

# **Community Reinvestment Act Public File**



# Public Comments

## **2023**

No public comments received.

## **2024**

No public comments received.

## **2025**

No public comments received.

# **PUBLIC DISCLOSURE**

December 1, 2025

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Bank of Luxemburg  
Certificate Number: 13264

630 Main Street  
Luxemburg, Wisconsin 54217

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.

## TABLE OF CONTENTS

INSTITUTION RATING .....	1
DESCRIPTION OF INSTITUTION .....	1
DESCRIPTION OF ASSESSMENT AREAS.....	3
SCOPE OF EVALUATION.....	3
CONCLUSIONS ON PERFORMANCE CRITERIA.....	5
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	9
GREEN BAY MSA ASSESSMENT AREA – Full-Scope Review.....	9
NON-MSA ASSESSMENT AREA – Limited-Scope Review .....	17
APPENDICES .....	21
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA .....	21
GLOSSARY .....	22

## 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 (AA), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and AA credit needs.
- The bank made a majority of its home mortgage and small business loans within the AAs.
- The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the AAs.
- The distribution of borrowers reflects reasonable penetration of loans among individuals of different income levels and businesses of different sizes.
- Since the previous evaluation, the institution did not receive any CRA-related complaints; therefore, this factor did not affect the rating.

**The Community Development Test is rated Satisfactory.**

- The institution demonstrated adequate responsiveness to the community development needs of its AAs through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the AAs.

## DESCRIPTION OF INSTITUTION

Bank of Luxemburg is a \$720.7 million community bank headquartered in Luxemburg, Wisconsin. The bank is wholly owned by a one-bank holding company, Luxemburg Bancshares, Inc., also located in Luxemburg. Based on Interagency Intermediate Small Institution Examination Procedures, Bank of Luxemburg received a Satisfactory rating at its last FDIC Performance Evaluation dated February 13, 2023.

In addition to its main office, Bank of Luxemburg operates eight full-service branches located in Algoma, Casco, Dyckesville, Fish Creek, Green Bay, Howard, Kewaunee, and Surgeon Bay. According to the 2020 U.S. Census, all offices are located in middle-income census tracts (CTs). The bank has no subsidiaries or affiliates involved in lending activities, and no merger or acquisition activities have occurred since the previous evaluation.

Bank of Luxemburg offers a variety of loan products including commercial, home mortgage, agricultural, and consumer loans. The institution's primary business focus continues to be commercial and residential real estate lending. The bank offers several retail deposit products and services, including both checking and savings accounts with no minimum balance requirements or

service fees. Other deposit accounts consist of various checking and savings accounts, money market accounts, health savings accounts, and certificates of deposit.

In addition, Bank of Luxemburg offers investment management, financial planning, and retirement services. Alternative banking services include online and mobile banking, external transfers, bill pay, online consumer and mortgage applications, online deposit account opening, text banking, mobile deposit, and person-to-person payments. The bank also offers seven automated and three interactive teller machines.

Based on the September 30, 2025, Call Report, Bank of Luxemburg reported total assets of \$720.7 million, total securities of \$124.5 million, total deposits of \$628.4 million, and net loans of \$544.1 million. Since the prior evaluation, total assets increased 24.2 percent, total securities increased 2.2 percent, total deposits increased 22.7 percent, and net loans increased 30.7 percent. The following table illustrates the loan portfolio.

<b>Loan Portfolio Distribution as of 9/30/25</b>		
<b>Loan Category</b>	<b>\$ (000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	34,856	6.3
Secured by Farmland	18,072	3.3
Secured by 1-4 Family Residential Properties	129,060	23.5
Secured by Multifamily (5 or more) Residential Properties	53,656	9.8
Secured by Non-farm Nonresidential Properties	211,474	38.5
<b>Total Real Estate Loans</b>	<b>447,118</b>	<b>81.4</b>
Agricultural Loans	5,677	1.0
Commercial and Industrial Loans	75,442	13.7
Consumer Loans	11,464	2.1
Obligations of State and Political Subdivisions in the U.S.	9,453	1.7
Other Loans	123	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>549,277</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income. Due to rounding, totals may not equal 100.0%.</i>		

As the above table reflects, commercial lending is 52.2 percent of the total loan portfolio while residential real estate is 33.3 percent. As was the case with the previous evaluation, commercial loans remain the bank's largest portfolio product. Although the data contained in the table above represents the dollar volume of all outstanding loans as of September 30, 2025, it does not reflect balances that have been paid off or loans that may have originated and subsequently been sold on the secondary market. Bank of Luxemburg sells a sizeable portion of its residential real estate loans on the secondary market through Freddie Mac and the Federal Home Loan Bank. These loans are typically not reflected in the Call Report data, depending on the timing of the sale, and therefore, they are not included in the above figures. The secondary market activity significantly increases the bank's home mortgage lending levels, by number and dollar volume, from the above data. The bank originated and sold into the secondary market 35 home mortgage loans for \$7.9 million in 2023 and 84 for \$22.4 million in 2024.

Examiners did not identify any financial, legal, or other impediments that would limit the institution’s ability to meet the credit needs of the AAs.

## DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which its CRA performance will be evaluated. Bank of Luxemburg’s AAs remain unchanged since the previous evaluation with the bank designating two adjacent AAs. The AAs do not arbitrarily exclude any low- and moderate-income CTs, do not reflect illegal discrimination, and otherwise meet the requirements of the CRA regulation. The following table presents a brief description of each AA. Discussions of demographic and economic information for each AA are in the Description of Institution’s Operations section.

