	4	1.4	2,120	3.3
2025	5.4	--	3	1.0	1,899	2.7
Moderate						
2024	17.1	16.1	39	13.6	12,015	18.9
2025	17.3	--	50	16.9	16,847	23.7
Middle						
2024	32.3	33.5	143	50.0	23,858	37.6
2025	32.2	--	141	47.6	18,853	26.5
Upper						
2024	44.7	46.0	100	35.0	25,521	40.2
2025	44.6	--	101	34.1	33,462	47.1
NA						
2024	0.5	0.4	0	0.0	0	0.0
2025	0.5	--	1	0.3	50	0.1
Total						
2024	**100.0**	**100.0**	**286**	**100.0**	**63,514**	**100.0**
2025	**100.0**	**--**	**296**	**100.0**	**71,111**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Home Mortgage Lending

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. As detailed in the following table, performance in low-income geographies was slightly below aggregate in 2024, followed by a slight decline in 2025. However, as shown in the table, the opportunities to lend in low-income tracts are nominal with only 4.4 percent of owner-occupied units, which is also consistent with the low level of aggregate lending.

Geographic Distribution of Home Mortgage Loans - Chicago CSA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	4.4	4.6	6	2.8	975	1.7
2025	4.4	4.6	5	1.7	697	1.0
Moderate						
2024	18.5	17.5	46	21.7	9,189	16.3
2025	18.5	16.6	41	14.3	9,569	13.3
Middle						
2024	37.6	36.9	116	54.7	14,918	26.4
2025	37.6	36.0	161	56.1	24,001	33.5
Upper						
2024	39.3	40.6	44	20.8	31,404	55.6
2025	39.3	42.3	79	27.5	37,386	52.1
NA 2024	0.2	0.3	0	0.0	0	0.0
2025	0.2	0.5	1	0.4	67	0.1
Total						
2024	**100.0**	**100.0**	**212**	**100.0**	**56,486**	**100.0**
2025	**100.0**	**100.0**	**287**	**100.0**	**71,720**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

A more detailed review of each of the assessment areas that comprise the CSA indicates that Heartland originated loans in the low-income geographies in each area and reflected performance that was comparable to aggregate lending levels in each area in 2024 and 2025. Heartland's lending levels in moderate-income geographies reflected higher penetration, exceeding aggregate lending levels in each assessment area comprising the CSA in both 2024 and 2025. Lending was particularly strong in the Chicago MSA in 2024, which is where the bank operates two LPOs to help meet the credit needs in the area.

Small Farm Lending

The geographic distribution of small farm loans reflects adequate penetration throughout the assessment area. As detailed in the following table, approximately 10 percent of all farming operations in the Chicago CSA are located in low- and moderate-income tracts. D&B data indicates most of the farming operations are in the Chicago MSA (4,634), followed by the Elgin MD (1,117), Ottawa MSA (878) and Lake MD (580). The bank's small farm lending was most prominent in the Ottawa MSA, which has no low-income and two moderate-income tracts. The Elgin MD had the second highest number of loans and includes two low- and 45 moderate-income tracts. Lending volume in the Chicago MSA was limited but considered adequate given the types of farming operations, their locations, and competition.

As detailed in the following table, there are very few farming operations in the low-income geographies in the area. Aggregate lending levels were also very low among all lenders. Lending operations are more prevalent in the moderate-income geographies but still limited. Heartland's lending levels trail aggregate lending levels and area demographics in moderate-income geographies but are considered adequate based on the limited lending opportunities, especially those within proximity of the bank's branches.

Geographic Distribution of Small Farm Loans - Chicago CSA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	1.6	0.6	0	0.0	0	0.0
2025	2.2	--	0	0.0	0	0.0
Moderate						
2024	7.1	4.5	4	1.7	239	0.6
2025	8.9	--	3	1.2	435	1.1
Middle						
2024	47.8	62.7	213	89.1	34,608	89.3
2025	44.5	--	220	88.0	35,338	87.8
Upper						
2024	43.5	32.1	22	9.2	3,919	10.1
2025	44.2	--	27	10.8	4,494	11.2
NA						
2024	0.1	0.2	0	0.0	0	0.0
2025	0.2	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**239**	**100.0**	**38,766**	**100.0**
2025	**100.0**	**--**	**250**	**100.0**	**40,267**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

A review of lending activity in moderate-income tracts indicates that lending levels in Elgin exceeded aggregate lending levels in 2024 and were similar in 2025. As a result, Heartland was the leading lender among six financial institutions in the area that made loans in these geographies. There was no lending in moderate-income tracts in Ottawa, but less than one percent of farms are in those geographies and aggregate lending data reflects no activity. Heartland's lending levels reflect an adequate penetration of loans commensurate with lending opportunities and the bank's ability to penetrate the respective areas based on office locations throughout the area.

Borrower Profile

The distribution of borrowers reflects good penetration among borrowers of different income levels and businesses and farms of different sizes in the assessment area. This conclusion is primarily supported by small farm and home mortgage lending performance, and small business lending provided additional support.

Small Business Lending

The distribution of small business loans reflects adequate penetration among businesses of different sizes. As detailed in the following table, 53.9 percent of Heartland's loans in 2024 were to businesses with gross annual revenues of $1 million or less, which is in line with aggregate lending levels with similar performance in 2025. A review of lending in the respective areas that comprise the CSA revealed adequate penetration. This level of lending evidences the bank's commitment in identifying and meeting the needs of small businesses in the area, which was identified as a credit need by community contacts.

Distribution of Small Business Loans by Gross Annual Revenue Category - Chicago CSA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	89.6	56.6	154	53.9	25,884	40.8
2025	90.3	--	156	52.7	31,205	43.9
> $1,000,000						
2024	3.6	--	93	32.5	29,108	45.8
2025	3.1	--	96	32.4	30,331	42.7
Revenue Not Available						
2024	6.8	--	39	13.6	8,522	13.4
2025	6.6	--	44	14.9	9,575	13.5
Total						
2024	**100.0**	**100.0**	**286**	**100.0**	**63,514**	**100.0**
2025	**100.0**	**--**	**296**	**100.0**	**71,111**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Home Mortgage Lending

The distribution of home mortgage loans to borrowers of different income levels, particularly low- and moderate-incomes, reflects good penetration. As detailed in the following table, lending levels to low- and moderate-income borrowers were both comparable to, and slightly exceeded, aggregate lending levels both years.

According to the 2020 Census, eight percent of families in the assessment area live below the poverty level, which can impact the demand and opportunities to lend to low-income borrowers. This is a factor considered when analyzing the bank's lending performance in the assessment area and may partially account for the difference between aggregate lending levels and area demographics. Despite these factors, Heartland's performance exceeded aggregate lending levels to low-income borrowers both years. Lending to moderate-income borrowers is also comparable to aggregate data for both years. The bank's performance was partially attributed to the use of flexible lending programs, including internally-developed programs, which are particularly beneficial to low- and moderate-income borrowers.

Distribution of Home Mortgage Loans by Borrower Income Level - Chicago CSA						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	22.9	7.2	21	9.9	1,842	3.3
2025	22.9	7.8	33	11.5	2,545	3.6
Moderate						
2024	16.7	19.6	43	20.3	5,972	10.6
2025	16.7	19.0	47	16.4	4,321	6.0
Middle						
2024	19.3	21.6	26	12.3	3,116	5.5
2025	19.3	20.7	48	16.7	6,424	9.0
Upper						
2024	41.0	33.4	35	16.5	7,080	12.5
2025	41.0	32.8	79	27.5	20,478	28.6
NA						
2024	0.0	18.3	87	41.0	38,476	68.1
2025	0.0	19.7	80	27.9	37,952	52.9
Total						
2024	**100.0**	**100.0**	**212**	**100.0**	**56,486**	**100.0**
2025	**100.0**	**100.0**	**287**	**100.0**	**71,720**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Small Farm Lending

The distribution of small farm loans to borrowers reflects excellent penetration among farms of different sizes. As reflected in the following table, Heartland's lending to farming operations with gross annual revenues of $1 million or less exceeded aggregate performance by 16.1 percent in 2025. Lending performance further increased by both number and dollar volume in 2025. The bank's performance resulted in ranking second in the combined Chicago CSA for lending to borrowers reporting revenues of $1 million or less. Among the areas comprising the CSA, the bank was the leading lender in both the Elgin and Ottawa areas and ninth in the Chicago MSA for lending to small farm borrowers in this income category.

Distribution of Small Farm Loans by Gross Annual Revenue Category - Chicago CSA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	97.4	58.4	178	74.5	25,554	65.9
2025	97.9	--	195	78.0	27,772	69.0
> $1,000,000						
2024	1.3	--	52	21.8	12,655	32.6
2025	0.9	--	43	17.2	11,427	28.4
Revenue Not Available						
2024	1.3	--	9	3.8	557	1.4
2025	1.2	--	12	4.8	1,068	2.7
Total						
2024	**100.0**	**100.0**	**239**	**100.0**	**38,766**	**100.0**
2025	**100.0**	**--**	**250**	**100.0**	**40,267**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.						

Innovative or Flexible Lending Practices

Heartland uses flexible lending practices to serve assessment area credit needs. As reflected in the following table, Heartland made or facilitated 437 flexible loans totaling $101.5 million. This is an increase from the previous evaluation when the bank made 205 flexible loans totaling $18.3 million. The majority of the loans by dollar amount were made through the Illinois Ag Invest program. All of these programs primarily benefit low- and moderate-income individuals and small businesses and farms throughout the assessment area.

Innovative or Flexible Lending Programs – Chicago CSA										
Program	**11/14/23-12/31/23**		**2024**		**2025**		**YTD 2026**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Home Possible	3	326	11	1,173	7	670	-	-	**21**	**2,169**
Home Ready	1	210	8	918	9	686	-	-	**18**	**1,814**
FHA	-	-	1	179	-	-	1	261	**2**	**440**
VA	-	-	-	-	1	244	-	-	**1**	**244**
Home Matters	3	465	22	3,866	19	3,342	3	440	**47**	**8,113**
Small Dollar Loans	4	2	24	20	22	19	4	3	**54**	**44**
Illinois Ag Invest	-	-	99	31,410	94	30,898	55	18,200	**248**	**80,508**
SBA	-	-	11	3,678	8	3,160	1	345	**20**	**7,183**
The Resurrection Project (Community 2nd)	-	-	14	513	12	459	-	-	**26**	**972**
Totals	**11**	**1,003**	**190**	**41,757**	**172**	**39,478**	**64**	**19,249**	**437**	**101,487**
Source: Bank Data										

Community Development Loans

Heartland made a relatively high level of community development loans in this assessment area. As reflected in the following table, the bank made 335 community development loans totaling $319.1 million in this assessment area during the evaluation period. This represents 41.9 percent of the bank's total qualified lending, by dollar volume. This level of lending is a significant increase, by number and dollar volume, since the previous evaluation when the bank made 155 loans totaling $245.7 million. This activity level also reflects a continuing upward trend for community development lending in this assessment area.

Given the heavier weighting placed on this assessment area, comparisons were also made to two similarly situated institutions with operations and headquarters in the Chicago CSA who also had performance evaluations conducted during the review period. Asset sizes of these institutions were between $7 billion and $10 billion and originated 37 community development loans totaling $99.8 million and 177 community development loans totaling $337.8, respectively in this assessment area and were considered to have high and relatively high levels of community development loans in this assessment area, which further supports the conclusions drawn.

Community Development Lending – Chicago CSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
11/14/23 - 12/31/23	13	1,538	-	-	4	7,105	-	-	**17**	**8,643**
2024	88	53,898	-	-	35	57,380	-	-	**123**	**111,278**
2025	91	34,901	1	4,050	56	129,436	-	-	**148**	**168,387**
YTD 2026	25	5,722	-	-	20	23,575	2	1,480	**47**	**30,777**
Total	**217**	**96,059**	**1**	**4,050**	**115**	**217,496**	**2**	**1,480**	**335**	**319,085**
Source: Bank Data										

Notable examples of the bank's community development loans originated in the assessment area include:

- A $9.7 million loan was extended to acquire a multi-family building located in a Community Preservation Area. This designation is made for communities experiencing a high risk of displacement of their existing low-income residents. Half of the units in this complex have rents below the fair market rent for the area, so a portion of this activity qualified in support of affordable housing.

- A $18.4 million loan was extended to support the redevelopment of a devastated area. The area is located in a TIF district and was designated for redevelopment as an industrial park. The property is located in close proximity to moderate-income geographies and is expected to attract new businesses that create permanent employment for residents in the area.

- A $7.2 million loan was extended for the acquisition of a strip mall. The building is home to restaurants, retail specialty shops, personal care, and fitness establishments, all of which employ low- and moderate-income individuals.

- Heartland continued to provide a $4 million revolving loan fund to a CDFI. The organization operates as a pooled risk lender that that primarily originates single and multi-family loans in low- and moderate-income tracts throughout the Chicago MSA. During the review period, the originated loans totaled approximately $1.7 million supporting affordable housing for area residents.

INVESTMENT TEST

Heartland demonstrated good performance under the Investment Test in the Chicago CSA assessment area. The level of qualified investments and good responsiveness to community development needs support this conclusion. This assessment area accounted for 35.9 percent of total qualified investments by dollar amount, ranking first among all areas.

Investment and Grant Activity

Heartland has an excellent level of qualified community investments and grants in this assessment area. As detailed in the following table, there were 325 qualified investments, grants, and donations totaling $108.1 million made during the evaluation review period. The investments and donation activity reflects an increase since the previous evaluation period when the bank made or held 258 qualified investments, grants, and donations totaling $104.0 million. A majority of the bank's investments remain in mortgage-backed securities that promote affordable housing and in municipal bonds that support various community service-related needs throughout the assessment area. Most of the investment activity includes prior-period investments that remain outstanding.

Given the heavier weighting placed on this assessment area, comparisons were also made to two similarly situated institutions with operations and headquarters in the Chicago CSA who also had performance evaluations conducted during the review period. Asset sizes of these institutions were between $7 billion and $10 billion with 184 community development investments totaling $30.4 million and 335 community development investments totaling $70.3, respectively in this assessment area and were assessed adequate and significantly high levels of community development investments, which further supports the conclusions drawn.

Qualified Investments – Chicago CSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	31	57,181	22	25,500	6	7,779	-	-	**59**	**90,460**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	**-**	**-**
2024	-	-	-	-	4	763	-	-	**4**	**763**
2025	4	1,509	1	655	2	1,388	-	-	**7**	**3,552**
YTD 2026	2	361	15	11,635	1	245	1	740	**19**	**12,981**
Subtotal	**37**	**59,051**	**38**	**37,790**	**13**	**10,175**	**1**	**740**	**89**	**107,756**
Qualified Grants & Donations	76	214	146	141	13	24	1	1	**236**	**380**
Total	**113**	**59,265**	**184**	**37,931**	**26**	**10,199**	**2**	**741**	**325**	**108,136**
Source: Bank Data										

Notable examples of qualified investments made or maintained by the bank during the current review period include:

- Heartland purchased six mortgage-backed securities that are collateralized by government-secured mortgages. The mortgages total almost $2 million dollars and were all for low- and moderate-income borrowers in the Ottawa-Peru Micropolitan Area. All three counties in this Micropolitan area were designated as distressed due to unemployment in 2024, which makes these investments particularly impactful to the needs in the area.

- The bank purchased a bond for approximately $700,000 that helps revitalize and stabilize a portion of Cook County. A majority of the residents in all but one of the 16 census tracts in the assessment area have low- or moderate-incomes and the Consolidated Plan identified needs for essential infrastructure and public facilities, which is one of the primary purposes of this investment.

- A $1.2 million general obligation bond was purchased from a school where a majority of students qualify for free or reduced lunches. The bond operating expenses.

- Heartland provided $12,000 in financial support to a local organization that provides temporary housing and programs that help area residents transition to permanent housing. Services include daytime support programs, food security initiatives, and assistance focused on various personal situations including aging residents and those who have experienced domestic violence.

Responsiveness to Credit and Community Development Needs

Heartland exhibits good responsiveness to credit and community economic development needs in the assessment area. Investments and grants made were consistent with the needs of the assessment area. A majority of the qualified investments and grants, by number and dollar volume, have supported community services, economic development, and affordable housing, which are needs identified during the current evaluation period.

Community Development Initiatives

The bank occasionally uses innovative or complex investments to support community development initiatives. As previously mentioned, Heartland developed the Home Matters downpayment assistance grant program that is targeted to assist low- and moderate-income borrowers and geographical areas. The bank still continues its small dollar loan program. Most of the downpayment grants benefited borrowers in the Chicago CSA. The other investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

The service performance reflects good responsiveness to the credit and community development needs in the Chicago CSA. Performance across each of the Service Test criteria supports this

conclusion. The area had the highest qualified service activity at 36.3 percent, and is home to 31.8 percent of the bank's offices, which is more than any other assessment area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of this assessment area. As reflected in the following table, Heartland operates 27 offices, and 28 ATMs in the Chicago CSA. There are also two LPOs (not included in the table). As previously explained, low- and moderate-income census tracts are located in the numerous metropolitan areas throughout the assessment area; however, the vast majority are in Cook County. Heartland operates five branches with ATMs and two LPOs in Cook County; three offices are in middle-income tracts and two are in upper-income tracts. One of the offices is immediately adjacent to a low-income geography. Outside of Cook County, the area with the most low-income tracts is Lake County. Heartland operates one office in Lake County, and it is not in close proximity to the low-income geographies. Despite not having any offices in low-income geographies, some of Heartland's offices are within close proximity as are numerous other financial institutions.

Moderate-income tracts are also the most prevalent in Cook County. Heartland does not operate any offices in these geographies in Cook County. Outside of Cook County, the areas with the most moderate-income tracts include Kane (38 tracts), Lake (33 tracts), and Will County (32 tracts). The bank operates a limited number of offices in these counties. There are two offices in Kane County, including one that is in a moderate-income tract. The remaining offices in Will and Lake Counties are in middle- and upper-income tracts.

The bank operates one LPO in a moderate-income tract in Berwyn (Cook County). There is another LPO in Chicago, which is in proximity to some of the low- and moderate-income tracts in Central Cook County. The lender in the Berwyn LPO is bilingual and has provided financial education programs for Spanish speaking individuals in the area.

