



FHLBank
Chicago

ANTI-PREDATORY LENDING POLICY

APPROVED BY: Board of Directors

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I. Introduction

The mission of the Federal Home Loan Bank of Chicago (“FHLBank Chicago”) is to partner with our member shareholders in Illinois and Wisconsin to provide competitively priced funding, a reasonable return on their investment in the FHLBank Chicago, and support for community investment activities. This includes support for the expansion of affordable and equitable homeownership through products and services such as secured financing and mortgage purchases.

The FHLBank Chicago recognizes that predatory lending practices, including higher-priced mortgages, are inconsistent with advancing homeownership. To discourage predatory lending, the FHLBank Chicago has established this Anti-Predatory Lending Policy (“Policy”) that applies to both collateral pledged to the FHLBank Chicago and mortgage loans the FHLBank Chicago acquires and holds on the FHLBank Chicago’s balance sheet through the MPF® Program from its own Members. This Policy does not apply to mortgage loans sold to Fannie Mae through the MPF® Program.

This Policy is adopted by the Board of Directors of FHLBank Chicago on March 6, 2026, and is effective July 1, 2026.

II. Definitions

The following definitions apply to capitalized terms used in this Policy:

Collateral: Residential mortgage loans or mortgage-backed securities pledged by Members to the FHLBank Chicago.

Higher-Priced Mortgage Loan: A mortgage loan that is considered to be a higher-priced mortgage loan according to Regulation Z (12 CFR Part 1026) implementing the Truth in Lending Act.

Interagency Guidance: *The Interagency Guidance on Nontraditional Mortgage Product Risks* (issued October 4, 2006) and the *Statement on Subprime Mortgage Lending* (issued on July 10, 2007) (collectively, the "Interagency Guidance") issued by the Office of the Comptroller of the Currency, Office of the Thrift Supervision, Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and the National Credit Union Administration.

Members: FHLBank Chicago members and, if applicable, their affiliates pledging Collateral on their behalf to the FHLBank Chicago or FHLBank Chicago members that sell mortgage loans to the FHLBank Chicago under the MPF Program.

MPF Loans: Residential mortgage loans purchased by the FHLBank Chicago under the MPF Program for the FHLBank Chicago's portfolio.

MPF Program: Mortgage Partnership Finance® (MPF) Program.

Nontraditional Mortgage Loan: A held for investment closed-end, first-lien or a simultaneous second-lien residential mortgage secured by a 1-4 family residential property that allows the borrower to defer the payment of principal and interest, such as, for example: interest-only mortgage, payment-option adjustable rate mortgage, and negative amortization mortgage.

Participating Financial Institution (PFI): A member of the FHLBank Chicago approved to sell MPF Loans.

Predatory Mortgage Loan: A mortgage loan that is considered to be predatory according to federal, state or local laws, rules and regulations (collectively, "Anti-Predatory Lending Laws"). This definition also includes any mortgage-backed securities that consist of Predatory Mortgage Loans.

Qualified Mortgage ("QM") Loans: A category of residential mortgage loan defined under the Truth in Lending Act (Regulation Z) and implemented by the Consumer Financial Protection Bureau (CFPB) as part of the Ability-to-Repay (ATR) Rule introduced by the Dodd-Frank Act. The purpose of QM is to ensure safer lending practices and protect borrowers by requiring lenders to make a reasonable, good-faith determination that the borrower can repay the loan according to its terms.

Subprime Mortgage Loan:

For Collateral: A held for investment, first-lien mortgage loan or simultaneous second-lien loan secured by a 1-4 family residential property made at the time of origination to a borrower with:

- A representative credit score of 660 or below; or
- If a credit score is not available, a total debt-to-income (DTI) ratio of 50% or greater; or
- Any loan where both a credit score and DTI ratio are not available.

Subprime Mortgage Loans do not include loans pledged by the member as held-for-sale or 1-4 family investor properties underwritten using a debt service coverage ratio (i.e., rental cash flows) rather than a DTI. Subprime Mortgage Loan does not include loans originated under a government agency insured/guaranteed program (FHA, VA, HUD or RHS) .

- **For MPF Loans:** A first-lien mortgage loan or a simultaneous second-lien loan secured by a 1-4 family residential property made at the time of origination to a borrower with a representative credit score of 620 or below for manually underwritten loans; or any mortgage loan that does not meet applicable laws and regulations, or conform to the underwriting and loan eligibility standards set forth in the MPF Guides; or
- If a credit score is not available:
 - A DTI ratio of 43% or greater for a conventional mortgage loan underwritten manually; or
 - Any DTI ratio for a conventional mortgage loan underwritten with Fannie Mae or Freddie Mac's automated underwriting system ("AUS") that received a recommendation/decision that the loan is not acceptable and eligible for sale to the respective agency.