Assessment Area Breakdown of Loans, Deposits, and Branches							
AA Name	Counties in AA	Loans		Deposits		Branches	
		#	%	\$(000s)	%	#	%
Green Bay MSA	Brown and Kewaunee	420	72.4	527,066	84.9	7	77.8
Non-MSA	Door	160	27.6	93,654	15.1	2	22.2
<b>Totals</b>		<b>580</b>	<b>100.0</b>	<b>620,720</b>	<b>100</b>	<b>9</b>	<b>100.0</b>

*Source: Bank Records; FDIC Summary of Deposits (06/30/25); 2022, 2023, 2024 HMDA Loans in the AAs.*

## SCOPE OF EVALUATION

### General Information

This evaluation covers the period from the prior evaluation dated February 13, 2023, to the current evaluation dated December 1, 2025. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate Bank of Luxemburg’s CRA performance. These procedures include two tests: the CRA Small Bank Lending Test and the Community Development Test. The performance criteria related to these tests are detailed in the Appendix. Banks must achieve at least a Satisfactory rating under each test to obtain an overall Satisfactory rating. This evaluation does not include any lending activity performed by affiliates, as the bank has no affiliates involved in any lending activities.

Examiners conducted a full-scope review and placed the greatest emphasis on the bank’s performance in the Green Bay Metropolitan Statistical Area (MSA) AA. This AA includes most of the banking offices, holds the most deposit market share, and lending volume. Examiners utilized limited-scope examination procedures for the Non-MSA AA. This area received a full-scope review in 2020 and has a lower volume of loans, deposits, and branches than the Green Bay MSA AA.

Examiners relied upon records provided by the bank, 2020 U.S. Census, D&B demographic data, U.S. Bureau of Labor Statistics, Wisconsin Department of Workforce Development, Wisconsin Realtors Association, Moody’s Analytics, community contacts, loan information reported under HMDA, and other readily available public information. Examiners analyzed Bank of Luxemburg’s

CRA performance in relation to the bank's performance context, which includes (but is not limited to) bank size and structure, financial condition, loan mix, resources, limitations, AA demographics, economic factors, competition, loan demand, and available opportunities.

### **Activities Reviewed**

Home mortgage and commercial loans continue to represent the major product lines based on the bank's business strategy, Call Report data, and the number and dollar volume of loans originated during the evaluation period. Agricultural and consumer loans are not a major business focus, and do not represent a significant portion of the bank's loan portfolio. Therefore, agriculture and consumer loans do not provide material support for conclusions or the rating, and examiners did not include them in this evaluation. Examiners placed equal weight on home mortgage and small business lending based on the percentage of the loan portfolio and the number and dollar volume of loans originated, including secondary market lending activity. Bank records indicated that the lending focus and product mix remained relatively consistent throughout the evaluation period.

Examiners reviewed all small business loans originated in 2024 to evaluate the bank's small business lending. Management optionally elected to collect small business loan data for CRA purposes. Discussions indicated that the 2024 performance is representative of performance throughout the evaluation period, and as a result, only 2024 small business performance is analyzed and presented. For 2024, the bank originated 280 small business loans totaling \$36.6 million. D&B data provided a standard of comparison for the small business loans. The bank is not a small business reporter; therefore, the analysis does not present aggregate small business lending data.

Additionally, this evaluation considered all home mortgage loans on the bank's 2023 and 2024 HMDA Loan Application Registers (LARs). Bank of Luxemburg reported 188 loans totaling \$37.7 million in 2023 and 183 loans totaling \$43.8 million in 2024. Aggregate HMDA data and the 2020 U.S. Census demographic data provided a standard of comparison for home mortgage loans with examiners focusing more on the comparison to aggregate data.

For the Lending Test, examiners reviewed the number and dollar volume of loans. While the evaluation presents both the number and dollar volume of loans, examiners emphasized performance by the number of loans because the number of loans is a better indicator of the number of individuals and businesses served. When evaluating the Lending Test, examiners gave the most weight to Borrower Profile performance, the next most weight to the Geographic Distribution performance, and the least weight to performances under the Loan-to-Deposit Ratio and the AA Concentration criteria. Borrower Profile directly identifies how well the bank serves the traditionally underserved segments of the population, including low- and moderate-income families and smaller businesses.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior CRA evaluation dated February 13, 2023, through the current evaluation date of December 1, 2025. When determining the Community Development Test rating, the bank's community development loans, qualified investments, and community development services were evaluated in the context of available bank resources and opportunities in the AAs.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

The Lending Test is rated “Satisfactory.” The bank’s Geographic Distribution and Borrower Profile performance within each AA primarily supports this conclusion. See each separate AA analysis for performance details.

### Loan-to-Deposit Ratio

Bank of Luxemburg’s net LTD ratio is reasonable given the institution’s size, financial condition, and AA credit needs. The bank’s net LTD ratio, calculated from Call Report data, averaged 85.2 percent over the past 11 quarters from March 31, 2023, to September 30, 2025. The ratio ranged from a low of 79.7 percent as of March 31, 2023, to a high of 87.2 percent as of March 31, 2024. Similarly situated institutions (SSIs) had average net LTD ratios that ranged from 66.3 percent to 95.3 percent during the same timeframe, as reflected in the table below. Examiners selected comparable institutions based on asset size, geographic location, and lending focus.