All of the census tracts in Bureau and LaSalle Counties were designated as distressed in 2024 due to unemployment. Heartland operates six branches with ATMs in these areas. Specifically, there are four offices in Bureau County and two in LaSalle County. The accessibility to these branches was particularly impactful to area residents during this time.

Although the bank's branch distribution through low- and moderate-income geographies trails the respective levels of census tracts and population in those respective tracts the offices are in relatively close proximity and there are numerous other financial institutions in both areas to help serve local residents. Additionally, the bank continues to offer a variety of alternative delivery systems that increase the availability of its loan and deposit products. Most of these delivery systems utilize technology to provide customers with 24-hour access to bank accounts and product information. The bank offers an internet and mobile banking service to pay bills and transfer funds.

Branch and ATM Distribution by Geography Income Level - Chicago CSA								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	247	11.5	785,144	8.8	-	-	-	-
Moderate	489	22.8	2,005,363	22.6	3	11.1	3	16.6
Middle	696	32.5	3,059,978	34.5	18	66.7	19	71.4
Upper	687	32.0	2,975,222	33.5	6	22.2	6	21.4
NA	26	1.2	53,520	0.6	-	-	-	-
Total	**2,145**	**100.0**	**8,879,227**	**100.0**	**27**	**100.0**	**28**	**100.0**
Sources: 2020 Census Data and Bank Records								

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income census tracts or to low- and moderate-income individuals. Since the prior evaluation, Heartland added three branches in Cook County through the 2026 acquisition. These offices are all within relatively close proximity to some of the low- and moderate-income geographies and will help the bank better serve those areas. The bank also relocated one branch in DeKalb County and relocated one LPO in Cook County. The new branches are all in middle- or upper-income tracts, the branch relocation was within the same middle-income tract, and the LPO relocated within the same moderate-income tract.

Reasonableness of Business Hours and Service

Services and business hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts and/or individuals. The bank's operating hours and services do not significantly vary among offices. Most branch locations are equipped with ATMs and have drive-up facilities. While there are slight differences noted among offices, none of them vary in a way that inconveniences any portions of the assessment area.

Community Development Services

Heartland provides a relatively high level of community development services. As detailed in the following table, 389 community development services were provided in this assessment area. The services in this assessment area account for 36.3 percent of the institution's total qualified activities during this review period.

Community Development Services – Chicago CSA					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
11/14/23-12/31/23	6	15	-	-	**21**
2024	63	85	4	-	**152**
2025	61	95	6	-	**162**
YTD 2026	8	44	2	-	**54**
Total	**138**	**239**	**12**	**-**	**389**
Source: Bank Data					

The level of qualified services performed by bank staff is very comparable to the previous review period, but there was an increase in the number of financial literacy courses provided. Bank staff reported just over 320 hours for financial literacy courses, which is twice as high as the previous review period. Part of the increase in financial literacy courses is attributed to the bank's relationships with local organizations, as well as the regularly recurring courses provided by bank staff for programs such as Heartland's Money Matters class. Other notable examples include:

- An employee provides technical and financial expertise while serving on the Board and Finance Committee of a local community service organization that focuses on addressing homelessness and housing stability in Cook County. The organization provides case management, a daytime support center, permanent supportive housing, and transitional housing programs. In addition, bank staff members have provided financial education courses on multiple occasions throughout the review period.

- An employee serves on the Board of Directors and provides professional and technical assistance to a local organization that promotes economic development in Dekalb County.

- Heartland utilized several down payment assistance programs in the assessment area including 41 FHLBC DPP grants totaling $405,000; 32 Borrow Smart grants totaling $56,000; 51 Home Matters Grants totaling $95,000; eight IHDA grants totaling $136,000; and one SEIP grant for $60,000. For each grant awarded, a bank employee provides technical assistance through preparation of the grant application.

ILLINOIS NON-MSA – Full Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ILLINOIS NON-MSA ASSESSMENT AREA

Heartland's designated assessment area includes ten counties in nonmetropolitan areas of central and southern Illinois. These counties are not contiguous but are adjacent to other MSA assessment areas. Collectively, the bank operates 14 branches and 20 ATMs in the Illinois Non-MSA. The current Illinois Non-MSA designated areas include the following: Adams, Greene, Morgan, Pike, and Scott Counties. This contiguous five county area is on the western edge of the state and is located north of the St. Louis MSA and west of the Springfield MSA. The bank operates seven branches throughout the area.

Christian and Montgomery Counties: This two-county area is located immediately south of the Springfield and Decatur MSAs, and east of the St. Louis MSA. The bank operates three branches within these two contiguous counties.

Logan, DeWitt, and Livingston Counties: This three-county area surrounds the Bloomington MSA. Livingston County is located north of the Bloomington MSA and DeWitt and Logan are located to the south. The area is also bordered by the Champaign MSA to the southeast and the Chicago CSA to the northwest. Heartland operates four offices throughout the southern portion of this area as there are no offices in Livingston County.

These areas were analyzed separately, and generally consistent performance was observed; therefore, demographic information and details of the bank's performance were combined and presented collectively as the Illinois Non-MSA assessment area. As of June 30, 2025, this assessment area accounted for 11.4 percent of the bank's deposits, which is the fourth highest of all the bank's Illinois assessment areas. From 2023-2025, 8.6 percent of reported loans were originated in this assessment area, which is the third highest penetration of all the Illinois assessment areas.

The Illinois Non-MSA has had several changes since the previous evaluation, which are detailed in the following table. Additionally, there were changes that occurred immediately prior to the previous evaluation that resulted in some portions of the area being reviewed for the first time during this review period. Changes during this review period include the addition of Christian, Greene, Montgomery, Pike, and Scott Counties due to the CNB acquisition in March 2026. Some portions of the area were designated as distressed and/or underserved in 2025 and 2026, and there were some counties impacted by the OMB Circular 23-01 that became effective in 2024. The most notable change from the OMB Circular included Ford County being designated as part of the Champaign MSA instead of being a nonmetropolitan area.

Census Tract Changes – IL Non-MSA						
County	**Status during this review period**	**2020 Census - Tract Income Levels**	**2024 Tract Income Levels**	**Distressed and Underserved Tracts/Reason**	**Branches**	**Branch Changes**
Adams	Existing	Low (2), Moderate (2), Middle (12), Upper (3)	CT 104 went from Middle to Upper		1 (Middle)	
Christian	Added	Moderate (2), Middle (6), Upper (2)			1 (Moderate)	1 Acquired 3/1/2026
DeWitt	Existing	Middle (3), Upper (2)		2025 and 2026 Underserved – Remote Rural 9715, 9717, 9718	2 (1 Middle, 1 Upper)	1 Closed 2/20/2026
Greene	Added	Moderate (2), Middle (2), Upper (1)	9738 went from Middle to Upper	2025 and 2026 Distressed – Population Loss 9736, 9740	1 (Middle)	1 Acquired 3/1/2026
Livingston	Existing	Moderate (1), Middle (6), Upper (3)	9602 and 9604 went from Middle to Upper			
Logan	Existing	Middle (4), Upper (4)			2 (Middle)	2 Closed 3/22/2024
Montgomery	Added	Middle (7), Upper (1)			2 (Middle)	2 Acquired 3/1/2026

Census Tract Changes – IL Non-MSA						
County	**Status during this review period**	**2020 Census - Tract Income Levels**	**2024 Tract Income Levels**	**Distressed and Underserved Tracts/Reason**	**Branches**	**Branch Changes**
Morgan	Existing	Moderate (3), Middle (6), Upper (1)			4 (2 Moderate, 1 Middle, 1 Upper)	3 Acquired 3/1/2026
Pike	Added	Middle (5)		2025 and 2026 Distressed – Population Loss and Underserved – Remote Rural 9524, 9525, 9526, 9527, 9528	1 (Middle)	1 Acquired 3/1/2026
Scott	Added	Middle (2)				
Source: Bank data, FFIEC						

Numerous branch changes occurred prior to, and during, this review period, which are also detailed in the table above and in the Changes in Branch Locations section. Throughout the review period, the bank generally operated one office in Adams County (Quincy), three offices in DeWitt County (two in Clinton and one in Farmer City), four offices in Logan County (Lincoln), and one office in Morgan County (Jacksonville).

Economic and Demographic Data

This assessment area includes all 82 census tracts that comprise the IL Non-MSA assessment area. According to 2020 Census data, these tracts reflect the following income designations for the combined area: 2 low-income, 10 moderate-income, 53 middle-income, and 17 upper-income. Additional demographic information about the area is shown in the following table.

Demographic Information of the Assessment Area - IL Non-MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	82	2.4	12.2	64.6	20.7	0.0
Population by Geography	271,963	1.4	10.7	65.8	22.2	0.0
Housing Units by Geography	126,785	1.9	11.3	66.0	20.9	0.0
Owner-Occupied Units by Geography	81,838	0.8	8.6	67.3	23.4	0.0
Occupied Rental Units by Geography	29,788	3.9	16.9	63.5	15.7	0.0
Vacant Units by Geography	15,159	4.2	14.3	63.8	17.7	0.0
Businesses by Geography	20,348	4.1	10.7	62.8	22.4	0.0
Farms by Geography	2,176	0.3	2.4	66.3	31.0	0.0
Family Distribution by Income Level	70,272	18.7	17.4	21.7	42.2	0.0
Household Distribution by Income Level	111,626	22.5	16.2	17.9	43.5	0.0
Illinois Non-MSA Median Family Income		$67,835	Median Housing Value			$ 110,259
			Median Gross Rent			$684
			Families Below Poverty Level			8.9%
Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The bank's performance under the geographic distribution criterion was compared to the respective area demographics and aggregate lending data for each product line. These characteristics provide some insight into the credit needs and demand in low- and moderate-income geographies, which are considered when evaluating geographic lending patterns. Performance under the borrower profile criterion also compares the respective area demographics and aggregate lending data for each product line. The 2024 and 2025 FFIEC-updated median family income levels are used to analyze home mortgage loans under this criterion and are included in the following table.

Estimated Median Family Income Ranges - IL Non-MSA					
Year	**MFI**	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Median Family Income For Illinois Non-MSA					
2024	$ 82,800	< $41,400	$41,400 to < $66,240	$66,240 to < $99,360	>= $99,360
2025	$ 86,600	< $43,300	$43,300 to < $69,280	$69,280 to < $103,920	>= $103,920
Source: FFIEC					

According to 2025 D&B data, the assessment area contains 20,348 non-farm businesses with the following gross annual revenues: 81.1 percent reported $1 million or less, 4.0 percent have more than $1 million, and 14.9 percent have unknown revenues. Farming operations are also prevalent in the more rural portions of the assessment area. The assessment area contains 2,176 farming operations, and 98.5 percent reported revenues of $1 million or less.

Service industries represent the largest portion of businesses in the assessment area at 17.3 percent; followed by agriculture, forestry, and fishing (9.7 percent) and retail trade (9.4 percent). In addition, 70.0 percent of assessment area businesses have four or fewer employees, and 86.1 percent operate from a single location. According to local economic development organizations throughout the assessment area, major employers vary, often related to differences in whether the local and nearby areas are more rural or urban in nature. The healthcare sector is a common employer throughout the area, as are education and government employment through State and local agencies. Manufacturing is common in some areas, particularly those that are located close to rivers, rails, and highway transportation. Agriculture is prevalent in many of these more rural areas and there are many agriculture-related businesses that provide employment for area residents. Residents of smaller communities also travel to nearby urban areas that provide greater employment opportunities. As detailed in the following table, unemployment rates in most of the counties in the assessment area remain similar to the state and national unemployment rates.

Unemployment Rates –Illinois Non-MSA			
	2024	**2025**	**April 2026**
Area	**%**	**%**	**%**
Adams County	3.6	3.5	3.1
Christian County	4.3	4.3	4.2
DeWitt County	4.3	3.9	3.7
Greene County	4.0	3.9	3.5
Livingston County	4.1	4.0	3.6
Logan County	4.9	4.1	4.4
Montgomery County	4.6	4.6	4.1
Morgan County	4.3	4.1	3.8
Pike County	4.7	4.7	4.0
Scott County	5.2	4.9	4.4

Unemployment Rates –Illinois Non-MSA			
	2024	2025	April 2026
Area	**%**	**%**	**%**
State of Illinois	5.0	4.6	4.7
National Average	4.0	4.3	4.0
Source: U.S. Bureau of Labor Statistics			

Competition

The assessment area has a competitive market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, there were 58 financial institutions operating 162 offices within the assessment area. Heartland maintains a 5.7 percent deposit market share in the combined area, ranking fourth among all institutions. According to 2024 HMDA aggregate lending data, Heartland ranked 20th with a market share of 1.4 percent by number of loans among 244 lenders that reported home mortgage originations or purchases in the assessment area. According to 2024 CRA aggregate data, Heartland ranked 10th in small business lending with a 2.7 percent market share among the 67 reporting lenders. For small farm lending, Heartland had a 7.9 percent market share, ranking 5th among the 27 reporting lenders.

Community Contacts

Examiners reviewed five recently conducted community contacts to assist in identifying credit needs and opportunities throughout the Illinois Non-MSA. Representatives primarily focused on Greene, Livingston, Morgan, Scott, Logan, and Adams Counties. Two contacts were from economic development organizations in the area and the other focused primarily on housing and community services. In addition to the specific geographies and primary focus areas noted, the contacts also discussed local credit needs and economic conditions, and housing trends.

All of the contacts explained that the local economies seem to be recovering from a downturn during the pandemic. The comments generally indicate that the communities are seeing more of an aging population and some residents are leaving for education and job opportunities and not returning. Three of the contacts specifically noted that many residents commute to the larger urban areas nearby for employment. Another contact noted the need for an adequate and skilled job force as well as job creation. A contact noted that more people are entering the workforce due to higher prices, but pointed out that there is a childcare shortage, which has presented challenges.

All of the contacts identified the need for affordable housing throughout the assessment area. They noted that the supply of low- and moderately-priced housing is very limited, and that there has been minimal new construction development. One contact that works with a local housing authority noted that demand has been steady over the last few years and is consistently higher than before the pandemic.

The contacts noted that businesses in the community are generally doing well. One contact noted there have been new manufacturing and retail businesses that have opened, and another noted that small business lending continues to be a credit need. Further, in addition to larger farming operations, many communities in the area have farmers markets and very small farming operations. One of the contacts identified a need for increased financial literacy, including establishing and

repairing credit. The contacts stated that the banks in the area are responsive to local credit needs overall and help support economic stability and growth in the respective communities.

Credit and Community Development Needs and Opportunities

Considering information from community contacts, bank management, and demographic and economic data, examiners determined that loans for low- and moderate-income individuals, small businesses, and small farms are important needs in the area. In particular, the percentage of low- and moderate-income families at 36.0 percent, 81.1 percent of businesses and 98.5 percent of farms with GARs of $1 million or less in the assessment area support this conclusion. The need for affordable housing was the most prevalent need identified by the contacts. Opportunities were identified for small business lending, economic development, and supporting community service organizations throughout the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ILLINOIS NON-MSA ASSESSMENT AREA

LENDING TEST

Heartland demonstrated adequate performance under the Lending Test in the Illinois Non-MSA.

Lending Activity

Heartland's lending performance reflects adequate responsiveness to area credit needs. Good borrower profile performance, adequate geographic distribution of home mortgage and small farm loans, and adequate level of community development loans support this conclusion. According to the bank's reported CRA and HMDA loan data from 2023 – 2025, this area accounted for the third highest share of lending at 8.6 percent, by dollar volume. As noted previously, in 2024 the bank ranked 10th in market share for small business loans, 20th for home mortgage loans, and 5th for small farm loans in this assessment area, all based on number of loans. Also, 6.3 percent of all community development lending occurred in this assessment area.

There were some variances in loan volume by product, mainly due to the differences between the urban and rural areas. The analysis of retail lending activity placed an emphasis on activity using the delineated assessment areas during the review period that corresponds to the reported loan data, which include Adams, DeWitt, Livingston, Logan, and Morgan Counties.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. Performance among home mortgage, small farm, and small business lending supports this conclusion. The two low-income census tracts in the assessment area are located in Adams County. The bank's Quincy office is located approximately two miles east of these tracts. Throughout the review period, there were six moderate-income geographies located in Adams (two tracts), Livingston (one tract), and Morgan (three tracts) counties. Adams and Morgan Counties were added to the assessment area during the 2023 acquisition that occurred immediately prior to the

previous review period. Heartland operates one office in each county. There is also a moderate-income tract in Livingston, where the bank does not have a branch presence.

Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area, including low- and moderate-income census tracts. The bank has not had dedicated lenders in the Adams and Morgan County offices during the review period, which may have impacted the level of penetration in these areas. In addition, there are limited opportunities to lend to small businesses in low- and moderate-income census tracts in this assessment area.

Heartland did not originate any small business loans in the low-income tracts either year. However, the opportunities to lend are nominal as there are only 4.1 percent of businesses operating in low-income tracts, which is indicative of the low volume of reported aggregate lending activity. Lending opportunities and activity were more prevalent in the moderate-income geographies in the area. During the review period, the bank made eight loans within both years in the assessment area. The loan distribution included the two counties with moderate-income geographies where the bank has offices. While the bank's lending levels were slightly below the low volume of reported aggregate data, the opportunities to lend are also low. As such, given these factors, the overall performance is adequate..

Geographic Distribution of Small Business Loans - IL Non-MSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	4.1	4.3	0	0.0	0	0.0
2025	4.1	--	0	0.0	0	0.0
Moderate						
2024	11.1	8.4	5	6.7	1,261	8.3
2025	10.7	--	3	5.8	746	8.5
Middle						
2024	62.4	63.3	48	64.0	9,706	63.9
2025	62.8	--	33	63.5	4,744	54.0
Upper						
2024	22.3	24.0	22	29.3	4,227	27.8
2025	22.4	--	16	30.8	3,292	37.5
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**75**	**100.0**	**15,194**	**100.0**
2025	**100.0**	**--**	**52**	**100.0**	**8,782**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Home Mortgage Lending

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. As detailed in the following table, there is a limited level of owner-occupied housing located in the low- and moderate-income portions of the assessment area. Heartland's lending performance in low-income tracts was comparable to aggregate lending levels and area demographics for both years.