Subprime Mortgage Loan does not include MPF Loans originated under a government agency insured/guaranteed program (FHA, VA, HUD or RHS) or a mortgage loan originated under a product that is specifically designed to support homeownership for low-to-moderate income borrowers (e.g., Habitat for Humanity loans). Subprime Mortgage Loan also does not include any mortgage loan underwritten with Fannie Mae's automated underwriting system ("AUS") – Desktop Underwriter ("DU") – that receives an "Approve/Eligible" finding or Freddie Mac's automated underwriting system – Loan Product Advisor ("LPA") – that receives an "Accept/Eligible" finding regardless of the borrower(s)' credit score(s) associated with the loan.

III. Policy

A. PREDATORY MORTGAGE LOANS

The FHLBank Chicago will not give collateral value for a Predatory Mortgage Loan or knowingly purchase a Predatory Mortgage Loan.

In addition to complying with Anti-Predatory Lending Laws, Collateral and MPF Loans **must not:**

- Require the borrower to obtain prepaid, single-premium credit life, credit disability, credit unemployment or other similar credit insurance as a condition of the loan;
- Contain a mandatory arbitration provision with respect to dispute resolution;
- Violate the Home Ownership and Equity Protection Act of 1994, as amended, and its implementing regulations (collectively, "HOEPA Requirements");
- Violate the prohibited acts or practices in connection with Higher-priced Mortgage Loans set forth in Regulation Z (12 CFR Part 226) implementing the Truth in Lending Act;
- Violate the Ability to Repay requirements set forth in Regulation Z (12 CFR Part 1026) implementing the Truth in Lending Act;
- Violate the disclosure requirements set in forth in Regulation X (12 CFR Part 1024) implementing the Real Estate Settlement Procedures Act and Regulation Z (12 CFR Part 226) implementing the Truth in Lending Act;
- Be identified by a Member's primary regulator as having predatory lending characteristics;
- Be an MPF Loan that is ineligible for inclusion in a structured finance transaction due to a rating agency's determination that it cannot rate a transaction which includes such loan; and
- Be an MPF Loan that fails to comply with any requirement of the MPF Program relating to predatory lending, including without limitation, any related requirements contained in the MPF Guides;
- Be an MPF Loan that charges a prepayment penalty for paying off the loan.

B. SUBPRIME MORTGAGE LOANS, NONTRADITIONAL MORTGAGE LOANS AND HIGHER-PRICED MORTGAGE LOANS

1. Collateral

Only mortgage loans and private label mortgage backed securities ("PLMBS") meeting the criteria below are eligible to be Collateral.

a) Subprime and Nontraditional Mortgage Loans

Subject to meeting the eligibility requirements set forth in the Collateral Guidelines, Subprime Mortgage Loans and Nontraditional Mortgage Loans are eligible to be pledged to the FHLBank Chicago as collateral if they meet one of the following criteria:

- The Subprime Mortgage Loan or Nontraditional Mortgage Loan was originated or acquired by the Member on or prior to July 10, 2007; or
- The Subprime Mortgage Loan or Nontraditional Mortgage Loan was originated or acquired by the Member after July 10, 2007 and the loan is in full compliance with the Interagency Guidance.

Members are required to certify to the FHLBank Chicago that all Subprime Mortgage Loans and Nontraditional Mortgage Loans pledged as Collateral comply with this Policy and all aspects of the Interagency Guidance.

Eligible first-lien Subprime Mortgage Loans will be subject to an additional discount factor as outlined in the Collateral Guidelines while eligible first-lien Nontraditional Mortgage Loans will be subject to an additional discount factor if the concentration exceeds 85% of a Member's total pledged 1-4 family residential mortgage unpaid principal balance.

For second-lien mortgages, the FHLBank Chicago's margin for all second-lien mortgages, regardless of the actual concentration level, already includes a discount factor for the additional risk of subprime and non-traditional mortgages loans.

b) Higher-Priced Mortgage Loans

Loans identified as Higher-Priced Mortgage Loans may be acceptable provided:

1. The Member is identified as exempt from escrow requirements for serving a rural or underserved area; or
2. Closing disclosures stipulate escrow accounts are established and maintained as follows:
 - a. Originations prior to January 1, 2014: One (1) year
 - b. Originations on or after January 1, 2014: Five (5) years

c) Private Label Mortgage Backed Securities (PLMBS)

PLMBS are eligible to be Collateral if they meet one of the following criteria:

1. The PLMBS was acquired by the Member on or prior to July 10, 2007; or
2. The PLMBS was acquired by the Member after July 10, 2007 and one of the following:
 - a. The issuer of the PLMBS provides representations and warranties to the FHLBank Chicago that the underlying mortgages comply with all aspects of the Interagency Guidance; or

- b. The issuer of the PLMBS or the prospectus confirms that the underlying loans were underwritten evaluating the borrower's ability to repay on a fully indexed basis; or
- c. The current unpaid principal balance of loans that meet any of the criteria below do not exceed 5% of the total current unpaid principal balance:
 - i. The credit score of the borrower at origination was 660 or below;
 - ii. If a credit score is not available, the Debt-to-Income ratio at origination was above 50% unless the loan is seasoned greater than 5 years and is currently performing; or
 - iii. The loans are comprised of closed end, adjustable-rate first-lien, or a simultaneous second-lien residential mortgage loan that allows the borrower to defer payment of principal or interest.