<b>Loan-to-Deposit Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 9/30/2025 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>Bank of Luxemburg</b>	<b>720,749</b>	<b>85.2</b>
Similarly Situated Institution 1	464,589	95.3
Similarly Situated Institution 2	532,783	78.3
Similarly Situated Institution 3	522,903	74.2
Similarly Situated Institution 4	635,202	66.3
<i>Source: Reports of Condition and Income 3/31/2023 through 9/30/2025</i>		

### Assessment Area Concentration

The bank made a majority of home mortgage and small business loans, by number and dollar volume, within its AA. See the following table.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000)</b>				<b>Total \$(000)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	#	%	#	%		\$	%	\$	%	
<b>Home Mortgage</b>										
2023	157	83.5	31	16.5	188	31,415	83.4	6,240	16.6	37,655
2024	158	86.3	25	13.7	183	36,537	83.3	7,309	16.7	43,846
<b>Subtotal</b>	<b>315</b>	<b>84.9</b>	<b>56</b>	<b>15.1</b>	<b>371</b>	<b>67,952</b>	<b>83.4</b>	<b>13,549</b>	<b>16.6</b>	<b>81,501</b>
<b>Small Business</b>										
2024	248	88.6	32	11.4	280	30,095	82.3	6,481	17.7	36,576
<i>Source: Imported Bank Data; Due to rounding, totals may not equal 100.0%.</i>										

## **Geographic Distribution**

The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the AAs. The bank's lending performance in the Green Bay MSA AA supports this conclusion. The Non-MSA AA does not contain any low- or moderate-income CTs; therefore, examiners did not evaluate the geographic distribution of loans in this AA, as it would not yield meaningful conclusions. Refer to each AA analysis for details.

## **Borrower Profile**

The distribution of home mortgage and small business loans to borrowers of different income levels and businesses of various sizes reflects reasonable penetration throughout the AAs. This conclusion is supported by reasonable dispersion of home mortgage and small business loans in the Green Bay MSA AA. Lending performance was consistent in the Non-MSA AA. Refer to each AA analysis for details.

## **Response to Complaints**

Since the previous evaluation, the institution did not receive any CRA-related complaints; therefore, this criterion did not affect the Lending Test rating.

## **COMMUNITY DEVELOPMENT TEST**

An overall "Satisfactory" rating is assigned under the Community Development Test. Bank of Luxemburg demonstrated adequate responsiveness overall to the community development needs of its AAs through community development loans, qualified investments, and community development services.

## **Community Development Loans**

Bank of Luxemburg originated 71 community development loans totaling \$34.5 million. This activity level represents 5.2 percent of average total assets and 7.0 percent of average net loans based on the September 30, 2025, Call Report data. The bank's performance is consistent with three Wisconsin SSIs with reasonable performance under the Intermediate Small Institution evaluation procedures in 2024 and 2025. These comparable banks had total community development loans as a percentage of average total assets ranging from 2.3 percent to 11.3 percent. As a percentage of average net loans, the SSIs ranged from 1.5 to 15.2 percent. Examiners considered the number and dollar amount of community development loans in the Broader Statewide or Regional Areas (BSRA) because the bank has been responsive to the community development needs and opportunities in the AAs. The following two tables show the breakdown of community development loans by AA, year, and purpose.

<b>Community Development Loans by Activity Year</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2023 (Partial)	4	935	0	0	28	16,348	2	1,830	<b>34</b>	<b>19,113</b>
2024	2	1,909	0	0	16	4,915	0	0	<b>18</b>	<b>6,824</b>
2025 YTD	1	525	1	475	16	6,916	1	687	<b>19</b>	<b>8,603</b>
<b>Total</b>	<b>7</b>	<b>3,369</b>	<b>1</b>	<b>475</b>	<b>60</b>	<b>28,179</b>	<b>3</b>	<b>2,517</b>	<b>71</b>	<b>34,540</b>

*Source: Bank Data*

<b>Community Development Loans by Assessment Area</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Green Bay MSA AA	4	2,789	1	475	35	13,164	2	1,830	<b>42</b>	<b>18,258</b>
Non-MSA AA	2	480	0	0	16	10,795	1	687	<b>19</b>	<b>11,962</b>
Broader Statewide or Regional Areas	1	100	0	0	9	4,220	0	0	<b>10</b>	<b>4,320</b>
<b>Total</b>	<b>7</b>	<b>3,369</b>	<b>1</b>	<b>475</b>	<b>60</b>	<b>28,179</b>	<b>3</b>	<b>2,517</b>	<b>71</b>	<b>34,540</b>

*Source: Bank Data*

Notable examples of community development loans originated in the BSRA include two Small Business Administration (SBA) 504 loans that support economic development.

### **Qualified Investments**

During the evaluation period, Bank of Luxemburg made 28 qualified investments and donations totaling just over \$1.7 million. This includes 21 qualified donations of \$60,000 to local organizations with the primary purpose of providing community services, affordable housing, or economic development. This activity level equates to 0.3 percent of average total assets, 6.5 percent of average total equity capital, and 1.4 percent of average total securities.

Examiners assessed the bank’s performance relative to three Wisconsin SSIs with reasonable performance under the Intermediate Small Institution evaluation procedures in 2024 and 2025. These comparable banks had total qualified investments and donations as a percentage of average total assets ranging from 0.4 percent to 1.4 percent. As a percentage of average total equity capital, the SSIs ranged from 4.8 to 17.1 percent. Finally, the comparable banks had qualified investments and donations as a percentage of average total securities ranging from 1.3 to 9.6 percent. Bank of Luxemburg’s performance is consistent with these SSIs.

Examiners also considered the number and dollar amount of qualified investments in the BSRA because the bank has been responsive to the AAs’ community development needs and opportunities. The following two tables show the breakdown of qualified investments and donations by AA and year.