The bank's lending levels in moderate-income geographies exceeded aggregate lending levels in 2024 then decreased in 2025 but remained comparable. Lending levels for the current assessment area are included in the following table. Lending levels were also reviewed for activity conducted during the review period in the assessment area, which revealed comparable lending levels that were slightly lower than aggregate in 2025. Lending performance in the assessment area is adequate, especially when considering the demographics of each respective area and the recency of the previous merger.

Geographic Distribution of Home Mortgage Loans - IL Non-MSA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	0.8	0.7	1	1.7	74	1.0
2025	0.8	0.8	0	0.0	0	0.0
Moderate						
2024	8.6	9.7	8	13.6	629	8.2
2025	8.6	8.7	5	5.5	283	3.6
Middle						
2024	67.3	66.5	42	71.2	5,557	72.8
2025	67.3	64.4	48	52.8	4,303	54.9
Upper						
2024	23.4	23.2	8	13.6	1,373	18.0
2025	23.4	26.1	38	41.8	3,256	41.5
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**59**	**100.0**	**7,633**	**100.0**
2025	**100.0**	**100.0**	**91**	**100.0**	**7,842**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%.						

Small Farm Lending

The geographic distribution of small farm loans reflects adequate penetration throughout the assessment area. As detailed in the following table, very few farming operations are located in the low- and moderate-income geographies in this assessment area. Less than one percent of farms are located in low-income geographies and similar to Heartland, aggregate lending data reflects no activity in these areas. Heartland's lending in moderate-income tracts is also comparable to aggravated lending levels in 2024 and area demographics for both years. Heartland ranked 4th out of eight lenders with originations in moderate-income tracts. Given the limited opportunities to lend to farming operations in the low- and moderate-income geographies, the bank's performance is considered adequate.

Geographic Distribution of Small Farm Loans - IL Non-MSA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	0.3	--	0	0.0	0	0.0
2025	0.3	--	0	0.0	0	0.0
Moderate						
2024	2.1	1.2	1	1.1	40	0.3
2025	2.4	--	2	2.9	75	0.7
Middle						
2024	66.2	69.4	29	33.0	5,823	36.3
2025	66.3	--	15	21.7	2,106	18.3
Upper						
2024	31.4	29.4	58	65.9	10,192	63.5
2025	31.0	--	52	75.4	9,303	81.0
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**88**	**100.0**	**16,055**	**100.0**
2025	**100.0**	**--**	**69**	**100.0**	**11,484**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Borrower Profile

The distribution of borrowers reflects good penetration among borrowers of different income levels and businesses and farms of different sizes in the assessment area. This conclusion is primarily supported by small business and small farm lending performance, but home mortgage lending provided additional support.

Small Business Lending

The distribution of small business loans reflects adequate penetration among businesses of different sizes in both 2024 and 2025. As detailed in the following table, Heartland's level of loans to businesses with gross annual revenues of $1 million or less was comparable to aggregate lending levels in 2024 and remained similar in 2025.

Distribution of Small Business Loans by Gross Annual Revenue Category - IL Non-MSA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	80.3	55.2	41	54.7	5,775	38.0
2025	81.1	--	30	57.7	2,560	29.2
> $1,000,000						
2024	4.3	--	26	34.7	8,734	57.5
2025	4.0	--	18	34.6	6,014	68.5
Revenue Not Available						
2024	15.4	--	8	10.7	685	4.5
2025	14.9	--	4	7.7	208	2.4
Total						
2024	**100.0**	**100.0**	**75**	**100.0**	**15,194**	**100.0**
2025	**100.0**	**--**	**52**	**100.0**	**8,782**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.						

Home Mortgage Lending

The distribution of home mortgage loans to borrowers of different income levels, particularly low- and moderate-incomes, reflects good penetration. According to the 2020 Census, a total of 8.9 percent of families in the assessment area live below the poverty level. The ability to qualify for a home mortgage loan, particularly under conventional financing would be challenging, which limits the demand and opportunity to lend to these lower-income families. This is a factor considered when analyzing the bank's lending performance in the assessment area and may partially account for the difference between aggregate lending levels and area demographics. Despite these factors, Heartland's performance exceeded aggregate lending levels for low-income borrowers both years. Similarly, lending levels to moderate-income borrowers exceeded both aggregate lending levels and area demographics in both 2024 and 2025.

Distribution of Home Mortgage Loans by Borrower Income Level - IL Non-MSA						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	18.7	10.0	11	18.6	657	8.6
2025	18.7	11.0	12	13.2	590	7.5
Moderate						
2024	17.4	24.6	16	27.1	1,696	22.2
2025	17.4	23.6	23	25.3	1,694	21.6
Middle						
2024	21.8	21.7	10	17.0	1,290	16.9
2025	21.7	21.3	21	23.1	1,690	21.6
Upper						
2024	42.2	25.5	18	30.5	3,384	44.3
2025	42.2	27.1	31	34.1	3,554	45.3
NA						
2024	0.0	18.2	4	6.8	606	7.9
2025	0.0	17.0	4	4.4	314	4.0
Total						
2024	**100.0**	**100.0**	**59**	**100.0**	**7,633**	**100.0**
2025	**100.0**	**100.0**	**91**	**100.0**	**7,842**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%.						

Small Farm Lending

The distribution of small farm loans to borrowers reflects excellent penetration among farms of different sizes. As reflected in the following table, Heartland's lending to farming operations with gross annual revenues of $1 million or less exceeded aggregate performance by 13.7 percent in 2024 and increased in 2025. Heartland ranked 2nd in lending to farming operations of this size with an 18.9 percent market share in 2024 based on the assessment area delineation at that time.

Distribution of Small Farm Loans by Gross Annual Revenue Category - IL Non-MSA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	98.4	57.9	63	71.6	9,714	60.5
2025	98.5	--	54	78.3	7,996	69.6
> $1,000,000						
2024	0.6	--	19	21.6	4,909	30.6
2025	0.6	--	12	17.4	3,378	29.4
Revenue Not Available						
2024	1.0	--	6	6.8	1,432	8.9
2025	0.9	--	3	4.4	110	1.0
Total						
2024	**100.0**	**100.0**	**88**	**100.0**	**16,055**	**100.0**
2025	**100.0**	**--**	**69**	**100.0**	**11,484**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Innovative or Flexible Lending Practices

Heartland uses flexible lending practices to serve assessment area credit needs. As reflected in the following table, Heartland originated 153 flexible loans totaling $44.5 million. The majority of the loans by dollar amount were made through the Illinois Ag Invest program. All of these programs primarily benefit low- and moderate-income individuals and small businesses and farms throughout the assessment area.

Innovative or Flexible Lending Programs – IL Non-MSA										
Program	**11/14/23-12/31/23**		**2024**		**2025**		**YTD 2026**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Home Possible	-	-	1	42	-	-	-	-	**1**	**42**
Home Ready	-	-	9	664	4	361	1	53	**14**	**1,078**
FHA	-	-	3	360	4	518	1	114	**8**	**992**
USDA	-	-	7	802	-	-	-	-	**7**	**802**
VA	1	158	3	469	-	-	-	-	**4**	**627**
Small Dollar Loans	-	-	4	3	8	7	3	3	**15**	**13**
Illinois Ag Invest	-	-	30	13,625	28	12,045	44	14,356	**102**	**40,026**
SBA	1	81	1	868	-	-	-	-	**2**	**949**
Totals	**2**	**239**	**58**	**16,833**	**44**	**12,931**	**49**	**14,526**	**153**	**44,529**
Source: Bank Data										

Community Development Loans

Heartland made an adequate level of community development loans in this assessment area. As reflected in the following table, the bank made 28 community development loans totaling $48.3 million in this assessment area during the evaluation period. This represents 6.3 percent of the bank's total qualified lending, by dollar volume. This level of lending is an increase, by number

and dollar volume, since the previous evaluation when the bank made three loans totaling $1.4 million.

Community Development Lending – IL Non-MSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
11/14/23 - 12/31/23	-	-	-	-	1	1,820	-	-	**1**	**1,820**
2024	1	98	-	-	6	20,610	-	-	**7**	**20,708**
2025	-	-	-	-	11	17,135	-	-	**11**	**17,135**
YTD 2026	-	-	-	-	8	6,650	1	2,000	**9**	**8,650**
Total	**1**	**98**	**-**	**-**	**26**	**46,215**	**1**	**2,000**	**28**	**48,313**
Source: Bank Data										

Notable examples of the bank's community development loans originated in the assessment area include:

- A $1.8 million loan was made to finance the acquisition of a building for use by an agricultural-related company. This business provides employment opportunities for area residents, with a majority earning low- and moderate-income wages.

- The bank originated a $3.4 million loan to finance the acquisition and improvements for a manufacturing business located in a distressed middle-income tract. This activity will help support economic development in that area and retain low- and moderate-income positions for area residents.

INVESTMENT TEST

Heartland demonstrated adequate performance under the Investment Test in the Illinois Non-MSA assessment area. The bank's adequate level of qualified investments and responsiveness to community development needs supports this conclusion. This assessment area accounted for 6.1 percent of total qualified investments by dollar volume, ranking fourth among all areas.

Investment and Grant Activity

Heartland has an adequate level of qualified community investments and grants in this assessment area. As detailed in the following table, there were 67 qualified investments, grants, and donations totaling $18.3 million. This level of activity represents 6.1 percent of the bank's total community development investment activity, by dollar amount. The investment and donation activity during this review period reflects a notable increase since the previous evaluation period when the bank made or held 27 qualified investments, grants, and donations totaling $1.7 million. A majority of the bank's investments remain in mortgage-backed securities that promote affordable housing and in municipal bonds that support various community service-related needs throughout the assessment area. Most of the investment activity includes prior period investments, including some bonds that were held by CNB prior to the 2026 acquisition that were still outstanding at the date of this evaluation.

Qualified Investments – IL Non-MSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	4	9,702	9	5,364	-	-	-	-	**13**	**15,066**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	**-**	**-**
2024	-	-	-	-	-	-	-	-	**-**	**-**
2025	4	634	-	-	-	-	-	-	**4**	**634**
YTD 2026	1	147	5	2,450	-	-	-	-	**6**	**2,597**
Subtotal	**9**	**10,483**	**14**	**7,814**	-	-	-	-	**23**	**18,297**
Qualified Grants & Donations	6	5	34	25	4	2	-	-	**44**	**32**
Total	**15**	**10,488**	**48**	**7,839**	**4**	**2**	**-**	**-**	**67**	**18,329**
Source: Bank Data										

Notable examples of qualified investments made or maintained by the bank during the current review period include:

- Heartland purchased five mortgage-backed securities that are collateralized by government-secured mortgages. The mortgages total approximately $80,000 dollars and were all for low- and moderate-income borrowers. One of the mortgages was originated in DeWitt County, which was designated as an underserved remote rural area in 2025 and makes these investments particularly impactful to the needs throughout this area.

- The bank held an $8.0 million security collateralized by a LIHTC project involving a 200-unit affordable housing project in the assessment area. The units in this development have rents below the fair market rents for the area.

- The bank made donations totaling over $5,000 to local YMCA/YWCA programs that are designed to help subsidize those in the community who need assistance with membership and program participation.

Responsiveness to Credit and Community Development Needs

Heartland exhibits adequate responsiveness to credit and community economic development needs in the assessment area. Investments and grants made were consistent with the needs of the assessment area. A majority of the qualified investments and grants, by number and dollar volume, have supported community services, economic development, and affordable housing, which are needs identified during the current evaluation period.

Community Development Initiatives

The bank rarely uses innovative or complex investments to support community development initiatives. The investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

The service performance reflects adequate responsiveness to the credit and community development needs in the Illinois Non-MSA. Performance across each of the Service Test criteria supports this conclusion. The area had the fifth highest amount of qualified service activity (6.7 percent) and is home to 16.5 percent of the bank's offices.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of this assessment area. As reflected in the following table, Heartland operates 14 offices and 20 ATMs in this assessment area.

Branch and ATM Distribution by Geography Income Level - IL Non-MSA								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2	2.4	3,698	1.4	-	-	-	-
Moderate	10	12.2	28,951	10.7	3	21.4	4	20.0
Middle	53	64.6	178,991	65.8	9	64.3	13	65.0
Upper	17	20.7	60,323	22.2	2	14.3	3	15.0
NA	-	-	-	-	-	-	-	-
Total	**82**	**100.0**	**271,963**	**100.0**	**14**	**100.0**	**20**	**100.0**
Source: 2020 Census Data and Institution Records								

The previous table reflects that, by percentage, the distribution of Heartland's offices in low- and moderate-income census tracts is comparable to, or exceeds, the population demographics in these respective areas. It is important to note that the bank had numerous branch changes during the period, and the 10 offices in Adams, DeWitt, Logan, and Morgan Counties were the only ones open throughout most of the review period.

Heartland's branch network provides adequate accessibility throughout the assessment area, particularly for low- and moderate-income geographies and/or individuals. Throughout the review period, there were two low-income tracts, both located in Adams County. Additionally, there were six moderate income tracts, two in Adams County, one in Livingston County, and three in Morgan County. Heartland's Quincy office (Adams County) is located approximately two miles from the low- and moderate-income tracts in the area. Two of the bank's offices in Morgan County are located in moderate-income tracts and one of the other two is very close proximity.

Most of the bank's branches have ATMs, including four that accept deposits. The bank operates two off-site ATMs that are located in moderate-income tracts. Additionally, the bank continues to offer a variety of alternative delivery systems that increase the availability of its loan and deposit products. Most of these delivery systems utilize technology to provide customers with 24-hour access to bank accounts and product information. The bank offers an internet and mobile banking service to pay bills and transfer funds. These alternative delivery systems are available to the entire assessment area, including low- and moderate-income tracts.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly for low- and moderate-income

geographies and/or individuals. Heartland added eight offices as a result of the 2026 CNB acquisition. The Christian County office and two locations in Morgan County are located in moderate-income geographies. Additionally, the new offices in Greene and Pike Counties were designated as distressed and/or underserved during the review period. Heartland closed three offices during the review period, two in Logan County and one in DeWitt County. All of the closed offices were in middle-income tracts, including one that was designated as underserved. Details related to branch changes are included in the following table.

Branch Changes – IL Non-MSA				
County	**Current Offices**	**Offices Open Throughout Review Period**	**Offices Acquired (All in 2026)**	**Offices Closed**
Adams	1 (Middle)	1		
Christian	1 (Moderate)		1 CNB	
DeWitt	2 (1 Middle, 1 Upper)	3		1 closed/relocated
Ford	None – Ford County was added to the Champaign MSA in 2024	1		
Greene	1 (Middle)		1 CNB	
Logan	2 (Middle)	4		2 closed
Montgomery	2 (Middle)		2 CNB	
Morgan	4 (2 Moderate, 1 Middle, 1 Upper)	1	3 CNB	
Pike	1 (Middle)		1 CNB	
Total	**14**	**10**	**8**	**3**
Source: Bank Data				

All of the offices that were added have drive-up access and most have ATMs. There are eight standalone ATMs, and two of them are located in moderate-income geographies. The recent branch changes should help Heartland effectively serve the low- and moderate-income portions of the recently expanded assessment area.

Reasonableness of Business Hours and Services

Services and business hours do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income census tracts and/or individuals. Business hours are generally comparable to the market. Most branch locations are equipped with ATMs, and a majority of branches have drive-up facilities. While there are slight differences noted among the lobby hours, drive-up capabilities, and ATM access at a limited number of locations, none of them vary in a way that inconveniences any portions of the assessment area.

Community Development Services

Heartland provides an adequate level of community development services. As detailed in the following table, 72 community development services were provided in this assessment area during the review period. The services in this assessment area account for 6.7 percent of the institution's total qualified activities. Of these, 39 are related to technical expertise provided to customers

applying for housing grants. As affordable housing for low- and moderate-income individuals is an identified credit need in this area, this activity reflects responsiveness.

Community Development Services – IL Non-MSA					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
11/14/2023-12/31/2023	1	3	1	-	**5**
2024	25	8	3	-	**36**
2025	11	8	5	-	**24**
YTD 2026	2	3	2	-	**7**
Total	**39**	**22**	**11**	**-**	**72**
Source: Bank Data					

Bank staff have been involved in various community organizations throughout the review period at levels comparable to, but slightly higher than the previous review period. Staff from the acquired offices remain engaged in supporting organizations throughout the newly expanded assessment area. The services provided have involved serving on as Board members and providing classes related to financial literacy. Some notable examples include:

- An employee serves on the Board of Directors and provides professional and technical assistance to a local organization that promotes economic development in Morgan and Scott Counties.

- An employee serves on the Board of Directors and Finance Committee for an organization that brings various community-service driven organizations and resources together to help meet basic needs of vulnerable community members.

- Heartland utilized several down payment assistance programs in the assessment area including 12 FHLBC DPP grants totaling $113,000; seven Borrow Smart grants totaling $18,000; five Home Matters Grants totaling $3,000; and 15 IHDA grants totaling $108,000. For each grant awarded, a bank employee provides technical assistance through preparation of the grant application.

DECATUR MSA – Limited Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DECATUR MSA ASSESSMENT AREA

The Decatur assessment area includes all of Macon County, which comprises the entire Decatur MSA. Heartland operates one branch with an ATM in a low-income census tract. This area was not reviewed during the previous evaluation due to the limited amount of time since it was added as part of the Town and Country Bank acquisition that occurred February 1, 2023. As of June 30, 2025, this area accounted for 1.0 percent of deposits and 3.0 percent of reported loans generated from 2023 – 2025. These activity levels are the lowest of all assessment areas in the State of Illinois.

With respect to market share, Heartland is ranked 10th in deposit market share, accounting for 1.7 percent of area deposits according to FDIC Deposit Market Share data as of June 30, 2025. The deposit market consists of 13 financial institutions operating 34 offices within the assessment area. According to 2024 HMDA aggregate data, Heartland was ranked 14th out of 158 HMDA reporting lenders, with 2.5 percent of the market share. According to 2024 CRA aggregate data, the bank was 9th out of 52 lenders reporting small business loans, with 2.6 percent of the market share. CRA aggregate data included nine lenders reporting small farm loans, but Heartland did not report any originations. The table below includes demographic details for the assessment area.