For any PLMBS that contain any loans meeting the criteria in 2.c above, the unpaid principal balance will be subtracted prior to calculating the Collateral Loan Value (as defined in the Collateral Guidelines).

2. MPF Loans

a) Subprime Mortgage Loans

The FHLBank of Chicago acquires only Qualified Mortgages (QM) onto its balance sheet. Subprime Mortgage Loans are ineligible for funding under the MPF Program as they are not considered QM.

b) Nontraditional Mortgage Loans

The FHLBank of Chicago acquires only QM onto its balance sheet. Nontraditional Mortgage Loans are not eligible for sale or purchase by the FHLBank Chicago as they are not considered QM.

c) Higher-priced Mortgage Loans

Higher-Priced Mortgage Loans that do not meet QM standards are not eligible for sale or purchase by the FHLBank Chicago.

IV. Monitoring

The FHLBank Chicago monitors Members' compliance with this Policy through its Anti-Predatory Lending Monitoring Procedures as follows:

For Collateral

1. Member Credit monitors Member regulator and government agency examination reports, supervisory agreements, memoranda of understanding, or cease and desist orders pertaining to predatory lending practices, subprime and nontraditional mortgages;
2. Collateral Operations requires Members to certify periodically that Collateral meets the requirements of this Policy;
3. Markets Credit monitors the levels of pledged Nontraditional Mortgage Loans Members have identified in periodic Collateral reporting and advises Collateral Operations of any change to Collateral discounts;
4. Collateral Verifications reviews Collateral as part of the CVR process to ensure compliance with this Policy and the Interagency Guidance, and gathers data during reviews that is used to identify Subprime Mortgage Loans and Nontraditional Mortgage Loans that may be subject to additional discounts as outlined in the Collateral Guidelines.

For MPF Loans

1. The FHLBank Chicago reviews Anti-Predatory Lending Questionnaires submitted by Members as PFIs permitted to sell mortgage loans to the MPF Program, to verify that each PFI is capable of originating MPF Loans that are in compliance with this Policy;
2. On an annual basis, the FHLBank Chicago reviews reporting by its PFIs, of any regulator and government agency examination findings pertaining to predatory lending practices, subprime and nontraditional mortgages. ;
3. The FHLBank Chicago's Member Credit team monitors Member regulator and government agency examination reports, supervisory agreements, memoranda of understanding, or cease and desist orders pertaining to predatory lending practices, subprime and nontraditional mortgages;
4. On an annual basis, the FHLBank Chicago reviews reporting by its PFIs of any changes to their loan origination quality control ("QC") program to verify MPF Loans are in compliance with this Policy; and
5. The MPF QC Team performs QC reviews on sampled MPF Loans sold by PFIs to verify compliance with this Policy.

V. Noncompliance with Policy

In the event Collateral is found not to comply with this Policy, in addition to all available rights and remedies at law or in equity, the FHLBank Chicago will value such Collateral at zero and/or require the Member to substitute eligible Collateral and indemnify the FHLBank Chicago for any damage incurred by the FHLBank Chicago in connection with any ineligible Collateral.

In the event an MPF Loan in the FHLBank Chicago's portfolio is found not to comply with this Policy, the FHLBank Chicago will, in addition to all available rights and remedies at law or in equity, require the PFI to immediately repurchase the MPF Loan and indemnify the FHLBank Chicago for any damages incurred by the FHLBank Chicago in connection with any ineligible MPF Loan.

In addition, the FHLBank Chicago may require the Member to undertake a review of its policies, practices and procedures for compliance with Anti-Predatory Lending Laws and this Policy.

VI. Communication

In order to ensure effective communication to all interested parties, this Policy is included in the FHLBank Chicago's Member Products and Credit Policy and is posted on the FHLBank Chicago's public website.

Additionally, all new Members receive a copy of the Policy at the time of application to become a Member.

VII. Roles and Responsibility

The parties responsible for implementing, monitoring and managing this Policy are the Bank departments responsible for the monitoring duties stated in the Monitoring section of this Policy. The Anti-Predatory Lending Policy is reviewed and approved every three years, or sooner if needed by regulations or business needs.

VIII. Signature Block

This Policy is reviewed and approved by the Board of Directors of the FHLBank Chicago.

APPROVED BY THE BOARD OF
DIRECTORS THIS 6th DAY OF
MARCH 2026

Its Corporate Secretary