Qualified Investments by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	1	432	6	1,156	0	0	0	0	7	1,588
2023 (Partial)	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	0	0	0	0	0	0
YTD 2025	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>1</b>	<b>432</b>	<b>6</b>	<b>1,156</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>1,588</b>
Qualified Grants & Donations	3	37	12	8	6	15	0	0	21	60
<b>Total</b>	<b>4</b>	<b>469</b>	<b>18</b>	<b>1,164</b>	<b>6</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>28</b>	<b>1,648</b>

Source: Bank Data

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Green Bay MSA AA	2	36	9	223	3	8	0	0	14	267
Non-MSA AA	1	1	4	1	3	7	0	0	8	9
Broader Statewide or Regional Areas	1	432	5	940	0	0	0	0	6	1,372
<b>Total</b>	<b>4</b>	<b>469</b>	<b>18</b>	<b>1,164</b>	<b>6</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>28</b>	<b>1,648</b>

Source: Bank Data

Notable examples of qualified investments in the BSRA include five municipal bonds that support community services for low- and moderate-income individuals.

### **Community Development Services**

Bank of Luxemburg’s community development services activity demonstrated a low, but adequate level of responsiveness to the community development needs in the AAs, considering the institution’s capacity and the need for and availability of such opportunities. During the evaluation period, staff provided 28 instances of financial expertise or technical assistance to 13 various qualifying community development entities. This performance is similar to the previous evaluation, where staff provided 27 instances for 9 different organizations.

Examiners assessed the bank’s performance relative to three Wisconsin SSIs evaluated under the Intermediate Small Institution evaluation procedures. These comparable banks had community development services ranging from 36 to 57 services during the evaluation period. Bank of Luxemburg’s services are lower than these SSIs.

The following two tables show the breakdown of community development services by AA and year.

<b>Community Development Services by Year</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2023 (Partial)	2	1	0	0	3
2024	5	5	2	0	12
YTD 2025	5	5	3	0	13
<b>Total</b>	<b>12</b>	<b>11</b>	<b>5</b>	<b>0</b>	<b>28</b>
<i>Source: Bank Data</i>					

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Green Bay MSA AA	10	7	3	0	20
Non-MSA AA	2	4	2	0	8
<b>Total</b>	<b>12</b>	<b>11</b>	<b>5</b>	<b>0</b>	<b>28</b>
<i>Source: Bank Data</i>					

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution’s overall CRA rating.

### **GREEN BAY MSA ASSESSMENT AREA – Full-Scope Review**

#### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GREEN BAY MSA ASSESSMENT AREA**

The following sections discuss economic and demographic data and competition for deposits and loans in the Green Bay MSA AA.

#### **Economic and Demographic Data**

The Green Bay MSA AA includes all 64CTs in Brown and Kewaunee Counties. The 2020 U.S. Census assigned the following income designations:

- 1 low-income CT,
- 16 moderate-income CTs,
- 33 middle-income CTs,
- 12 upper-income CTs, and
- 2 CTs with no income designation.

The majority of the low- and moderate-income CTs in the AA are in the city of Green Bay. Both locations in Brown County are adjacent to moderate-income CTs. One CT with no income designation consists of the Green Bay Correctional Institution and the other CT with no income designation consists of an area over Lake Michigan.

Examiners used the FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle- and upper-income categories for each year are in the following table.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Green Bay, WI MSA Median Family Income (24580)</b>				
2023 (\$97,300)	<\$48,650	\$48,650 to <\$77,840	\$77,840 to <\$116,760	≥\$116,760
2024 (\$96,900)	<\$48,450	\$48,450 to <\$77,520	\$77,520 to <\$116,280	≥\$116,280
<i>Source: FFIEC</i>				

According to October 2025 economic information from Moody’s Analytics, the Green Bay, WI MSA is in the business cycle of late expansion. The economic drivers of the area are high labor force participation rate, regional healthcare hub, positive net migration, significantly undervalued housing, and access to an international port. Weaknesses include reliance on secularly declining manufacturing and a slow rate of new business formation.

The following table reflects the unemployment rates in Brown and Kewaunee Counties compared to Wisconsin and the National Averages for 2023, 2024, and YTD 2025.

<b>Unemployment Rates</b>			
<b>Area</b>	<b>2023</b>	<b>2024</b>	<b>YTD 2025*</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Brown County	2.5	2.6	2.9
Kewaunee County	2.3	2.4	2.6
State	2.8	3.0	3.2
National	3.6	4.0	4.5
<i>Source: Wisconsin Department of Workforce Development; *as of August 2025</i>			

The unemployment rate for the counties in the AA has remained steady since the previous evaluation with the rates consistently lower than both the State and National averages. In addition, the 2024 annual average wages in the AA were \$60,100. This is lower than the state annual average of \$61,690 and the national average of \$67,920.

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. According to the 2020 U.S. Census, there are 119,856 housing units in the AA. Of these, 63.0 percent are owner-occupied, 32.4 percent are rental units, and 4.6 percent are vacant. The availability of current housing stock provides financial institutions with opportunities to originate purchase, refinance, home equity, and home improvement loans. According to the Wisconsin Realtors Association data, the 2024 median sales price for a home in the AA was

\$306,225, which is up 7.9 percent from the previous year’s median price of \$283,725. The median statewide sales price was \$310,000 in 2024. The above data indicates that housing prices and costs in the AA create barriers to low- and moderate-income applicants due to the increasing median housing prices.