Demographic Information of the Assessment Area – Decatur MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	37	13.5	24.3	48.7	10.8	2.7
Population by Geography	103,998	7.2	21.9	51.6	18.5	0.8
Housing Units by Geography	50,364	8.1	25.2	50.0	15.4	1.2
Owner-Occupied Units by Geography	30,265	4.3	15.6	58.7	21.1	0.3
Occupied Rental Units by Geography	13,545	13.3	41.5	35.4	6.8	2.9
Vacant Units by Geography	6,554	15.0	36.1	40.0	6.7	2.1
Businesses by Geography	7,555	15.1	19.3	43.7	21.4	0.7
Farms by Geography	271	3.7	3.7	66.8	25.5	0.4
Family Distribution by Income Level	26,176	21.2	17.2	21.4	40.2	0.0
Household Distribution by Income Level	43,810	24.5	16.2	17.8	41.5	0.0
Median Family Income MSA - 19500 Decatur, IL MSA		$71,270	Median Housing Value			$ 90,061
			Median Gross Rent			$694
			Families Below Poverty Level			11.3%
Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE DECATUR MSA ASSESSMENT AREA

For evaluation purposes, examiners compared the performance of the Decatur MSA Assessment Area to other metropolitan assessment areas within the State of Illinois that were reviewed using full-scope examination procedures. Lending, Investment, and Service Test conclusions from this assessment area did not alter the institution's overall performance rating for the State.

LENDING TEST

The bank's Lending Test performance in the Decatur MSA is consistent with the performance in the full-scope assessment areas. Examiners drew conclusions regarding the bank's lending performance from reviewing facts and data, including performance figures, aggregate lending data comparisons, and demographic information.

From 2023 – 2025, this area accounted for the second lowest share of lending at 3.0 percent, by dollar volume. Tables demonstrating the bank's geographic and borrower distribution performance for this lending are in the appendix. Heartland's community development lending performance in

the assessment area included four loans totaling $10.1 million, which was 1.3 percent of all qualified activities.

INVESTMENT TEST

Investment Test performance is consistent with the institution's full-scope assessment areas. During the review period, Heartland made five qualified investments totaling approximately $2.5 million and 22 donations totaling $28,000 in the Decatur MSA. The area had 0.8 percent of total qualified investments by dollar volume, ranking ninth among all areas.

SERVICE TEST

Service Test performance in the Decatur MSA is consistent with the full-scope assessment areas. The area had 5.7 percent of qualified service activity and is home to 1.2 percent of the bank's offices. Heartland recorded 61 qualified community development service activities in the assessment area during the evaluation period. Branch distribution and alternative delivery systems, products, services, and business hours are consistent with those offered within the full-scope assessment area.

PEORIA MSA – Limited Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PEORIA MSA ASSESSMENT AREA

Heartland has taken the entire Peoria MSA, which is comprised of Marshall, Peoria, Tazewell, and Woodford counties, as an assessment area. Heartland operates 14 branches and 15 ATMs in this assessment area. All of the branches are in middle- and upper-income geographies, and one ATM is in a low-income tract.

As of June 30, 2025, this area accounted for 14.4 percent of deposits and 8.5 percent of reported loans generated from 2023 – 2025. These activity levels are the 3rd and 4th highest, respectively, among all assessment areas in the State of Illinois. With respect to market share, Heartland is ranked 4th in deposit market share, accounting for 6.1 percent of area deposits according to FDIC Deposit Market Share data as of June 30, 2025. The deposit market consists of 34 financial institutions operating 111 offices within the assessment area. According to 2024 HMDA aggregate data, Heartland was ranked 28th out of 260 HMDA reporting lenders, with 0.6 percent of the market share. According to 2024 CRA aggregate data for small business loans, the bank was 10th out of 76 reporting lenders, with 2.2 percent of the market share. Heartland ranked 3rd out of 17 lenders reporting small farm loans with an 8.5 percent market share. The following table details select demographic and economic information for the assessment area.

Demographic Information of the Assessment Area - Peoria MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	93	9.7	18.3	52.7	19.4	0.0
Population by Geography	363,382	5.2	16.8	52.8	25.2	0.0
Housing Units by Geography	164,165	6.4	18.2	53.8	21.6	0.0
Owner-Occupied Units by Geography	104,864	2.4	16.1	56.8	24.7	0.0
Occupied Rental Units by Geography	42,226	13.2	21.3	48.4	17.2	0.0
Vacant Units by Geography	17,075	14.5	23.1	48.7	13.7	0.0
Businesses by Geography	28,229	9.1	14.0	50.3	26.6	0.0
Farms by Geography	1,199	1.3	7.0	65.3	26.4	0.0
Family Distribution by Income Level	92,683	19.4	18.5	21.6	40.5	0.0
Household Distribution by Income Level	147,090	23.8	15.9	18.6	41.7	0.0
Median Family Income MSA - 37900 Peoria, IL MSA		$78,239	Median Housing Value			$ 139,963
			Median Gross Rent			$798
			Families Below Poverty Level			7.9%

Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE PEORIA MSA ASSESSMENT AREA

For evaluation purposes, examiners compared the performance of the Peoria MSA Assessment Area to other metropolitan assessment areas within the State of Illinois that were reviewed using full-scope examination procedures. Lending, Investment, and Service Test conclusions from this assessment area did not alter the institution's overall performance rating for the State.

LENDING TEST

The bank's Lending Test performance in the Peoria MSA is consistent with the performance in the full-scope assessment areas. Examiners drew conclusions regarding the bank's lending performance from reviewing facts and data, including performance figures, aggregate lending data comparisons, and demographic information.

According to the bank's reported CRA and HMDA loan data from 2023 – 2025, this area accounted for the fourth highest share of lending at 8.5 percent, by dollar volume. Tables demonstrating the bank's geographic and borrower distribution performance for this lending are in the appendix. For small farm lending, the bank ranked first in lending in moderate-income tracts and second in lending to borrowers reporting revenues of $1 million or less. Heartland's community development lending performance in the assessment area included 18 loans totaling $51.9 million, which was 6.8 percent of all qualified activity.

INVESTMENT TEST

Investment Test performance is consistent with the institution's full-scope assessment areas. During the review period, Heartland made 21 qualified investments totaling approximately $13.2

million, maintained 6 qualified investments totaling $6.4 million from a prior period, and made 37 donations totaling $65,000 in the Peoria MSA, which was 6.5 percent of all qualified activity.

SERVICE TEST

Service Test performance in the Peoria MSA is consistent with the full-scope assessment areas. The area had 15.6 percent of qualified service activity and is home to 16.5 percent of the bank's offices. Heartland recorded 167 qualified community development service activities in the assessment area during the evaluation period. Branch distribution and alternative delivery systems, products, services, and business hours are consistent with those offered within the full-scope assessment areas.

SPRINGFIELD MSA – Limited Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD MSA ASSESSMENT AREA

The Springfield MSA assessment area is comprised of Sangamon County, which is one of two counties comprising the MSA. Heartland operates three branches with ATMS in middle- and upper-income areas. Some of these locations are in close proximity to the low- and moderate-income geographies, which are primarily located in and around the City of Springfield. This area was not reviewed during the previous evaluation due to the limited amount of time since it was added as part of the Town and Country Bank acquisition that occurred February 1, 2023.

As of June 30, 2025, this area accounted for 5.5 percent of deposits and 7.9 percent of reported loans generated from 2023 – 2025. These activity levels rank fifth lowest of all assessment areas in the State of Illinois for both deposits and loans. With respect to market share, Heartland is ranked 10th in deposit market share, accounting for 2.7 percent of area deposits according to FDIC Deposit Market Share data as of June 30, 2025. The deposit market consists of 24 financial institutions operating 75 offices within the assessment area. According to 2024 HMDA aggregate data, Heartland ranked 14th out of 210 HMDA reporting lenders, with 2.0 percent of the market share. According to 2024 CRA aggregate data, the bank was 14th out of 63 lenders reporting small business loans, with 1.4 percent of the market share. Heartland ranked seventh out of 16 lenders reporting small farm loans with a 4.5 percent market share. The following table details select demographic and economic information for the assessment area.

Demographic Information of the Assessment Area - Springfield MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	54	18.5	25.9	25.9	29.6	0.0
Population by Geography	196,343	13.1	20.8	28.9	37.2	0.0
Housing Units by Geography	91,952	14.6	23.4	30.1	31.9	0.0
Owner-Occupied Units by Geography	58,861	7.9	19.5	31.9	40.7	0.0
Occupied Rental Units by Geography	25,232	28.0	29.2	26.9	15.8	0.0
Vacant Units by Geography	7,859	21.8	34.4	26.3	17.5	0.0
Businesses by Geography	30,822	9.0	26.2	14.7	50.2	0.0
Farms by Geography	651	3.8	8.8	37.9	49.5	0.0

Demographic Information of the Assessment Area - Springfield MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Family Distribution by Income Level	50,068	23.8	15.8	20.8	39.6	0.0
Household Distribution by Income Level	84,093	25.1	15.9	17.0	42.0	0.0
Median Family Income MSA - 44100 Springfield, IL MSA		$83,948	Median Housing Value			$ 137,014
			Median Gross Rent			$823
			Families Below Poverty Level			9.7%
Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE SPRINGFIELD MSA ASSESSMENT AREA

For evaluation purposes, examiners compared the performance of the Springfield MSA Assessment Area to other metropolitan assessment areas within the State of Illinois that were reviewed using full-scope examination procedures. Lending, Investment, and Service Test conclusions from this assessment area did not alter the institution's overall performance rating for the State.

LENDING TEST

The bank's Lending Test performance in the Springfield MSA is better than the performance in the full-scope assessment areas. Examiners drew conclusions regarding the bank's lending performance from reviewing facts and data, including performance figures, aggregate lending data comparisons, and demographic information.

According to the bank's reported CRA and HMDA loan data from 2023 – 2025, this area accounted for 7.9 percent of lending, by dollar volume. Tables demonstrating the bank's geographic and borrower distribution performance for this lending are in the appendix. Heartland's community development lending performance in the assessment area included 18 loans totaling $56.2 million, which was 7.4 percent of all qualified activities.

INVESTMENT TEST

Investment Test performance is consistent with the institution's full-scope assessment areas. During the review period, Heartland made 12 qualified investments totaling approximately $9.9 million, maintained two qualified investments totaling $1.7 million from a prior period, and made 30 donations totaling $68,000 in the Springfield MSA. This assessment area accounted for 3.9 percent of total qualified investments by dollar volume, ranking sixth among all areas.

SERVICE TEST

Service Test performance in the Springfield MSA is better than in the full-scope assessment areas, given its capacity and presence in the market. Heartland recorded 142 qualified community development service activities in the assessment area during the evaluation period. The area had the third highest amount of qualified service activity (13.3 percent) and is home to 3.5 percent of the bank's offices. Branch distribution and alternative delivery systems, products, services, and business hours are consistent with those offered within the full-scope assessment areas.

IOWA

CRA RATING FOR IOWA: Satisfactory

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN IOWA

Heartland's operations in the State of Iowa consist of the following counties: Linn and Jones Counties (Cedar Rapids MSA), Johnson County (Iowa City MSA), and Black Hawk County (Waterloo MSA). As of June 30, 2025, Iowa only accounted for 2.5 percent of deposits. From 2023-2025, 4.2 percent of reported loans were originated in the Iowa assessment areas. Heartland operates four offices with ATMs and four standalone ATMs in Iowa. Performance in this state received limited weight in the current evaluation due to continued low activity levels. Detailed descriptions of the bank's assessment areas and operations in this state are noted in each applicable assessment area. Performance levels and lending volume are comparable to the previous review period throughout the assessment areas.

SCOPE OF EVALUATION – IOWA

Examiners evaluated the bank's CRA performance for the State of Iowa through full scope reviews of the Cedar Rapids MSA and Iowa City MSA and a limited scope review in the Waterloo MSA. Each assessment area was analyzed individually and given that no performance anomalies existed, the data for the Cedar Rapids MSA and Iowa City MSA is provided collectively for presentation purposes and referred to as the Cedar Rapids CSA. Community development lending, investments, and services were consistent with those described at the institution level. The Cedar Rapids CSA contains most of the bank's offices and lending activity, as such, performance in that area carried the most weight in arriving at overall conclusions for Iowa.

CONCLUSIONS ON PERFORMANCE CRITERIA IN IOWA

LENDING TEST

Heartland demonstrated adequate performance under the Lending Test in Iowa. Lending performance in the Cedar Rapids CSA mainly supports this conclusion. Performance was generally consistent between the assessment areas, but lending activity was too nominal in the Waterloo MSA to draw meaningful conclusions. Refer to the separate Iowa assessment area sections for details regarding the loan products reviewed and related conclusions.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. Small business and small farm lending support this conclusion. Home mortgage lending was too nominal to be

assessed and carried very little weight. According to the bank's reported CRA and HMDA loan data from 2023 – 2025, 4.2 percent of all lending and 2.4 percent of community development lending was conducted in the Iowa rated area. Detailed information is discussed at the assessment area level.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the Cedar Rapids CSA based on small business lending performance. Small farm lending was poor and home mortgage lending was too nominal to draw meaningful conclusions; therefore, these product lines carried limited weight in ratings. Volume was too limited in the Waterloo MSA to draw meaningful conclusions.

Borrower Profile

The distribution of loans reflects good penetration among small business and small farm customers of different sizes throughout the Cedar Rapids CSA. Volume was too limited in the Waterloo MSA to be assessed.

Innovative or Flexible Lending Practices

The institution makes little use of innovative or flexible lending practices to serve the assessment area's needs. Performance was consistent between the assessment areas.

Community Development Loans

Heartland made an adequate level of community development loans in the Iowa assessment areas. Performance was consistent in the assessment areas. Heartland made 10 loans totaling $18.4 million in the Iowa assessment areas. By dollar volume, the community development loan activity was most prominent in the Waterloo MSA. In addition, Heartland made two qualified loans totaling $7.2 million that benefited portions of Iowa that were outside the assessment area. This overall volume accounts for 2.4 percent of total community development lending and is an increase from the $13.7 million in lending during the previous review period. Refer to each assessment area for more information.

- The bank extended a $1.9 million construction loan for a 56-unit affordable housing project in Davenport, IA. A majority of the units were funded utilizing LIHTC and have income restrictions for residents living at 60 percent or lower of the area median income. The loan supports affordable housing in the broader statewide area.

- Heartland extended a $5.3 million loan for the construction of a casino and hotel in Iowa. The project is located in a federally designated Opportunity Zone, which is an area identified as being economically distressed and targeted for redevelopment. The facility is located in a moderate-income tract that is bordered by low- and moderate-income areas. The project resulted in the creation of permanent low- and moderate-income jobs and helped support economic development in the broader statewide area.

INVESTMENT TEST

Heartland demonstrated an adequate level of investment and grant activity under the Investment Test in the State of Iowa. This conclusion is supported by consistent activity in both assessment areas.

Investment and Grant Activity

The institution has an adequate level of qualified community development investments and grants, although rarely in a leadership position. Heartland made or held 49 qualified investments and donations totaling $4.3 million in the Iowa assessment areas. The investment and grant activity was most prominent in the Cedar Rapids CSA. This volume accounts for 1.4 percent of total qualified activities and is an increase from the $1.4 million in investment and grant activity during the previous review period. Refer to each assessment area for additional information.

Responsiveness to Credit and Community Development Needs

The institution exhibits adequate responsiveness to the credit and community economic development needs. Investments and donations were made primarily to support affordable housing for low- and moderate-income individuals.

Community Development Initiatives

The bank rarely uses innovative or complex investments to support community development initiatives. The investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

Heartland demonstrated adequate performance under the Service Test in the State of Iowa. Adequate performance in the Cedar Rapids CSA primarily supports this conclusion and consistent performance in the Waterloo MSA provides additional support. Refer to each assessment area for additional information.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's Iowa assessment areas. Heartland operates four offices with ATMs and four standalone ATMs in Iowa. Heartland does not operate any branches in low-income census tracts, but there are two standalone ATMs. Heartland operates one branch with an ATM in a moderate-income census tract. Additionally, the bank continues to offer alternative delivery systems such as mobile banking, and online banking.

Changes in Branch Locations

The bank has not opened or closed any branches in this assessment area since the prior evaluation.

Reasonableness of Business Hours and Services

The bank's services and business hours do not vary in a way that inconveniences portions of the Iowa assessment areas, particularly low- and moderate-income geographies and/or individuals. Business hours and services for the rated area are consistent with those discussed at the overall institution level.

Community Development Services

Heartland provides an adequate level of community development services. This conclusion is based on available opportunities and considers the bank's presence in the assessment areas. Bank employees provided 67 instances of financial expertise or technical assistance to affordable housing and community service-related organizations in the Iowa assessment areas during the evaluation period. This level of services represents 6.3 percent of total community development services performed during the review period and reflects an increase since the previous evaluation.

CEDAR RAPIDS CSA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CEDAR RAPIDS CSA ASSESSMENT AREA

Heartland has designated two assessment areas with counties that are both designated as part of the Cedar Rapids CSA. Specifically, Linn and Jones counties are in the Cedar Rapids MSA and Johnson County is part of the Iowa City MSA. The bank's performance was consistent throughout the three-county area, so it is being presented collectively. The bank continues to operate three branches in this area, which is 3.5 percent of the bank's locations overall. Limited volume is conducted in this area, which accounted for 3.7 percent of the reported CRA and HMDA loans from 2023 – 2025 and 1.9 percent of total deposits as of June 30, 2025. Additionally, the bank conducted a limited portion of community development lending, investments, and service activities within this assessment area; therefore, it carries limited weight in the overall CRA rating.

Economic and Demographic Data

This assessment area encompasses all 97 census tracts that comprise Linn, Jones, and Johnson counties. These census tracts reflect the following income designations according to the 2020 Census:

- 4 low-income census tracts,
- 27 moderate-income census tracts,
- 44 middle-income census tracts,
- 21 upper-income census tracts, and
- 1 census tract with no income category.