Based on D&B data, Non-Classifiable Establishments present the largest portion of businesses in the county at 30.9 percent, followed by Professional, Scientific, and Technical Services at 7.5 percent, and Other Services (except Public Administration) at 7.2 percent. According to the Wisconsin Department of Workforce Development, the top employers in the AA include Bellin Health, JBS Foods, Hospital Sisters Health System, Real Wisconsin Website Design, KI Inc, St. Norbert College, Schneider National Inc, and Aurora Healthcare.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenues (GARs). According to 2024 D&B data, there were 29,025 non-farm businesses and 606 farms in the AA. Of these, 58.0 percent have four or fewer employees, and 91.9 percent operate from a single location. The demographic data illustrates that there is a significant presence of small businesses operating within the AA.

The following table illustrates select demographic characteristics of the AA.

<b>Demographic Information of the Assessment Area Green Bay MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>N/A* % of #</b>
Geographies (Census Tracts)	64	1.6	25.0	51.6	18.8	3.1
Population by Geography	289,303	0.6	22.3	54.7	22.1	0.4
Housing Units by Geography	119,856	0.6	24.0	54.2	21.2	0.0
Owner-Occupied Units by Geography	75,451	0.2	16.5	58.4	25.0	0.0
Occupied Rental Units by Geography	38,829	1.1	37.5	46.4	15.0	0.0
Vacant Units by Geography	5,576	2.6	31.1	52.2	14.2	0.0
Businesses by Geography	29,025	1.2	18.8	59.8	20.3	0.0
Farms by Geography	606	0.2	2.8	78.9	18.2	0.0
Family Distribution by Income Level	72,723	19.0	18.8	23.1	39.1	0.0
Household Distribution by Income Level	114,280	22.3	17.3	19.3	41.1	0.0
Median Family Income MSA - 24580 Green Bay, WI MSA		\$81,870	Median Housing Value		\$ 182,984	
			Median Gross Rent		\$801	
			Families Below Poverty Level		6.7%	
<i>Source: 2020 Census And 2024 D&amp;B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

## **Competition**

Bank of Luxemburg operates in a competitive financial environment. According to the FDIC Deposit Market Share data, as of June 30, 2025, 16 FDIC-insured financial institutions operated 66 offices within the AA. Associated Bank NA ranked first with a 49.4 percent deposit market share, Nicolet National Bank at second with 19.8 percent, and BMO Bank NA third with 8.8 percent. Bank of Luxemburg was fifth with 3.5 percent market share.

The Lending Test does not include direct comparisons to aggregate lender performance for small business lending because the bank is not required to report small business loan data under CRA. However, because the aggregate data reflects the level of demand for small business loans, examiners discuss aggregate performance in this evaluation. Aggregate data for 2024, the most recent available data, shows 70 institutions reported 4,866 small business loans totaling \$351.1 million in the AA, indicating a high level of competition for this product. The AA's most prominent small business reporters are JPMorgan Chase Bank NA, Nicolet National Bank, and American Express National Bank. It is important to note that many non-reporting institutions originate small business loans in the AA, which suggests that competition for loans is greater than reflected in the aggregate data.

There is high competition in the AA for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. The 2024 aggregate lender data (most recent available) shows that 274 lenders reported 7,505 home mortgage loans totaling \$1.7 billion. Fox Communities Credit Union ranked first with a 10.2 percent market share followed by Capital Credit Union at 9.3 percent and Nicolet National Bank at 7.8 percent. Bank of Luxemburg was 18<sup>th</sup> with a 1.4 percent market share.

## **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also aids in determining what credit and community development opportunities are available.

Examiners obtained information from an affordable housing organization primarily serving the Green Bay area. According to the contact, Green Bay is a high-cost market for housing where the median income has not kept pace with the median home price. Prices of homes have increased steadily over the past five years at a pace that exceeds wage growth. Further, as interest rates have increased, mortgage payments have become even less affordable. Many people who currently have a low interest mortgage are not selling their current home because they do not want to incur a new mortgage at a substantially higher interest rate. Thus, the natural movement of people out of starter homes and into more expensive homes has ceased. Additionally, in the city of Green Bay, there has been a noticeable increase in short-term rentals of homes, where owners will rent out the house for sporting events in the area. The owner makes a substantial profit from the short-term rental, but it has the effect of taking these units off the market for individuals who would otherwise purchase them for full-time use.

## **Credit and Community Development Needs and Opportunities**

Considering information from the community contact, as well as demographic and economic data, examiners determined that there are ongoing credit and community development needs for affordable housing. The area's median housing values, \$306,225 in 2024, support the need for more affordable housing.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GREEN BAY MSA ASSESSMENT AREA**

### **LENDING TEST**

Bank of Luxemburg demonstrated reasonable performance under the Lending Test. The distribution of loans to borrowers of different income levels and entities of different sizes supports this conclusion.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout this AA. Examiners analyzed the lending performance in relation to bank resources and lending opportunities, focusing on the percentage of loans by number in the low- and moderate-income CTs.

### ***Small Business Loans***

Bank of Luxemburg's geographic distribution of small business loans throughout the AA reflects reasonable dispersion among CTs of various income levels. The bank's performance in the sole low-income CT is similar to the demographic data, but performance in the moderate-income CTs lags the percentage of businesses by 5.9 percentage points. While both locations in Brown County are adjacent to and in close proximity to the moderate-income CTs, competition is high with 14 financial institutions maintaining 23 branches within the moderate-income CTs. In addition, the two largest Wisconsin financial institutions, Associated Bank NA and Nicolet National Bank, are headquartered in the city of Green Bay. Lastly, only 18.8 percent of businesses in the AA are located in the moderate-income CTs, which further indicates that the demand for small business loans is limited in these areas. Based on competition and demographics, the geographic distribution of the bank's small business loans is reasonable.

Geographic Distribution of Small Business Loans Green Bay MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	1.2	3	2.1	935	4.0
Moderate	18.8	18	12.9	1,303	5.6
Middle	59.8	95	67.9	14,736	63.6
Upper	20.3	23	16.4	5,902	25.5
NA	0.0	1	0.7	286	1.2
<b>Total</b>	<b>100.0</b>	<b>140</b>	<b>100.0</b>	<b>23,162</b>	<b>100.0</b>

*Source: 2024 D&B Data; Bank Data; Due to rounding, totals may not equal 100.0%.*

### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. Bank of Luxemburg’s 2023 and 2024 low-income CT performance is higher than both the aggregate data and the percentage of owner-occupied housing units. Moderate-income CT lending in 2023 also exceeded both demographics; however, 2024 level shows a substantial decrease.

Geographic Distribution of Home Mortgage Loans Green Bay MSA AA						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2023	0.2	0.4	2	1.8	312	1.4
2024	0.2	0.3	1	1.0	116	0.5
Moderate						
2023	16.5	20.0	25	21.9	4,479	19.9
2024	16.5	20.1	12	11.4	2,053	9.2
Middle						
2023	58.4	54.6	76	66.7	14,656	65.1
2024	58.4	54.8	83	79.1	17,191	76.8
Upper						
2023	25.0	25.0	11	9.7	3,079	13.7
2024	25.0	24.8	9	8.6	3,026	13.5
NA						
2023	0.0	--	0	0.0	0	0.0
2024	0.0	0.0	0	0.0	0	0.0
<b>Total</b>						
<b>2023</b>	<b>100.0</b>	<b>100.0</b>	<b>114</b>	<b>100.0</b>	<b>22,526</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>22,386</b>	<b>100.0</b>

*Source: 2020 Census; Imported Bank Data; 2024, 2023 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0%.*

## **Borrower Profile**

The distribution of loans to borrowers within the AA reflects reasonable penetration among individuals of different income levels and businesses of various sizes. The bank’s reasonable small business and home mortgage performance support this conclusion. Examiners focused on aggregate data and the percentage of home mortgage loans to low- and moderate-income borrowers. Examiners also focused on the percentage of small business loans to operations with revenues of \$1 million or less.

### ***Small Business Loans***

The distribution of small business loans reflects reasonable penetration among businesses of various sizes in the AA.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Green Bay MSA AA</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<= \$1,000,000	87.5	88	62.9	11,595	50.1
> \$1,000,000	3.9	52	37.1	11,567	49.9
Revenue Not Available	8.6	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>140</b>	<b>100.0</b>	<b>23,162</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Although the bank’s performance is lower than the demographic data, it is within reason. Not all reporting businesses in the AA are seeking financing or may be seeking non-traditional financing, such as personal loans or credit card lending. While the bank is not a small business loan reporter, the aggregate lender performance does serve as a metric for the level of demand for small business loans in the AA. Based on the 2024 data, aggregate lenders reported that 52.3 percent of their small business loans were to businesses with GARs of \$1 million or less. This information demonstrates that the demand for such loans trails demographic data. Considering demographic and aggregate data, examiners determine that Bank of Luxemburg’s performance is reasonable.

### ***Home Mortgage Loans***

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is reasonable. While less than the percentage of low-income families, Bank of Luxemburg’s lending to low-income borrowers is similar to or exceeds the aggregate data for both years. While 2023 and 2024 lending to moderate-income borrowers is less than aggregate data, both performances are similar to the percentage of families.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Green Bay MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>HMDA Aggregate % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low						
2023	19.0	10.5	8	7.0	761	3.4
2024	19.0	7.8	10	9.5	827	3.7
Moderate						
2023	18.8	21.9	21	18.4	3,049	13.5
2024	18.8	21.7	19	18.1	2,847	12.7
Middle						
2023	23.1	24.1	16	14.0	2,994	13.3
2024	23.1	22.6	21	20.0	3,683	16.5
Upper						
2023	39.1	30.8	38	33.3	8,485	37.7
2024	39.1	34.6	37	35.2	11,840	52.9
NA						
2023	0.0	12.7	31	27.2	7,237	32.1
2024	0.0	13.3	18	17.1	3,189	14.3
<b>Total</b>						
<b>2023</b>	<b>100.0</b>	<b>100.0</b>	<b>114</b>	<b>100.0</b>	<b>22,526</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>22,386</b>	<b>100.0</b>

*Source: 2020 Census; Imported Bank Data; 2024, 2023 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0%.*

## **COMMUNITY DEVELOPMENT TEST**

Bank of Luxemburg demonstrated adequate responsiveness to the community development needs of the Green Bay MSA AA through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities.

### **Community Development Loans**

Of the bank’s 71 community development loans, 42 totaling \$18.3 million were within the Green Bay MSA AA. This is an increase in community development loans compared to the prior evaluation where Bank of Luxemburg had 28 community development loans in this AA. This performance represents 59.2 percent of total community development loans by number and 52.9 percent by dollar volume. Community development lending in this AA includes several SBA loans supporting economic development.