Demographic Information of the Assessment Area - Cedar Rapids CSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	97	4.1	27.8	45.4	21.7	1.0
Population by Geography	403,799	3.8	23.2	45.7	26.7	0.7
Housing Units by Geography	171,913	3.4	24.9	46.8	24.0	0.8
Owner-Occupied Units by Geography	109,688	0.6	18.9	50.0	30.4	0.2
Occupied Rental Units by Geography	50,232	8.6	37.6	40.0	11.7	2.2
Vacant Units by Geography	11,993	7.2	27.2	46.4	18.1	1.1
Businesses by Geography	46,843	7.0	24.7	41.0	26.7	0.6
Farms by Geography	1,687	6.2	11.0	50.9	31.8	0.1
Family Distribution by Income Level	95,018	19.5	18.4	22.6	39.6	0.0
Household Distribution by Income Level	159,920	23.8	16.6	17.7	41.9	0.0
Median Family Income MSA - 16300 Cedar Rapids, IA MSA Median Family Income MSA - 26980 Iowa City, IA MSA		$85,854 $93,237	Median Housing Value			$ 194,751
			Median Gross Rent			$875
			Families Below Poverty Level			6.4%
Sources: 2020 Census and 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The bank's performance under the geographic distribution criterion was compared to the respective area demographics and aggregate lending data for each product line. These characteristics provide some insight into the credit needs and demand in low- and moderate-income geographies, which are considered when evaluating geographic lending patterns. Performance under the borrower profile criterion also compares the respective area demographics and aggregate lending data for each product line. The 2024 and 2025 FFIEC-updated median family income levels are used to analyze home mortgage loans under this criterion and are included in the following table.

Estimated Median Family Income Ranges - Cedar Rapids CSA					
Year	**MFI**	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Cedar Rapids, IA					
2024	$ 101,700	< $50,850	$50,850 to < $81,360	$81,360 to < $122,040	>= $122,040
2025	$ 103,000	< $51,500	$51,500 to < $82,400	$82,400 to < $123,600	>= $123,600
Iowa City, IA					
2024	$ 109,900	< $54,950	$54,950 to < $87,920	$87,920 to < $131,880	>= $131,880
2025	$ 113,100	< $56,550	$56,550 to < $90,480	$90,480 to < $135,720	>= $135,720
Source: FFIEC					

According to 2025 D&B data, the assessment area contains 46,843 non-farm businesses with the following revenue characteristics: 90.1 percent have $1 million or less, 1.9 percent have more than $1 million, and 8.0 percent have unknown revenues. Farming operations are also present in the more rural portions of the assessment area. The assessment area contains 1,687 farming operations, and 98.8 percent reported revenues of $1 million or less. Service industries represent the largest portion of businesses in the assessment area at 10.7 percent; followed by professional, scientific, and technical services (9.4 percent), and construction (7.8 percent). In addition, 70.5 percent of assessment area businesses have four or fewer employees, and 92.3 percent operate from a single location.

According to Moody's, the top employers in the MSA are in education (University of Iowa), healthcare (University of Iowa Hospital and Clinics, Veterans Administration Medical Center, Unity Point – St. Luke's), and aerospace and defense (Collins Aerospace) As detailed in the following table, unemployment levels were comparable to state and national levels during the review period. The following table illustrates the relevant unemployment rates by county, state, and nationally.

Unemployment Rates - Cedar Rapids CSA			
	2024 Annual Average	**2025 Annual Average**	**April 2026**
County	**%**	**%**	**%**
Johnson	2.4	2.7	2.4
Jones	3.7	4.2	2.8
Linn	3.4	3.8	3.0
State of Iowa	3.2	3.5	2.5
National Average	4.0	4.3	4.0
Source: U.S. Bureau of Labor Statistics			

Competition

The assessment area has a competitive market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, there were 35 financial institutions operating 119 offices within the three-county area. Heartland ranked 23rd, maintaining a 0.7 percent deposit market share. Lending competition is present from banks, credit unions, and non-depository mortgage lenders in the area. The 2024 HMDA aggregate lending data reflects 262 reporting lenders with Heartland ranked 129th with a 0.02 percent market share. According to 2024 aggregate CRA data, Heartland ranked 16th for small business loans with a 0.7 percent market share among 88 reporting lenders and sixth for small farm loans with a 2.2 percent market share among 23 reporting lenders.

Community Contacts

Examiners reviewed two recently conducted contacts to assist in identifying credit needs and opportunities in the Cedar Rapids CSA. The contacts were primarily focused on economic development but also included local economic conditions, housing trends, and local credit needs.

The contact stated that current economic conditions are good; however, change is anticipated. Many area business and manufacturing entities are dependent on agriculture. Whether producing, processing, storing, or transporting, the operating costs in agricultural and commercial sectors are rising and squeezing profit margins. The contact indicated that large businesses would fare better as the economy contracts. Smaller businesses must compete with the larger operations, as well as online retailers given that many consumers now prefer to shop from home. The agricultural sector is noting a rise in input costs and diminishing commodity prices resulting in lower profits and operational difficulties for small farms. There are many programs available for beginning farmers, but start-up costs are prohibitive. Area farms and businesses are struggling due to a lack of experienced, qualified workers, with the greatest impact noted in manufacturing.

Regarding housing, prices continue to rise, making starter homes unaffordable for families looking for their first home. The stock of available affordable housing is dwindling. The high cost of housing is forcing low- and moderate-income individuals to rent a dwelling and forgo purchasing a home. Contractors interested in building affordable housing units have found that input costs are similar to higher-end homes that result in greater margins. These factors place additional pressure on available housing units. Housing costs are slightly more affordable in rural areas where older homes are available. Finally, the community contact stated that the environment for involvement by financial institutions is very competitive.

Credit and Community Development Needs and Opportunities

Considering information from community contact, bank management, and demographic and economic data, examiners determined that home mortgage, especially relating to low- and moderate-income families, small business, and small farm loans are important needs in the area. In particular, the percentage of low- and moderate-income families at 37.9 percent, 90.1 percent of businesses and 98.8 percent of farms with GARs of $1 million or less in the assessment area help support this conclusion. The community contact additionally identified the need for affordable housing, small business, and small farm loans.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CEDAR RAPIDS CSA ASSESSMENT AREA

LENDING TEST

Heartland demonstrated adequate performance under the Lending Test in the Cedar Rapids CSA.

Lending Activity

Heartland's lending performance reflects adequate responsiveness to area credit needs. This conclusion is mainly supported by performance under the borrower profile criterion and community development lending during this review period. According to the bank's reported CRA and HMDA loan data from 2023 – 2025, this area accounted for 3.7 percent of total dollar volume. As noted previously, in 2024 the bank ranked 16th in market share for small business loans, 129th for home mortgage loans, and sixth for small farm loans in this assessment area, all based on number of loans. Also, 1.1 percent of all community development lending occurred in this assessment area, the lowest of all areas. Bank management explained that there is still not a dedicated home mortgage lender in the assessment area, which contributed to very low loan volume. As a result, performance was not evaluated for that product line as there were not enough loan originations to draw meaningful conclusions.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the assessment area, particularly in low- and moderate-income geographies. This conclusion is primarily supported by the bank's small business lending performance. No small farm loans were made in low- or

moderate-geographies during the review period, which reflects poor performance, but it did not impact ratings, especially when considering applicable performance context.

Small Business Lending

The geographic distribution of small business loans reflects poor penetration throughout the assessment area, including low- and moderate-income census tracts. The level of lending in low-income tracts is comparable to aggregate lending levels and area demographics and is considered adequate. Lending in moderate-income geographies was significantly lower than aggregate lending levels. The overall loan volume during this review period was comparable to the previous review period and the level of lending in moderate-income geographies has improved; however, the current levels trail aggregate lending levels by almost 50 percent in both years. There is significant competition in the assessment area and the top five lenders

Geographic Distribution of Small Business Loans - Cedar Rapids CSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	7.2	5.0	3	6.7	525	5.8
2025	7.0	--	3	9.4	525	7.0
Moderate						
2024	24.8	22.7	5	11.1	1,573	17.4
2025	24.7	--	4	12.5	1,399	18.8
Middle						
2024	40.9	38.4	17	37.8	3,103	34.3
2025	41.0	--	11	34.4	1,643	22.0
Upper						
2024	26.6	32.5	18	40.0	3,695	40.8
2025	26.7	--	12	37.5	3,603	48.3
NA						
2024	0.6	1.4	2	4.4	160	1.8
2025	0.6	--	2	6.3	285	3.8
Total						
2024	**100.0**	**100.0**	**45**	**100.0**	**9,056**	**100.0**
2025	**100.0**	**--**	**32**	**100.0**	**7,455**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Home Mortgage Lending

Due to the low volume of home mortgage lending in this assessment area, no meaningful conclusions can be drawn regarding the bank's lending performance. There were three loans originated in the assessment area in 2024, and 12 loans originated in 2025. It is noted that two of those loans were in moderate-income census tracts. Management indicated that the bank still does not have a dedicated home mortgage lender located in any of the three offices in the CSA, which may impact the potential to originate home mortgage loans.

Small Farm Lending

The geographic distribution of small farm loans reflects poor penetration throughout the assessment area, which is supported by the lack of lending, particularly in moderate-income geographies. As detailed in the following table, very few farms in the assessment area are located in low-income geographies and there is very limited lending occurring. Aggregate lending reports indicated a total

of four loans were made in the low-income geographies in 2024. The loans were all in the Iowa City MSA portion of the area, were all made by the same lender, and had an average loan amount of $4,000.

Farms are more prevalent in the moderate-income tracts. Aggregate lending data reveals that approximately one third of the volume from all reporting lenders occurred in moderate-income tracts, primarily in the Iowa City MSA. In moderate-income tracts, there were only eight loans in the Cedar Rapids MSA, and the remaining 266 loans were in the Iowa City MSA. There is a high level of competition in the Iowa City MSA, which is demonstrated by considering that the 266 loans made in moderate-income tracts were made by 11 lenders. The top lender held an 86.8 percent market share by number and 94.5 percent by dollar volume. The top five lenders collectively held a 97.0 market share by number and 98.0 percent by dollar volume. Heartland's only location in the Iowa City MSA portion of the assessment area is in the city of Coralville, which is in the vicinity of the University of Iowa campus, and is several miles from the farming operations in the county. These factors contribute somewhat to the bank's poor performance under this criterion; however, it did not impact the bank's overall CRA rating as less weight was placed on lending activity in this assessment area and this product line.

Geographic Distribution of Small Farm Loans - Cedar Rapids CSA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	5.6	0.5	0	0.0	0	0.0
2025	6.2	--	0	0.0	0	0.0
Moderate						
2024	10.1	34.0	0	0.0	0	0.0
2025	11.0	--	0	0.0	0	0.0
Middle						
2024	52.1	52.3	18	100.0	2,596	100.0
2025	50.9	--	29	100.0	3,897	100.0
Upper						
2024	32.1	13.2	0	0.0	0	0.0
2025	31.8	--	0	0.0	0	0.0
NA						
2024	0.1	--	0	0.0	0	0.0
2025	0.1	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**18**	**100.0**	**2,596**	**100.0**
2025	**100.0**	**--**	**29**	**100.0**	**3,897**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Borrower Profile

The distribution of borrowers reflects adequate penetration among businesses and farms of different sizes in the assessment area. Heartland's small farm lending performance primarily supports this conclusion and small business lending provides additional support. Home mortgage lending was not considered in this criteria as meaningful conclusions are difficult to draw when, so few loans were originated in this assessment area.

Small Business Lending

The distribution of small business loans reflects good penetration among businesses of different sizes. As detailed in the following table, Heartland's level of lending to businesses with gross annual revenues of $1 million or less exceeded aggregate lending levels in 2024 and increased in 2025.

Distribution of Small Business Loans by Gross Annual Revenue Category - Cedar Rapids CSA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	90.5	53.2	29	64.4	4,834	53.4
2025	90.1	--	25	78.1	4,715	63.3
> $1,000,000						
2024	2.0	--	11	24.4	2,007	22.2
2025	1.9	--	6	18.8	1,780	23.9
Revenue Not Available						
2024	7.4	--	5	11.1	2,215	24.5
2025	8.0	--	1	3.1	960	12.9
Total						
2024	**100.0**	**100.0**	**45**	**100.0**	**9,056**	**100.0**
2025	**100.0**	**--**	**32**	**100.0**	**7,455**	**100.0**

Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Home Mortgage Lending

Due to the nominal volume of home mortgage lending in the assessment area, no meaningful conclusions can be drawn regarding the bank's lending performance. It is noted that there were four loans made to low-income borrowers in 2025 and one loan was made to a moderate-income borrower in 2024.

Small Farm Lending

The distribution of small farm loans to borrowers reflects good penetration among farms of different sizes. As reflected in the following table, Heartland's lending to farming operations with gross annual revenues at $1 million or less exceeded aggregate lending levels in 2024 and improved in 2025. Almost all of the bank's lending activity occurred in the Cedar Rapids MSA where there is a high level of competition. Of the 14 reporting lenders in that MSA, Heartland ranked 4th with a 7.0 percent market share, while the top lender held 59.5 percent market share.

Distribution of Small Farm Loans by Gross Annual Revenue Category - Cedar Rapids CSA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	98.9	61.0	13	72.2	1,504	57.9
2025	98.8	--	23	79.3	3,040	78.0
> $1,000,000						
2024	0.2	--	4	22.2	750	28.9
2025	0.2	--	4	13.8	782	20.1
Revenue Not Available						
2024	0.9	--	1	5.6	342	13.2
2025	1.0	--	2	6.9	75	1.9
Total						
2024	**100.0**	**100.0**	**18**	**100.0**	**2,596**	**100.0**
2025	**100.0**	**--**	**29**	**100.0**	**3,897**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Innovative or Flexible Lending Practices

Heartland makes little use of innovative or flexible lending practices to serve assessment area credit needs. During the evaluation period, the bank originated three affordable small dollar loans totaling $2,000, which helps meet the credit needs of low- and moderate-income borrowers. This is an increase from the prior evaluation when the bank originated two loans totaling $1,000 in the assessment area.

Community Development Loans

Heartland made an adequate level of community development loans in this assessment area. As reflected in the following table, the bank made seven community development loans totaling $8.1 million in this assessment area during the evaluation period. This represents 1.1 percent of the bank's total qualified lending, by dollar volume. This level of lending is a slight decrease by number and increase by dollar volume since the previous evaluation when the bank made five loans totaling $11.2 million.

Community Development Lending – Cedar Rapids CSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	**-**	**-**
2024	-	-	-	-	3	4,735	-	-	**3**	**4,735**
2025	1	462	-	-	1	750	-	-	**2**	**1,212**
YTD 2026	-	-	-	-	2	2,200	-	-	**2**	**2,200**
Total	**1**	**462**	-	-	6	7,685	-	-	**7**	**8,147**
Source: Bank Data										

Notable examples of the bank's community development loans originated in the assessment area include:

- A $2.4 million loan was extended to finance a grocery store in a low-income census tract. The store is located in a TIF district that was established to promote reinvestment in the downtown area. The store will provide permanent low- and moderate-income employment opportunities and promote economic development in the area.

- A loan for more than $460,000 was originated to acquire three multi-family apartment complexes located in a moderate-income geography. All 16 units are leased for rates that are below the fair market rent for the area, which supports affordable housing.

INVESTMENT TEST

Heartland demonstrated adequate performance under the Investment Test in the Cedar Rapids CSA assessment area. The bank's adequate level of qualified investments and responsiveness to community development needs supports this conclusion. This assessment area accounted for 0.9 percent of total qualified investments by dollar volume, ranking eighth among all areas.

Investment and Grant Activity

Heartland has an adequate level of qualified community investments and grants in this assessment area. As detailed in the following table, there were 32 qualified investments, grants, and donations totaling $2.9 million. This level of activity represents 0.9 percent of the bank's total community development investment activity, by dollar amount. The investment and donation activity during this review period reflects an increase since the previous evaluation period when the bank made or held 22 qualified investments, grants, and donations totaling approximately $826,000. A majority of the bank's investments remain in mortgage-backed securities that promote affordable housing throughout the assessment area.

Qualified Investments – Cedar Rapids CSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	2	233	-	-	-	-	-	-	**2**	**233**
11/14/2023 - 12/31/2023	-	-	-	-	-	-	-	-	**-**	**-**
2024	-	-	-	-	2	474	-	-	**2**	**474**
2025	2	1,812	-	-	1	314	-	-	**3**	**2,126**
YTD 2026	-	-	-	-	0	0	-	-	**0**	**0**
Subtotal	**4**	**2,045**	-	-	**3**	**788**	**-**	**-**	**7**	**2,833**
Qualified Grants & Donations	5	7	18	19	2	1	-	-	**25**	**27**
Total	**9**	**2,052**	**18**	**19**	**5**	**789**	**-**	**-**	**32**	**2,860**
Source: Bank Data										

Notable examples of qualified investments made or maintained by the bank during the current review period include:

- The bank purchased targeted mortgage-backed securities totaling $1.8 million. The bonds are collateralized by mortgages from low- and moderate-income borrowers, which helps support affordable housing throughout the assessment area.

- Heartland donated $4,000 to housing funds in Linn and Johnson Counties. These donations helped support the organizations in their missions to support affordable housing by providing funding for affordable home ownership, rental and transitional housing, and emergency shelter needs.

Responsiveness to Credit and Community Development Needs

Heartland exhibits adequate responsiveness to credit and community economic development needs in the assessment area. Investments and grants made were consistent with the needs of the assessment area. A majority of the qualified investments and grants, by number and dollar volume, have supported community services, economic development, and affordable housing, which are needs identified during the current evaluation period.

Community Development Initiatives

The bank rarely uses innovative or complex investments to support community development initiatives. The investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

The service performance reflects adequate responsiveness to the credit and community development needs in the Cedar Rapids CSA. The area had the lowest level of qualified service activity at 2.2 percent and is home to 3.5 percent of the bank's offices.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of this assessment area. As reflected in the following table, Heartland operates three offices and six ATMs in the Cedar Rapids CSA. The branch dispersion is relatively consistent with the population in the respective income segments. In Johnson County, the bank operates two ATMs in low-income census tracts and a branch with an ATM in a moderate-income geography. There is a low-income tract and several moderate-income tracts in Linn County, and there is an additional moderate-income tract in Jones County. Although the bank does not operate offices within the low- or moderate-income geographies in these counties, the Marion office in Linn County is located within close proximity and there are also branches of other financial institutions located nearby, which helps ensure that the banking and credit needs of area residents are met.

Branch and ATM Distribution by Geography Income Level - Cedar Rapids CSA								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	4	4.1	15,272	3.8	-	-	2	33.3
Moderate	27	27.8	93,494	23.2	1	33.3	1	16.7
Middle	44	45.4	184,590	45.7	2	66.7	3	50.0
Upper	21	21.7	107,782	26.7	-	-	-	-
NA	1	1.0	2,661	0.7	-	-	-	-
Total	**97**	**100.0**	**403,799**	**100.0**	**3**	**100.0**	**6**	**100.0**
Sources: 2020 Census Data and Institution Records								

The bank also continues to offer a variety of alternative delivery systems that increase the availability of its loan and deposit products. Most of these delivery systems utilize technology to provide customers with 24-hour access to bank accounts and product information. The bank offers an internet and mobile banking service to pay bills and transfer funds.