## **Qualified Investments**

Bank of Luxemburg had 14 qualified investments totaling approximately \$267,000 during the evaluation period in the Green Bay MSA AA. This includes one prior period investment totaling \$261,131. This level of qualified investments equals 50.0 percent of the bank's total qualifying investments by number and 16.2 percent by dollar volume. In addition, this is an increase by dollar at the prior evaluation where the bank had \$226,000 in qualified investments in this AA. Notable examples of community development investments include an investment in a minority-owned financial institution located in Green Bay.

## **Community Development Services**

Bank personnel provided 20 community development services during the evaluation period in the Green Bay MSA AA, which is an increase from the 13 community development services provided during the prior evaluation period. This represents 71.4 percent of total bank-wide community development services.

Notable examples of community development services provided in the Green Bay MSA AA include the following:

- Providing financial expertise as board member of an economic development organization that focuses on the needs of small businesses and low- and moderate-income individuals in the AA.
- Providing financial expertise as a board member of an area housing organization that focuses on affordable housing initiatives.

## **NON-MSA ASSESSMENT AREA – Limited-Scope Review**

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

#### **Economic and Demographic Data**

The Non-MSA AA includes all ten CTs in Door County. According to the 2020 U.S. Census, nine CTs are designated as middle-income. One CT with no income designation consists of an area over Lake Michigan.

Based on D&B data, Non-Classifiable Establishments present the largest portion of businesses in Door County at 23.9 percent, followed by Retail Trade at 8.7 percent, and Other Services (except Public Administration) at 8.1 percent. According to the Wisconsin Department of Workforce Development, the top employers in Door County include Fincantieri Bay Shipbuilding, Door County Medical Center, and Door County Government.

Examiners used the FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle- and upper-income categories for each year are in the following table.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
<b>WI NA Median Family Income (99999)</b>				
2023 (\$86,000)	<\$43,000	\$43,000 to <\$68,800	\$68,800 to <\$103,200	≥\$103,200
2024 (\$86,700)	<\$43,350	\$43,350 to <\$69,360	\$69,360 to <\$104,040	≥\$104,040
<i>Source: FFIEC</i>				

According to the 2020 U.S. Census, there are 25,024 housing units in the AA. Of these, 42.7 percent are owner-occupied, 11.0 percent are rental units, and 46.3 percent are vacant.

According to 2024 D&B data, there were 3,690 non-farm businesses and 178 farms in the AA. Of these, 62.5 percent of area businesses have four or fewer employees and 94.1 percent operate from a single location

The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	10	0.0	0.0	90.0	0.0	10.0
Population by Geography	30,066	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	25,024	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	10,680	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	2,749	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	11,595	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	3,690	0.0	0.0	100.0	0.0	0.0
Farms by Geography	178	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	8,816	14.7	18.2	24.1	43.1	0.0
Household Distribution by Income Level	13,429	18.3	17.5	20.6	43.6	0.0
Wisconsin Non-MSA Median Family Income	\$71,403	Median Housing Value		\$ 251,469		
		Median Gross Rent		\$805		
		Families Below Poverty Level		5.0%		
<i>Source: 2020 Census And 2024 D&amp;B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

**Competition**

Bank of Luxemburg operates in a moderately competitive environment for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, there were five FDIC insured financial institutions operating 13 offices within Door County. Nicolet National Bank was first with a market share of 62.8 percent, Associated Bank NA ranked second with 20.0 percent, and North Shore Bank was third at 8.7 percent. Bank of Luxemburg was fourth at 7.6 percent market share.

Aggregate data for 2024 shows 47 institutions reported 1,081 small business loans totaling \$82.1 million in the AA, indicating a moderate level of competition for this product. Nicolet National Bank ranked first with a 34.1 percent market share followed by JPMorgan Chase Bank NA at 15.1 percent and American Express National Bank at 14.0 percent.

In addition, 2024 aggregate data shows that 151 lenders reported 1,030 home mortgage loans totaling \$314.8 million. The three most prominent home mortgage lenders in this AA are Nicolet National Bank, Capital Credit Union, and Associated Bank NA. These three lenders accounted for 40.7 percent of the total home mortgage market share. Bank of Luxemburg ranked fourth at 5.2 percent.

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

**LENDING TEST**

The bank’s lending performance in the Non-MSA AA is consistent with the performance in the Green Bay MSA AA that was reviewed using full-scope examination procedures. The bank’s percentage of small business loans with GARs less than or equal to \$1.0 million does not compare favorably to the demographics or to small business data reporters. However, of the 108 loans in the universe, 65 of them are to one borrower with GARs over \$1.0 million which skews the data. When this lending relationship is removed, the bank’s performance substantially increases and is more in line with the demographic. The bank’s home mortgage lending performance compares favorably to aggregate and demographics. The following tables demonstrate the institution’s Borrower Profile performance.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Non-MSA AA</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<= \$1,000,000	90.0	33	30.6	2,673	38.6
> \$1,000,000	3.5	75	69.4	4,260	61.5
Revenue Not Available	6.5	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>108</b>	<b>100.0</b>	<b>6,933</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%.</i>					

<b>Distribution of Home Mortgage Loans by Borrower Income Level Non-MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>HMDA Aggregate % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low						
2023	14.8	4.8	2	4.7	107	1.2
2024	14.7	6.7	2	3.8	228	1.6
Moderate						
2023	18.3	15.1	9	20.9	1,302	14.7
2024	18.2	12.4	8	15.1	1,071	7.6
Middle						
2023	24.1	17.5	13	30.2	2,556	28.8
2024	24.1	17.3	14	26.4	2,574	18.2
Upper						
2023	42.8	53.5	16	37.2	4,478	50.4
2024	43.1	54.6	25	47.2	9,497	67.1
NA						
2023	0.0	9.1	3	7.0	446	5.0
2024	0.0	9.0	4	7.6	781	5.5
<b>Total</b>						
<b>2023</b>	<b>100.0</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>8,889</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>100.0</b>	<b>53</b>	<b>100.0</b>	<b>14,151</b>	<b>100.0</b>

*Source: 2020 Census; Imported Bank Data; 2024, 2023 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0%.*

## **COMMUNITY DEVELOPMENT TEST**

The community development performance in the Non-MSA AA is consistent with the performance in the Green Bay MSA AA which was reviewed with full-scope procedures. The bank's performance in community development loans, investments, and services in the AA is adequate as shown in the tables in the overall section.