Changes in Branch Locations

The bank has not opened or closed any branches in this assessment area since the prior evaluation.

Reasonableness of Business Hours and Service

Services and business hours do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income census tracts and/or individuals. Business hours are generally comparable to the market. All bank products and services are offered in this assessment area; however, residential real estate lending is not a focus. Although the bank does not have a dedicated mortgage lender, bank staff in other markets are available to assist customers with this product line.

Community Development Services

Heartland provides an adequate level of community development services in this assessment area. As detailed in the following table, 24 community development services were provided in this assessment area, which accounts for 2.2 percent of the institution's total qualified activities. This level of activity is comparable to the previous review period.

Community Development Services – Cedar Rapids CSA					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
11/14/23-12/31/23	1	1	-	-	**2**
2024	2	1	-	-	**3**
2025	2	10	-	-	**12**
YTD 2026	1	6	-	-	**7**
Total	**6**	**18**	**-**	**-**	**24**
Source: Bank Data					

Bank staff have been involved in various community organizations that focus on addressing community needs such as food insecurity and affordable housing. These services have involved

serving as Board members and providing classes related to financial literacy. Some notable examples include:

- A bank employee provides technical and financial expertise while serving on the Board of a local community organization that focuses on providing affordable housing to low- and moderate-income senior citizens.

- An employee serves on the Finance Committee providing financial expertise to a local organization that helps with food insecurity in the assessment area. Additionally, bank staff members have provided financial education courses to area residents utilizing the services of the organization.

WATERLOO MSA – Limited-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WATERLOO MSA ASSESSMENT AREA

The Waterloo MSA assessment area includes all of Black Hawk County, which is a portion of the Waterloo-Cedar Falls, IA MSA that also includes Bremer and Grundy counties. Heartland operates one branch with an ATM and a standalone ATM in this assessment area, all of which are located in middle-income geographies. As of June 30, 2025, 0.7 percent of deposits were from this assessment area. There was very limited loan volume during the review period. Specifically, 0.5 percent of Heartland's reported loans from 2023-2025 originated in Black Hawk County.

With respect to market share, Heartland is ranked 13th in deposit market share, accounting for 1.0 percent of area deposits according to FDIC Deposit Market Share data as of June 30, 2025. The deposit market consists of 13 financial institutions operating 32 offices within the assessment area. According to 2024 HMDA aggregate data, Heartland was ranked 127th out of 136 HMDA reporting lenders, with 0.03 percent of the market share. According to 2024 CRA aggregate data, the bank was 18th out of 64 lenders reporting small business loans, with 0.7 percent of the market share. Heartland ranked sixth out of 15 lenders reporting small farm loans with a 5.2 percent market share. The table below includes demographic details for the assessment area.

Demographic Information of the Assessment Area - Waterloo MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	39	12.8	20.5	51.3	15.4	0.0
Population by Geography	131,144	7.8	15.8	55.0	21.3	0.0
Housing Units by Geography	58,187	9.2	17.0	54.1	19.7	0.0
Owner-Occupied Units by Geography	34,990	5.1	13.7	58.5	22.7	0.0
Occupied Rental Units by Geography	18,331	15.8	20.9	47.4	15.9	0.0
Vacant Units by Geography	4,866	14.2	26.3	47.7	11.8	0.0
Businesses by Geography	19,963	6.8	35.5	42.8	15.0	0.0
Farms by Geography	647	1.1	15.0	56.9	27.1	0.0
Family Distribution by Income Level	31,329	23.4	18.0	20.6	38.1	0.0
Household Distribution by Income Level	53,321	25.3	17.2	19.1	38.5	0.0

Demographic Information of the Assessment Area - Waterloo MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Median Family Income MSA - 47940 Waterloo-Cedar Falls, IA MSA		$76,924	Median Housing Value			$ 152,667
			Median Gross Rent			$830
			Families Below Poverty Level			9.9%

Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WATERLOO MSA ASSESSMENT AREA

For evaluation purposes, examiners compared the performance of the Waterloo MSA Assessment Area to other metropolitan assessment area within the State of Iowa that was reviewed using full-scope examination procedures. Lending, Investment, and Service Test conclusions from this assessment area did not alter the institution's overall performance rating for the State.

LENDING TEST

The bank's Lending Test performance in the Waterloo MSA is below the performance in the full-scope assessment area. According to the bank's reported CRA and HMDA loan data from 2023 – 2025, this area accounted for the lowest share of lending at 0.5 percent, by dollar volume. Lending volume was too low for examiners to draw meaningful conclusions about the bank's performance, but the tables reflecting loan activity are included in the appendix. Heartland's community development lending performance in the assessment area included three loans totaling $10.2 million, which was 1.3 percent of all qualified activities.

INVESTMENT TEST

Investment Test performance is consistent with the institution's full-scope assessment area. During the review period, Heartland made one qualified investment totaling approximately $1.0 million, maintained two investments totaling $393,000 that remain outstanding from a prior review period, and made 14 donations totaling $22,000 in the Waterloo MSA, which is 0.5 percent of all qualified activities.

SERVICE TEST

Service Test performance in the Waterloo MSA is consistent with the full-scope assessment area. Heartland recorded 43 qualified community development service activities in the assessment area during the evaluation period, which is four percent of all qualified service activity. There is one office in this assessment area and alternative delivery systems, products, services, and business hours are consistent with those offered within the full-scope assessment area.

ST. LOUIS, MO-IL MSA

CRA RATING FOR ST. LOUIS, MO-IL MSA: Satisfactory

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ST. LOUIS, MO-IL MSA

The St. Louis MSA assessment area is comprised of the following Missouri counties: St. Louis and the City of St. Louis. It also includes five contiguous counties in Illinois: Calhoun, Jersey, Macoupin, Madison, and St. Clair. This multi-state assessment area consists of whole geographies, does not arbitrarily exclude low- and moderate-income areas, and includes all the geographies where the bank's offices and deposit-taking ATMs are located.

Currently, Heartland bank operates nine branches (10.6 percent) in the seven-county area. This assessment area has expanded since the previous evaluation when it was comprised of Madison and St. Clair counties. Performance was not evaluated at the previous evaluation because this area had been recently added following the acquisition of Town & Country Bank. That acquisition involved two offices in Edwardsville (Madison County) and Fairview Heights (St. Clair County). The current delineation became effective in March 2026 when Heartland acquired CNB. As a result, the ratings in this area will primarily be derived from the activities that occurred throughout the review period in Madison and St. Clair counties.

Operations in this assessment area were limited throughout the review period. Limited volumes of reported loans (4.2 percent), deposits (2.4 percent), and community development lending, investment and service activities were conducted in this assessment area; therefore, it received limited weight in the overall CRA rating.

Economic and Demographic Data

This assessment area encompasses 492 census tracts including 72 low-income, 120 moderate-income, 156 middle-income, and 138 upper-income census tracts according to the 2020 Census. There are also six tracts with no income designation. The following table details select economic and demographic characteristics of the assessment area.

Demographic Information of the Assessment Area - St. Louis MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	492	14.6	24.4	31.7	28.1	1.2
Population by Geography	1,899,878	9.3	21.6	34.9	33.7	0.5
Housing Units by Geography	893,651	12.0	23.5	34.3	29.5	0.8
Owner-Occupied Units by Geography	512,550	6.3	19.8	36.0	37.5	0.4
Occupied Rental Units by Geography	282,130	18.2	27.2	33.7	19.7	1.2
Vacant Units by Geography	98,971	24.0	32.5	26.6	15.4	1.6
Businesses by Geography	338,339	8.9	16.8	30.4	43.0	1.0
Farms by Geography	3,830	2.5	10.4	35.4	51.2	0.6
Family Distribution by Income Level	479,781	22.9	17.8	19.8	39.5	0.0
Household Distribution by Income Level	794,680	26.4	16.6	17.7	39.4	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		$84,758	Median Housing Value			$ 182,003
			Median Gross Rent			$925
			Families Below Poverty Level			8.5%
Sources: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

As previously mentioned, the bank's performance under the geographic distribution criterion was compared to the respective area demographics and aggregate lending data for each product line. These characteristics provide some insight into the credit needs and demand in low- and moderate-income geographies, which are considered when evaluating geographic lending patterns. Please see the previous table for additional details.

Performance under the borrower profile criterion also compares the respective area demographics and aggregate lending data for each product line. The 2024 and 2025 FFIEC-updated median family income levels are used to analyze home mortgage loans under this criterion. The following table illustrates how those figures translate into low-, moderate-, middle-, and upper-income bands for the purpose of determining the bank's lending to borrowers of different income levels. The bank's performance under this criterion is compared to the percentage of families by income level and to HMDA aggregate lending levels.

Estimated Median Family Income Ranges - St. Louis MSA					
Year	**MFI**	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
St. Louis, MO-IL					
2024	$ 103,200	< $51,600	$51,600 to < $82,560	$82,560 to < $123,840	>= $123,840
2025	$ 111,200	< $55,600	$55,600 to < $88,960	$88,960 to < $133,440	>= $133,440
Source: FFIEC					

According to 2025 D&B data, the current (recently expanded) assessment area contains 338,339 non-farm businesses with the following revenue characteristics: 91.3 percent have $1 million or less, 2.2 percent have more than $1 million, and 6.6 percent have unknown revenues. Farming operations are also present in the more rural portions of the assessment area. The assessment area contains 3,830 farming operations, and 98.8 percent reported revenues of $1 million or less.

Before the assessment area was expanded, there were 38,629 non-farm businesses and 820 farms in the two-county area of Madison and St. Clair based on 2025 D&B data. These operations had similar reported revenue levels with 86.1 percent of non-farm businesses and 98.2 percent of farms reporting revenues of $1 million or less. The level of lending opportunities were much lower during the review period, which was taken into consideration during the analysis.

Professional, scientific, technical, and other services represent the largest portion of businesses in the assessment area at 19.9 percent; followed by real estate rental and leasing (7.8 percent), retail trade (7.6 percent), and health care and social assistance (7.2 percent). In addition, 70.1 percent of assessment area businesses have four or fewer employees, and 94.3 percent operate from a single location.

According to Moody's, public employment within the Federal, State, and Local governments is common throughout the area. The top private employers in the MSA are in healthcare (BJC Healthcare, SSM Health Care, Mercy Health Care) and the retail and manufacturing sector (Walmart, Boeing Defense, Schnucks). The economy is also highly dependent upon small businesses and agriculture-related businesses are more prevalent in the rural portions of the assessment area. As detailed in the following table, unemployment levels in the St. Louis MSA were comparable to state and national levels during the review period. The following table illustrates the relevant unemployment rates by county, state, and nationally.

Unemployment Rates – St. Louis MSA			
	2024 Annual Average	**2025 Annual Average**	**April 2026**
County	**%**	**%**	**%**
Calhoun, IL	4.6	4.7	4.3
Jersey, IL	4.1	3.8	3.5
Macoupin, IL	4.4	4.5	4.2
Madison, IL	4.2	4.0	3.7
St. Clair, IL	4.7	4.5	4.2
St. Louis, MO	3.7	4.1	3.7
St. Louis City, MO	4.2	4.6	4.1
State of Missouri	3.7	4.0	3.4
State of Illinois	5.0	4.6	4.7
National Average	4.0	4.3	4.0
Source: U.S. Bureau of Labor Statistics			

Competition

The assessment area has a competitive market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, there were 84 financial institutions operating 544 offices within the area. Heartland ranked 53rd, maintaining a 0.1 percent deposit market share. For the counties of Madison and St. Clair, which were the two areas with offices open during the review period, the bank ranked 26th with a 0.7 percent deposit market share among 36 financial institutions operating 144 offices.

Lending competition is present from banks, credit unions, and non-depository mortgage lenders in the area. The 2024 HMDA aggregate lending data reflects 567 reporting lenders with Heartland ranked 181st with a 0.1 percent market share. For the offices that were open during the review

period, the bank ranked 100th with the same market share. According to 2024 aggregate CRA data, Heartland ranked 59th for small business lending with a 0.1 percent market share among 139 reporting lenders and 26th for small farm lending with a 0.3 percent market share among 35 reporting lenders. At that time, the bank ranked 23rd for small business lending with 0.5 percent market share among 91 lenders in Madison and St. Clair Counties. The bank reported nominal small farm loans in those areas.

Community Contacts

Examiners reviewed two recently conducted contacts to assist in identifying credit needs and opportunities in the St. Louis MSA. One contact involved representatives from multiple organizations in the St. Louis Metro East area, which includes Madison and St. Clair Counties. There was an emphasis placed on the community of East St. Louis, which is in St. Clair County. The representatives were from housing, economic development, and community service-related organizations in the area. The contacts discussed the local economic conditions, housing and business trends, and local credit needs. The other contact was focused on economic development activities, primarily in the St. Louis area.

All of the contacts involved in the East St. Louis area expressed that the local economy is facing challenges related to a declining population and outdated infrastructure, among other things. One representative noted that many contacts left the area for employment and never returned. Residents that remain in the area often have difficulty obtaining good paying jobs and there is a high level of poverty. Affordable housing was identified as a need and it was noted that housing stock needs improvements. Small business activity has been limited as many business owners establish operations outside the area. A representative noted that there is an unbanked and underbanked population in the area. The contacts identified a strong need for financial literacy for consumers and business owners.

The contact in the St. Louis area noted that the local economy is strong and that the small business environment is growing. They noted fluctuations in lending demand due to the rising interest rate environment early in the review period. The contact noted a continued need for affordable housing. Overall, financial institutions are generally meeting banking and credit needs, and creditworthy individuals and businesses can obtain financing. However, the contacts specifically mentioned a need for financial literacy training directed to small businesses and residents in the area.

Credit and Community Development Needs and Opportunities

Considering information from community contacts, bank management, and demographic and economic data, examiners determined that loans for low- and moderate-income individuals, small businesses, and small farms are important needs in the area. In particular, the percentage of low- and moderate-income families at 40.7 percent and 91.3 percent of businesses with GARs of $1 million or less in the assessment area support this conclusion. The contacts identified the need for affordable housing. Opportunities were identified for small business lending, economic development, and supporting community service organizations throughout the area.

SCOPE OF EVALUATION – ST. LOUIS, MO-IL MSA

The rating for the St. Louis, MO-IL MSA is based upon a full-scope evaluation of the bank's performance in this assessment area, as it is the bank's only assessment area in this multistate MSA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ST. LOUIS, MO-IL MSA

LENDING TEST

Heartland demonstrated adequate performance under the Lending Test in the St. Louis MSA.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. This conclusion is mainly supported by performance under the borrower profile criterion and the increase in community development lending during this review period. According to the bank's reported CRA and HMDA loan data from 2023 – 2025, this area accounted for 4.2 percent of lending, by dollar volume. As noted previously, in 2024 the bank ranked 59th in market share for small business loans, 181st for home mortgage loans, and 26th for small farm loans in this assessment area, all based on number of loans. Also, 5.0 percent of all community development lending occurred in this assessment area. During the review period, small farm lending was not a focus in this market and there was not enough loan volume to draw meaningful conclusions about the bank's performance, so this product line was not reviewed.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. Performance among small business and home mortgage lending supports this conclusion. The tables below reflect aggregate lending levels that trailed area demographics in low- income tracts for both product lines, particularly small business loans. Lower aggregate lending levels may be indicative of factors such as limited demand, which impacts the ability of all lenders to penetrate these areas.

As previously mentioned, during the review period, the bank had two offices in this assessment area. The Edwardsville office (Madison County) is in a middle-income census tract, and the Fairview Heights office (St. Clair) is in an upper-income census tract. Madison County had 4 low- and 15 moderate-income tracts. These tracts are primarily located along the western portion of the county bordering the Mississippi River. They are west of the Southern Illinois University campus and are comprised of industrial areas and businesses that leverage the close proximity to the river for shipping. The Edwardsville office is located east of the campus. St. Clair County is directly south of Madison County and had 15 low- and 14 moderate-income tracts. Similarly, these tracts are also primarily located along the western border of the county along the river and encompass the East St. Louis area. Heartland's office is located in Fairview Heights, which is located approximately five miles east of this area.

It is noted that the St. Louis, MO-IL MSA is one multistate MSA divided into two distinct communities by the Mississippi River. The Mississippi River creates a significant barrier to commuting between the two areas. Eight bridges cross the river within the bank's assessment area. Many of the low- and moderate-income tracts are located along the river. These areas often have industrial businesses that utilize easy access to the river for transporting goods. Additionally, these areas often have lower levels of owner-occupied housing than other parts of the assessment area. This is true in both Madison and St. Clair counties, which are the areas that will carry the most weight in overall conclusions.

Small Business Lending

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. There was no lending in the low-income geographies in either year. As mentioned, aggregate lending levels trail the area demographic which can be indicative of challenges that all lenders face in penetrating these areas. Although there were no loans made in the low-income geographies, it was noted that the level of businesses and respective aggregate lending levels in Madison and St. Clair Counties were lower during the review period and are more reflective of limited lending opportunities. Aggregate lending levels trailed area demographics, which further illustrates the challenges that all lenders face penetrating these areas, so the lack of lending is not considered unreasonable. Heartland's performance in moderate-income geographies was stronger. As detailed in the following table, lending performance in 2024 exceeded aggregate lending levels by 12.3 percent and further increased in 2025.

Geographic Distribution of Small Business Loans - St. Louis MSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	8.8	5.9	0	0.0	0	0.0
2025	8.9	--	0	0.0	0	0.0
Moderate						
2024	16.7	14.4	12	26.7	2,823	26.2
2025	16.8	--	14	37.8	3,389	39.5
Middle						
2024	30.4	32.1	21	46.7	5,554	51.5
2025	30.4	--	16	43.2	4,176	48.7
Upper						
2024	43.1	46.5	12	26.7	2,417	22.4
2025	43.0	--	7	18.9	1,009	11.8
NA						
2024	1.0	1.1	0	0.0	0	0.0
2025	1.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**45**	**100.0**	**10,794**	**100.0**
2025	**100.0**	**--**	**37**	**100.0**	**8,574**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Home Mortgage Lending

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area, which is primarily supported by the lending levels in moderate-income geographies. As detailed in the following table, very few owner-occupied housing units in the

assessment area are located in low-income geographies and limited lending occurs in those areas. Owner-occupied housing is more prevalent in the moderate-income tracts. In Madison and St. Clair Counties, the housing units in the low- and moderate-income geographies comprise approximately one third (36.9 percent) of all housing units the area. Only 11.3 percent of the housing units in those counties are located in low-income tracts and less than one-third (32.7 percent) are owner occupied. The remaining units are occupied rentals (43.9 percent) or vacant (23.4 percent). Aggregate lending data for both 2024 and 2025 trailed area demographics, which illustrates the challenges that all lenders face penetrating these areas. The bank did not make any loans in these geographies either year, which is not unreasonable when considering the levels of opportunities.

The level of owner-occupied units in moderate-income geographies was higher, and more lending occurred in those areas as indicated by aggregate lending levels and area demographics; however, approximately half of the housing units in these areas were rentals (31.3 percent) or vacant (14.1 percent). Heartland's lending levels in 2024 were 4.9 percent higher than aggregate. Although they dropped in 2025, this performance is considered adequate overall.

Geographic Distribution of Home Mortgage Loans - St. Louis MSA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	6.3	5.3	0	0.0	0	0.0
2025	6.3	5.4	0	0.0	0	0.0
Moderate						
2024	19.8	20.1	6	25.0	630	15.1
2025	19.8	19.7	4	12.5	452	9.1
Middle						
2024	36.0	38.2	10	41.7	1,415	33.8
2025	36.0	36.7	18	56.3	2,731	55.0
Upper						
2024	37.5	36.1	8	33.3	2,141	51.2
2025	37.5	37.9	10	31.3	1,780	35.9
NA						
2024	0.4	0.4	0	0.0	0	0.0
2025	0.4	0.3	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**24**	**100.0**	**4,186**	**100.0**
2025	**100.0**	**100.0**	**32**	**100.0**	**4,963**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate. Due to rounding, totals may not equal 100.0%.						

Small Farm Lending

Due to the nominal volume of small farm lending in the assessment area, no meaningful conclusions can be drawn regarding the bank's lending performance.

Borrower Profile

The distribution of borrowers reflects adequate penetration among businesses of different sizes and borrowers of different income levels in the assessment area. Heartland's lending performance in originating small business and home mortgage loans supports this conclusion.

Small Business Lending

The distribution of small business loans reflects adequate penetration among businesses of different sizes. As detailed in the following table, Heartland's level of lending to businesses with gross annual revenues of $1 million or less trailed aggregate lending levels in 2024 but increased in 2025. Examiners compared the bank's performance to four other similarly-situated institutions in the areas that were evaluated during the review period and those with similar lending levels were considered to have adequate performance, which supports the conclusion that this performance is adequate.

Distribution of Small Business Loans by Gross Annual Revenue Category - St. Louis MSA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	91.2	53.4	18	40.0	2,292	21.2
2025	91.3	--	22	59.5	3,778	44.1
> $1,000,000						
2024	2.4	--	22	48.9	6,997	64.8
2025	2.2	--	12	32.4	4,056	47.3
Revenue Not Available						
2024	6.4	--	5	11.1	1,505	13.9
2025	6.6	--	3	8.1	740	8.6
Total						
2024	**100.0**	**100.0**	**45**	**100.0**	**10,794**	**100.0**
2025	**100.0**	**--**	**37**	**100.0**	**8,574**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Home Mortgage Lending

The distribution of home mortgage loans to borrowers of different income levels, particularly low- and moderate-incomes, reflects good penetration. Lending levels to low- and moderate-income borrowers were both comparable to aggregate lending data and area demographics. According to the 2020 Census, 8.5 percent of families in the assessment area live below the poverty level. The ability to qualify for a home mortgage loan, particularly under conventional financing would be challenging, which limits the demand and opportunity to lend to these lower-income families. This is a factor considered when analyzing the bank's lending performance in the assessment area and may be partially responsible for the difference between aggregate lending levels and area demographics. Despite these factors, Heartland's performance was more than double aggregate lending levels to low-income borrowers in 2024. The bank's penetration in this income segment dropped significantly in 2025 but was still comparable to aggravated lending levels. As detailed in the following table, lending to moderate-income borrowers is comparable to both aggregate lending levels and area demographics.

Distribution of Home Mortgage Loans by Borrower Income Level - St. Louis MSA						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	22.9	11.6	7	29.2	703	16.8
2025	22.9	12.7	3	9.4	320	6.5
Moderate						
2024	17.8	19.4	4	16.7	420	10.0
2025	17.8	18.9	5	15.6	715	14.4
Middle						
2024	19.8	17.2	5	20.8	818	19.5
2025	19.8	17.4	8	25.0	756	15.2
Upper						
2024	39.5	29.6	8	33.3	2,245	53.6
2025	39.5	27.2	16	50.0	3,172	63.9
NA						
2024	0.0	22.2	0	0.0	0	0.0
2025	0.0	23.9	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**24**	**100.0**	**4,186**	**100.0**
2025	**100.0**	**100.0**	**32**	**100.0**	**4,963**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%.						

Small Farm Lending

Due to the nominal volume of small farm lending in the assessment area, no meaningful conclusions can be drawn regarding the bank's lending performance. It is noted that one of the two loans made in this assessment area each year was for operations reporting GARs of $1 million or less. It is noted that this activity is only reflective of reported loans made prior to the 2026 acquisition.

Innovative or Flexible Lending Practices

Heartland uses flexible lending practices to serve assessment area credit needs. As reflected in the following table, the bank made or facilitated 49 flexible loans totaling $14.7 million. The majority of the loans by dollar amount were made through the Illinois Ag Invest program.

Innovative or Flexible Lending Programs - St. Louis MSA										
Program	**11/14/23-12/31/23**		**2024**		**2025**		**YTD 2026**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Home Possible	-	-	-	-	-	-	1	83	**1**	**83**
Home Ready	-	-	3	268	-	-	1	84	**4**	**352**
FHA	-	-	2	425	-	-	1	113	**3**	**538**
USDA	1	80	1	62	1	80			**3**	**222**
IL Ag Invest	-	-	-	-	-	-	35	10,704	**35**	**10,704**
Advantage Illinois	1	98	1	498	1	2,216	-	-	**3**	**2,812**
Total	**2**	**178**	**7**	**1,253**	**2**	**2,296**	**38**	**10,984**	**49**	**14,711**
Source: Bank Data										

All of these programs primarily benefit low- and moderate-income individuals and small businesses and farms throughout the assessment area.

Community Development Loans

Heartland made an adequate level of community development loans in this assessment area. As reflected in the following table, the bank made 15 community development loans totaling $37.8 million in this assessment area during the evaluation period. This represents 5.0 percent of the bank's total qualified lending in its assessment areas, by dollar volume. Although this area was not separately evaluated during the previous evaluation, it was noted that the bank made two loans totaling $1.4 million during that period. The current level of lending reflects a significant increase.

Community Development Lending – St. Louis MSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	**-**	**-**
2024	2	1,384	-	-	3	15,700	-	-	**5**	**17,084**
2025	3	13,729	-	-	2	4,016	-	-	**5**	**17,745**
YTD 2026	-	-	-	-	5	3,000	-	-	**5**	**3,000**
Total	**5**	**15,113**	**-**	**-**	**10**	**22,716**	**-**	**-**	**15**	**37,829**
Source: Bank Data										

Notable examples of the bank's community development loans in the assessment area include:

- A $1.5 million loan was extended for the construction of a new restaurant located in a TIF District that was developed to encourage redevelopment in the area. This activity supports economic development for the area and results in the creation of permanent jobs for low- and moderate-income individuals.

- A $13.5 million loan was originated to finance the construction of a multifamily housing project located in a low-income census tract. The complex has 36 units that are all leased for rates that are below the fair market rent for the area, which supports affordable housing. The project is structured under the Low-Income Housing Tax Credit (LIHTC) program, and a majority of units will receive rental assistance through the St. Clair County Housing Authority.

INVESTMENT TEST

Heartland demonstrated adequate performance under the Investment Test in the St. Louis MSA assessment area. The bank's adequate level of qualified investments and responsiveness to community development needs supports this conclusion.

Investment and Grant Activity

Heartland has an adequate level of qualified community investments and grants in this assessment area. As detailed in the following table, there were 26 qualified investments, grants, and donations

totaling $8.4 million. This level of activity represents 2.8 percent of the bank's total community development investment activity, by dollar amount. The investment and donation activity in this assessment area was not evaluated during the previous review period. A majority of the investments were in mortgage-backed securities that promote affordable housing. All but two of the bonds were previously held by the acquired institution and remain outstanding.

Qualified Investments – St. Louis MSA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	5	7,683	0	0	0	0	0	0	**5**	**7,683**
11/14/23 - 12/31/23	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-
2025	-	-	-	-	-	-	-	-	-	-
YTD 2026	-	-	2	655	-	-	-	-	**2**	**655**
Subtotal	**5**	**7,683**	**2**	**655**	**-**	**-**	**-**	**-**	**7**	**8,338**
Qualified Grants & Donations	3	2	14	17	2	2	-	-	**19**	**21**
Total	**8**	**7,685**	**16**	**672**	**2**	**2**	**-**	**-**	**26**	**8,359**
Source: Bank Data										

Notable examples of qualified investments made or maintained by the bank during the current review period include:

- A $300,000 general obligation bond was purchased from a school district where a majority of students qualify for free or reduced lunches. The bond provided increased working cash for the district.

- The bank maintained three targeted mortgage-backed securities totaling $7.3 million. The bonds are collateralized by multifamily housing projects located in the assessment area. A majority of the units have rents that are below the fair market rent for the respective areas, which helps support affordable housing, an identified need.

- Heartland donated $1,500 to a local Small Business Development Center that provides advising services to new and existing business owners at no cost.

Responsiveness to Credit and Community Development Needs

Heartland exhibits good responsiveness to credit and community economic development needs in the assessment area. Investments and grants made were consistent with the needs of the assessment area. A majority of the qualified investments and grants, by number and dollar volume, have supported community services and affordable housing, which are needs identified during the current evaluation period.

Community Development Initiatives

The bank rarely uses innovative or complex investments to support community development initiatives. The investments and grants noted above are useful and help promote community development; however, they are generally not innovative or complex by nature.

SERVICE TEST

The service performance reflects adequate responsiveness to the credit and community development needs in the St. Louis MSA. Performance across each of the Service Test criteria supports this conclusion. The area had 2.3 percent of qualified service activity and is home to 10.6 percent of the bank's offices.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of this assessment area. As reflected in the following table, Heartland operates nine offices and eight ATMs in this assessment area. The following table included additional details related to the current offices operating in the St. Louis MSA.

Branch and ATM Distribution by Geography Income Level - St. Louis MSA								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	72	14.6	175,704	9.3	-	-	-	-
Moderate	120	24.4	410,700	21.6	1	11.1	1	12.5
Middle	156	31.7	663,163	34.9	5	55.6	5	62.5
Upper	138	28.1	640,689	33.7	3	33.3	1	12.5
NA	6	1.2	9,622	0.5	-	-	1	12.5
Total	**492**	**100.0**	**1,899,878**	**100.0**	**9**	**100.0**	**8**	**100.0**
Source: 2020 Census Data and Institution Records								

The previous table reflects that, by percentage, the distribution of Heartland's offices in low- and moderate-income census tracts significantly trails the population demographics in these respective areas. It is important to note that the bank's offices in Madison and St. Clair Counties are the only two that were open throughout the entire review period. These offices, and this assessment area, were added as a result of the 2023 acquisition. The Madison County office is located in a middle-income census tract in Edwardsville, and the St. Clair County office is located in an upper-income census tract in Fairview Heights. There are low- and moderate-income geographies in both counties and they are primarily located in more industrial areas along the western edges of the counties bordering the Mississippi River. Heartland's offices are located in relatively close proximity to these geographies and there are numerous other financial institutions in both areas to help serve local residents.

Due to the 2026 acquisition, Heartland has expanded its presence in this market and now has a branch in a moderate-income geography and more offices in proximity to the low- and moderate-income geographies throughout the current assessment area. All of the offices that were added have drive-up access and ATMs, except for the Glen Carbon (Madison County) and Clayton (St. Louis County) offices, which do not offer either service. Additionally, there was a standalone ATM added in a middle-income tract in Shipman (Macoupin County). Additionally, the bank continues

to offer a variety of alternative delivery systems that increase the availability of its loan and deposit products. Most of these delivery systems utilize technology to provide customers with 24-hour access to bank accounts and product information. The bank offers an internet and mobile banking service to pay bills and transfer funds. These alternative delivery systems are available to the entire assessment area, including low- and moderate-income tracts.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or individuals. There were no branches closed in this assessment area during the review period. Heartland added seven offices as a result of the 2026 acquisition. Details for the branches that were added are included in the following table.

Branches Added in 2026 – St. Louis MSA			
City	**County**	**State**	**Census Tract Income Level**
Jerseyville	Jersey	Illinois	Middle
Carlinville	Macoupin	Illinois	Moderate
Brighton	Macoupin	Illinois	Middle
Virden	Macoupin	Illinois	Middle
Alton	Madison	Illinois	Middle
Glen Carbon	Madison	Illinois	Upper
Clayton	St. Louis	Missouri	Upper
Source: Bank Data			

All of the offices that were added have drive-up access and ATMs, except for the Glen Carbon (Madison County) and Clayton (St. Louis County) offices, which do not offer either service. Additionally, there was a standalone ATM added in a middle-income tract in Shipman (Macoupin County). The following table included additional details related to the current offices operating in the St. Louis MSA. The recent branch changes, particularly in the moderate-income geography in Macoupin County will help Heartland more effectively serve the low- and moderate-income portions of the assessment area.

Reasonableness of Business Hours and Services

Services and business hours do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income census tracts and/or individuals. Business hours are generally comparable to the market. Most branch locations are equipped with ATMs, and a majority of branches have drive-up facilities While there are slight differences noted among the lobby hours, drive up capabilities, and ATM access at a limited number of locations, none of them vary in a way that inconveniences any portions of the assessment area, particularly low- or moderate-income geographies.

Community Development Services

Heartland provides an adequate level of community development services. As detailed in the following table, 25 community development services were provided in this assessment area. The services in this assessment area account for 23.3 percent of the institution's total qualified activities.

Of these, 18 are related to technical expertise provided to customers applying for housing grants. As affordable housing for low- and moderate-income individuals is an identified credit need in this area, this activity reflects responsiveness.

Community Development Services – St. Louis MSA					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
11/14/23-12/31/23	1	-	-	-	**1**
2024	10	1	-	-	**11**
2025	4	4	-	-	**8**
YTD 2026	3	2	-	-	**5**
Total	**18**	**7**	**-**	**-**	**25**
Source: Bank Data					

Bank staff have been involved in various community organizations throughout the review period. Staff from the newly expanded offices remain engaged in supporting organizations throughout the newly expanded assessment area. The services provided by Heartland staff have involved serving as Board members and providing classes related to financial literacy. Some notable examples include:

- An employee provides financial expertise to an organization focused on assisting senior citizens, people with disabilities, and veterans with various critical services. The organization helps coordinate various government benefits, helps ensure food stability, transportation, and protective services. The organization receives government funding and grants and primarily assists underserved individuals in the assessment area.

- Heartland utilized several down payment assistance programs in the assessment area, including five FHLBC DPP grants totaling $50,000; three Borrow Smart grants totaling $8,000; one Home Matters Grant for $1,000; and nine IHDA grants totaling $60,000. For each grant awarded, a bank employee provides technical assistance through preparation of the grant application.

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
    i. The proportion of the bank's lending in the bank's assessment area(s);
    ii. The dispersion of lending in the bank's assessment areas(s); and
    iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
    i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
    ii. Small business and small farm loans to businesses and farms with gross annual revenues of $1 million or less;
    iii. Small business and small farm loans by loan amount at origination; and
    iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

1) The dollar amount of qualified investments;
2) The innovativeness or complexity of qualified investments;
3) The responsiveness of qualified investments to available opportunities; and

4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.,* RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

1) The extent to which the bank provides community development services; and
2) The innovativeness and responsiveness of community development services.

SCOPE OF EVALUATION

Heartland Bank & Trust Company	
Scope of Examination: Full scope reviews were performed on the following assessment areas within the noted areas: State of Illinois: Bloomington MSA Champaign MSA Chicago CSA IL Non-MSA State of Iowa: Cedar Rapids-Iowa City, IA CSA St. Louis MSA: St. Louis MSA	
Time Period Reviewed:	11/14/2023 to 6/1/2026
Products Reviewed: <u>State of Illinois</u> Small Business: 1/1/2023 – 12/31/2025 Home Mortgage: 1/1/2023 – 12/31/2025 Small Farm: 1/1/2023 – 12/31/2025 <u>State of Iowa</u> Small Business: 1/1/2023 – 12/31/2025 Home Mortgage: 1/1/2023 – 12/31/2025 Small Farm: 1/1/2023 – 12/31/2025 <u>St. Louis MSA</u> Small Business: 1/1/2023 – 12/31/2025 Home Mortgage: 1/1/2023 – 12/31/2025 Small Farm: 1/1/2023 – 12/31/2025	

List of Assessment Areas and Type of Evaluation			
Rated Area: Assessment Area (as presented)	**Type of Evaluation**	**Branches Visited**	**Other Information**
STATE OF ILLINOIS:			
Bloomington MSA	Full Scope	Home Office	
Champaign MSA	Full Scope		
Chicago CSA	Full Scope	None	When performance is consistent across the MSA and non-MSA portions of the CSA, performance presented at the CSA level.
Chicago-Naperville-Evanston, IL MD #16984		None	
Elgin, IL MD #20994		None	
Lake County-Kenosha County, IL-WI MD #29404		None	
Ottawa, IL Micropolitan Statistical Area #36837		None	
Decatur MSA	Limited Scope	None	
Illinois Nonmetropolitan	Full Scope	None	Part of the Illinois statewide Non-MSA. Portions of the area were added with acquisition of CNB in March 2026.
Peoria MSA	Limited Scope	None	
Springfield MSA	Limited Scope	None	Portions of MSA added as new assessment area with acquisition of Town & Country Bank in February 2023.
STATE OF IOWA:			
Cedar Rapids CSA	Full Scope	None	When performance is consistent across multiple MSAs in the CSA, performance presented at the CSA level.
Cedar Rapids, IA MSA #16300		None	
Iowa City, IA MSA #26980		None	
Waterloo MSA	Limited Scope	None	
ST. LOUIS MO-IL MULTISTATE			
St. Louis MO-IL Multistate MSA	Full Scope	None	Portions of MSA added as new assessment area with acquisition of Town & Country Bank in February 2023.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
ILLINOIS	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
IOWA	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
ST. LOUIS, MO-IL MSA	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

LENDING TEST TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS

Decatur MSA

Geographic Distribution of Small Business Loans - Decatur						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	15.8	18.9	4	14.8	385	9.7
2025	15.1	--	4	14.8	357	11.6
Moderate						
2024	19.5	20.0	3	11.1	650	16.4
2025	19.3	--	6	22.2	975	31.8
Middle						
2024	43.0	41.5	15	55.6	2,193	55.2
2025	43.7	--	15	55.6	1,437	46.8
Upper						
2024	21.2	19.2	5	18.5	745	18.8
2025	21.4	--	2	7.4	300	9.8
NA						
2024	0.6	0.4	0	0.0	0	0.0
2025	0.7	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**27**	**100.0**	**3,973**	**100.0**
2025	**100.0**	**--**	**27**	**100.0**	**3,069**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Geographic Distribution of Home Mortgage Loans - Decatur						
Tract Income Level	**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	4.3	1.5	0	0.0	0	0.0
2025	4.3	2.4	1	1.5	32	0.3
Moderate						
2024	15.6	13.0	7	15.6	674	11.9
2025	15.6	13.0	7	10.1	785	8.0
Middle						
2024	58.7	63.8	33	73.3	4,417	77.7
2025	58.7	60.0	44	63.8	6,041	61.8
Upper						
2024	21.1	21.4	5	11.1	597	10.5
2025	21.1	24.0	17	24.6	2,921	29.9
NA						
2024	0.3	0.3	0	0.0	0	0.0
2025	0.3	0.7	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**45**	**100.0**	**5,688**	**100.0**
2025	**100.0**	**100.0**	**69**	**100.0**	**9,779**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Geographic Distribution of Small Farm Loans - Decatur						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	4.4	--	0	0.0	0	0.0
2025	3.7	--	0	0.0	0	0.0
Moderate						
2024	2.6	--	0	0.0	0	0.0
2025	3.7	--	0	0.0	0	0.0
Middle						
2024	67.8	88.5	0	0.0	0	0.0
2025	66.8	--	0	0.0	0	0.0
Upper						
2024	25.1	11.5	0	0.0	0	0.0
2025	25.5	--	0	0.0	0	0.0
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.4	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**
2025	**100.0**	**--**	**0**	**0.0**	**0**	**0.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Small Business Loans by Gross Annual Revenue Category - Decatur						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	82.6	55.0	12	44.4	1,227	30.9
2025	83.5	--	14	51.9	925	30.1
> $1,000,000						
2024	4.4	--	15	55.6	2,746	69.1
2025	4.0	--	12	44.4	2,094	68.2
Revenue Not Available						
2024	13.0	--	0	0.0	0	0.0
2025	12.5	--	1	3.7	50	1.6
Total						
2024	**100.0**	**100.0**	**27**	**100.0**	**3,973**	**100.0**
2025	**100.0**	**--**	**27**	**100.0**	**3,069**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Home Mortgage Loans by Borrower Income Level - Decatur						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	21.2	11.7	9	20.0	675	11.9
2025	21.2	13.2	5	7.3	347	3.6
Moderate						
2024	17.2	23.6	9	20.0	1,040	18.3
2025	17.2	24.0	18	26.1	2,038	20.8
Middle						
2024	21.4	21.1	14	31.1	1,584	27.9
2025	21.4	19.8	18	26.1	1,825	18.7
Upper						
2024	40.2	24.2	9	20.0	2,073	36.5
2025	40.2	24.9	21	30.4	3,992	40.8
NA						
2024	0.0	19.4	4	8.9	316	5.6
2025	0.0	18.1	7	10.1	1,577	16.1
Total						
2024	**100.0**	**100.0**	**45**	**100.0**	**5,688**	**100.0**
2025	**100.0**	**100.0**	**69**	**100.0**	**9,779**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Distribution of Small Farm Loans by Gross Annual Revenue Category - Decatur						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	98.7	46.2	0	0.0	0	0.0
2025	98.9	--	0	0.0	0	0.0
> $1,000,000						
2024	0.9	--	0	0.0	0	0.0
2025	0.4	--	0	0.0	0	0.0
Revenue Not Available						
2024	0.4	--	0	0.0	0	0.0
2025	0.7	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**
2025	**100.0**	**--**	**0**	**0.0**	**0**	**0.0**
Source: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Peoria MSA

Geographic Distribution of Small Business Loans - Peoria						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	9.2	7.2	7	6.4	1,368	6.8
2025	9.1	--	5	3.9	1,379	6.2
Moderate						
2024	13.9	12.0	6	5.5	1,360	6.8
2025	14.0	--	13	10.1	1,115	5.0
Middle						
2024	50.2	48.9	73	66.4	12,188	60.9
2025	50.3	--	88	68.2	15,965	71.3
Upper						
2024	26.8	31.9	24	21.8	5,091	25.5
2025	26.6	--	23	17.8	3,933	17.6
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**110**	**100.0**	**20,007**	**100.0**
2025	**100.0**	**--**	**129**	**100.0**	**22,392**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Geographic Distribution of Home Mortgage Loans - Peoria						
Tract Income Level	**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	2.4	1.3	1	2.2	96	1.6
2025	2.4	1.4	1	1.2	32	0.4
Moderate						
2024	16.1	16.9	0	0.0	0	0.0
2025	16.1	16.6	8	9.4	526	6.1
Middle						
2024	56.8	56.9	34	75.6	3,782	63.3
2025	56.8	57.0	49	57.7	5,006	57.8
Upper						
2024	24.7	24.9	10	22.2	2,101	35.1
2025	24.7	24.9	27	31.8	3,093	35.7
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	0.0	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**45**	**100.0**	**5,979**	**100.0**
2025	**100.0**	**100.0**	**85**	**100.0**	**8,657**	**100.0**
Source: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Geographic Distribution of Small Farm Loans - Peoria						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	1.1	0.2	1	1.7	110	1.4
2025	1.3	--	1	1.9	110	1.7
Moderate						
2024	7.3	5.9	0	0.0	0	0.0
2025	7.0	--	0	0.0	0	0.0
Middle						
2024	66.7	75.7	46	79.3	6,410	81.7
2025	65.3	--	46	86.8	5,780	87.0
Upper						
2024	24.9	18.3	11	19.0	1,324	16.9
2025	26.4	--	6	11.3	751	11.3
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**58**	**100.0**	**7,844**	**100.0**
2025	**100.0**	**--**	**53**	**100.0**	**6,641**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Small Business Loans by Gross Annual Revenue Category - Peoria						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	82.8	52.5	58	52.7	5,235	26.2
2025	83.6	--	71	55.0	5,951	26.6
> $1,000,000						
2024	4.6	--	46	41.8	13,824	69.1
2025	4.1	--	49	38.0	15,293	68.3
Revenue Not Available						
2024	12.7	--	6	5.5	948	4.7
2025	12.2	--	9	7.0	1,148	5.1
Total						
2024	**100.0**	**100.0**	**110**	**100.0**	**20,007**	**100.0**
2025	**100.0**	**--**	**129**	**100.0**	**22,392**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Home Mortgage Loans by Borrower Income Level - Peoria						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	19.4	13.9	5	11.1	304	5.1
2025	19.4	13.7	10	11.8	579	6.7
Moderate						
2024	18.5	22.9	8	17.8	785	13.1
2025	18.5	23.0	18	21.2	1,405	16.2
Middle						
2024	21.6	21.1	10	22.2	1,238	20.7
2025	21.6	20.0	18	21.2	1,742	20.1
Upper						
2024	40.5	28.8	18	40.0	3,199	53.5
2025	40.5	28.6	31	36.5	3,586	41.4
NA						
2024	0.0	13.4	4	8.9	453	7.6
2025	0.0	14.7	8	9.4	1,345	15.5
Total						
2024	**100.0**	**100.0**	**45**	**100.0**	**5,979**	**100.0**
2025	**100.0**	**100.0**	**85**	**100.0**	**8,657**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Distribution of Small Farm Loans by Gross Annual Revenue Category - Peoria						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	97.9	61.9	49	84.5	5,998	76.5
2025	98.2	--	40	75.5	4,242	63.9
> $1,000,000						
2024	0.9	--	7	12.1	1,737	22.1
2025	0.8	--	9	17.0	1,960	29.5
Revenue Not Available						
2024	1.2	--	2	3.5	109	1.4
2025	1.1	--	4	7.6	439	6.6
Total						
2024	**100.0**	**100.0**	**58**	**100.0**	**7,844**	**100.0**
2025	**100.0**	**--**	**53**	**100.0**	**6,641**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Springfield MSA

Geographic Distribution of Small Business Loans - Springfield						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	10.3	9.8	10	21.3	2,324	20.3
2025	9.0	--	7	15.6	2,732	25.2
Moderate						
2024	19.2	15.5	10	21.3	2,011	17.5
2025	26.2	--	14	31.1	1,891	17.5
Middle						
2024	17.0	20.7	9	19.2	2,021	17.6
2025	14.7	--	9	20.0	1,738	16.1
Upper						
2024	53.5	54.1	18	38.3	5,110	44.6
2025	50.2	--	15	33.3	4,463	41.2
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**47**	**100.0**	**11,466**	**100.0**
2025	**100.0**	**--**	**45**	**100.0**	**10,824**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Geographic Distribution of Home Mortgage Loans - Springfield						
Tract Income Level	**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	7.9	7.3	6	7.0	416	3.0
2025	7.9	6.1	11	7.8	728	4.6
Moderate						
2024	19.5	21.8	22	25.6	2,231	16.2
2025	19.5	22.7	39	27.7	3,492	21.9
Middle						
2024	31.9	29.6	28	32.6	3,615	26.3
2025	31.9	29.5	45	31.9	4,318	27.1
Upper						
2024	40.7	41.3	30	34.9	7,472	54.4
2025	40.7	41.7	46	32.6	7,386	46.4
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	0.0	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**86**	**100.0**	**13,734**	**100.0**
2025	**100.0**	**100.0**	**141**	**100.0**	**15,924**	**100.0**
Sources: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Geographic Distribution of Small Farm Loans - Springfield						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	3.8	--	0	0.0	0	0.0
2025	3.8	--	0	0.0	0	0.0
Moderate						
2024	5.3	--	0	0.0	0	0.0
2025	8.8	--	0	0.0	0	0.0
Middle						
2024	42.6	63.5	4	57.1	597	57.9
2025	37.9	--	5	83.3	942	86.3
Upper						
2024	48.3	36.5	3	42.9	434	42.1
2025	49.5	--	1	16.7	150	13.7
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**7**	**100.0**	**1,031**	**100.0**
2025	**100.0**	**--**	**6**	**100.0**	**1,092**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Small Business Loans by Gross Annual Revenue Category - Springfield						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	87.5	54.5	21	44.7	3,044	26.6
2025	89.3	--	23	51.1	4,906	45.3
> $1,000,000						
2024	3.0	--	24	51.1	8,301	72.4
2025	2.4	--	20	44.4	5,643	52.1
Revenue Not Available						
2024	9.5	--	2	4.3	121	1.1
2025	8.4	--	2	4.4	275	2.5
Total						
2024	**100.0**	**100.0**	**47**	**100.0**	**11,466**	**100.0**
2025	**100.0**	**--**	**45**	**100.0**	**10,824**	**100.0**
Sources: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Home Mortgage Loans by Borrower Income Level - Springfield						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	23.8	13.6	15	17.4	1,227	8.9
2025	23.8	15.6	27	19.2	1,904	12.0
Moderate						
2024	15.8	21.4	25	29.1	3,443	25.1
2025	15.8	20.1	46	32.6	4,954	31.1
Middle						
2024	20.8	20.3	13	15.1	2,161	15.7
2025	20.8	20.1	29	20.6	2,883	18.1
Upper						
2024	39.6	26.9	29	33.7	6,527	47.5
2025	39.6	25.1	30	21.3	4,924	30.9
NA						
2024	0.0	17.9	4	4.7	376	2.7
2025	0.0	19.1	9	6.4	1,259	7.9
Total						
2024	**100.0**	**100.0**	**86**	**100.0**	**13,734**	**100.0**
2025	**100.0**	**100.0**	**141**	**100.0**	**15,924**	**100.0**
Source: 2020 Census; Imported Bank Data; 2024 HMDA Aggregate Data 2025 HMDA Aggregate Data is not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Small Farm Loans by Gross Annual Revenue Category - Springfield						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	98.0	61.5	5	71.4	849	82.4
2025	98.2	--	4	66.7	860	78.8
> $1,000,000						
2024	0.6	--	1	14.3	100	9.7
2025	0.5	--	1	16.7	150	13.7
Revenue Not Available						
2024	1.4	--	1	14.3	82	8.0
2025	1.4	--	1	16.7	82	7.5
Total						
2024	**100.0**	**100.0**	**7**	**100.0**	**1,031**	**100.0**
2025	**100.0**	**--**	**6**	**100.0**	**1,092**	**100.0**
Source: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Waterloo MSA

Geographic Distribution of Small Business Loans - Waterloo MSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	7.2	8.7	0	0.0	0	0.0
2025	6.8	--	0	0.0	0	0.0
Moderate						
2024	31.3	15.1	2	18.2	130	11.3
2025	35.5	--	0	0.0	0	0.0
Middle						
2024	45.6	51.8	7	63.6	984	85.7
2025	42.8	--	5	100.0	1,630	100.0
Upper						
2024	15.9	24.3	2	18.2	34	3.0
2025	15.0	--	0	0.0	0	0.0
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**11**	**100.0**	**1,148**	**100.0**
2025	**100.0**	**--**	**5**	**100.0**	**1,630**	**100.0**
Source: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Geographic Distribution of Home Mortgage Loans - Waterloo IA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	5.1	6.5	1	100.0	66	100.0
2025	5.1	5.5	0	0.0	0	0.0
Moderate						
2024	13.7	13.3	0	0.0	0	0.0
2025	13.7	13.4	0	0.0	0	0.0
Middle						
2024	58.5	57.5	0	0.0	0	0.0
2025	58.5	56.6	1	100.0	177	100.0
Upper						
2024	22.7	22.8	0	0.0	0	0.0
2025	22.7	24.5	0	0.0	0	0.0
NA						
2024	0.0	0.0	0	0.0	0	0.0
2025	0.0	0.0	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**1**	**100.0**	**66**	**100.0**
2025	**100.0**	**100.0**	**1**	**100.0**	**177**	**100.0**
Source: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Geographic Distribution of Small Farm Loans - Waterloo IA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	0.9	--	0	0.0	0	0.0
2025	1.1	--	0	0.0	0	0.0
Moderate						
2024	10.8	1.7	0	0.0	0	0.0
2025	15.0	--	0	0.0	0	0.0
Middle						
2024	61.2	52.2	5	83.3	795	91.4
2025	56.9	--	2	66.7	325	81.3
Upper						
2024	27.1	46.1	1	16.7	75	8.6
2025	27.1	--	1	33.3	75	18.8
NA						
2024	0.0	--	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**6**	**100.0**	**870**	**100.0**
2025	**100.0**	**--**	**3**	**100.0**	**400**	**100.0**
Source: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Small Business Loans by Gross Annual Revenue Category - Waterloo IA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	89.0	54.3	8	72.7	518	45.1
2025	84.8	--	3	60.0	130	8.0
> $1,000,000						
2024	2.7	--	3	27.3	630	54.9
2025	2.3	--	1	20.0	500	30.7
Revenue Not Available						
2024	8.3	--	0	0.0	0	0.0
2025	12.9	--	1	20.0	1,000	61.4
Total						
2024	**100.0**	**100.0**	**11**	**100.0**	**1,148**	**100.0**
2025	**100.0**	**--**	**5**	**100.0**	**1,630**	**100.0**
Source: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

Distribution of Home Mortgage Loans by Borrower Income Level - Waterloo IA						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	23.4	11.2	0	0.0	0	0.0
2025	23.4	12.0	0	0.0	0	0.0
Moderate						
2024	18.0	23.9	0	0.0	0	0.0
2025	18.0	21.3	0	0.0	0	0.0
Middle						
2024	20.6	22.0	0	0.0	0	0.0
2025	20.6	21.4	0	0.0	0	0.0
Upper						
2024	38.1	26.3	0	0.0	0	0.0
2025	38.1	26.8	1	100.0	177	100.0
NA						
2024	0.0	16.6	1	100.0	66	100.0
2025	0.0	18.5	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**1**	**100.0**	**66**	**100.0**
2025	**100.0**	**100.0**	**1**	**100.0**	**177**	**100.0**
Source: 2020 Census; Imported Bank Data; 2024 and 2025 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.						

Distribution of Small Farm Loans by Gross Annual Revenue Category - Waterloo IA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	98.5	43.5	3	50.0	235	27.0
2025	98.6	--	3	100.0	400	100.0
> $1,000,000						
2024	0.6	--	3	50.0	635	73.0
2025	0.5	--	0	0.0	0	0.0
Revenue Not Available						
2024	0.9	--	0	0.0	0	0.0
2025	0.9	--	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**6**	**100.0**	**870**	**100.0**
2025	**100.0**	**--**	**3**	**100.0**	**400**	**100.0**
Source: 2025, 2024 D&B Data; Bank Data; 2024 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%.*						

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five-year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

(1) Support affordable housing for low- and moderate-income individuals;
(2) Target community services toward low- and moderate-income individuals;
(3) Promote economic development by financing small businesses or farms; or
(4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

(1) Has as its primary purpose community development; and

(2) Except in the case of a wholesale or limited purpose bank:

(i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and

(ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

(1) Has as its primary purpose community development;

(2) Is related to the provision of financial services; and

(3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

(1) An unemployment rate of at least 1.5 times the national average;
(2) A poverty rate of 20 percent or more; or
(3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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

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

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA helps SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of $500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.