## APPENDICES

### INTERMEDIATE SMALL 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) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## 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. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution 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 institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution'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 institution's assessment area(s) or a broader statewide or regional area including the institution'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 institution'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 (e.g, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g, innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that 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 (e.g, 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.

**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 provides assistance to 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.

## CRA Facility Based Assessment Area Map



Bank of Luxemburg's Facility Based Assessment Area consists of the entire counties of Brown, Door and Kewaunee.

## **Geographies of Assessment Area** (by Name)

### ***Brown County***

**Cities:**

- De Pere
- Green Bay

**Villages:**

- Allouez
- Ashwaubenon
- Bellevue
- Denmark
- Hobart
- Howard
- Pulaski
- Suamico
- Wrightstown

**Towns:**

- Eaton
- Glenmore
- Green Bay
- Holland
- Humboldt
- Lawrence
- Ledgeview
- Morison
- New Denmark
- Pittsfield
- Rockland
- Scott
- Wrightstown

### ***Door County***

**Cities:**

- Sturgeon Bay

**Villages:**

- Egg Harbor
- Ephraim
- Forestville
- Sister Bay

**Towns:**

- Baileys Harbor
- Brussels
- Clay Banks
- Egg Harbor
- Forestville
- Gardner
- Gibraltar
- Jacksonport
- Liberty Grove
- Nasewaupée
- Sevastopol
- Sturgeon Bay
- Union
- Washington Island

### ***Kewaunee County***

**Cities:**

- Algoma
- Kewaunee

**Villages:**

- Casco
- Luxemburg

**Towns:**

- Ahnapee
- Carlton
- Casco
- Franklin
- Lincoln
- Luxemburg
- Montpelier
- Pierce
- Red River
- West Kewaunee

# Geographies of Assessment Area

## (by Geocode)

<i>Brown County</i>				<i>Door County</i>			<i>Kewaunee County</i>			
<b>MSA/MD code</b>	<b>State code</b>	<b>County code</b>	<b>Tract</b>	<b>State code</b>	<b>County code</b>	<b>Tract</b>	<b>MSA/MD code</b>	<b>State code</b>	<b>County code</b>	<b>Tract</b>
24580	55	009	000100	55	029	100100	24580	55	061	960100
24580	55	009	000200	55	029	100300	24580	55	061	960200
24580	55	009	000302	55	029	100400	24580	55	061	960401
24580	55	009	000303	55	029	100500	24580	55	061	960402
24580	55	009	000401	55	029	100600	24580	55	061	960500
24580	55	009	000402	55	029	100700	24580	55	061	990000
24580	55	009	000500	55	029	100800				
24580	55	009	000600	55	029	100900				
24580	55	009	000700	55	029	101000				
24580	55	009	000800	55	029	990000				
24580	55	009	000900							
24580	55	009	001000							
24580	55	009	001100							
24580	55	009	001200							
24580	55	009	001300							
24580	55	009	001400							
24580	55	009	001600							
24580	55	009	001701							
24580	55	009	001702							
24580	55	009	001801							
24580	55	009	001802							
24580	55	009	002001							
24580	55	009	002002							
24580	55	009	002003							
24580	55	009	010100							
24580	55	009	010201							
24580	55	009	010202							
24580	55	009	010300							
24580	55	009	020100							
24580	55	009	020203							
24580	55	009	020204							
24580	55	009	020502							
24580	55	009	020504							
24580	55	009	020505							
24580	55	009	020506							
24580	55	009	020600							
24580	55	009	020702							

24580	55	009	020703
24580	55	009	020704
24580	55	009	020800
24580	55	009	020900
24580	55	009	021000
24580	55	009	021200
24580	55	009	021301
24580	55	009	021302
24580	55	009	021303
24580	55	009	021304
24580	55	009	021400
24580	55	009	021500
24580	55	009	021600
24580	55	009	940002
24580	55	009	940003
24580	55	009	940004
24580	55	009	940005
24580	55	009	940006
24580	55	009	940007
24580	55	009	940008
24580	55	009	980000

## Branch Information & Areas Served

<b>Main Office</b>	<b>County</b>	<b>Census Tract</b>	<b>MSA</b>	<b>ATM/ITM</b>	<b>Geographies Served</b>
630 Main Street Luxemburg, WI 54217 Hours: 8:30am-5pm M-F 9am-5pm M-F 9am-12-pm Sat	Kewaunee	9604.01	24580	ATM 24 hour	<b>Villages:</b> Luxemburg <b>Towns:</b> Luxemburg, Franklin, Montpelier, Humboldt, & Eaton
<b>Branches</b>					
<b>Algoma</b> 510 2nd Street Algoma, WI 54201 Hours: 8:30am-5pm M-F 9am-5pm M-F 9am-12-pm Sat	Kewaunee	9601.00	24580	ATM 24 hour	<b>Cities:</b> Algoma <b>Towns:</b> Ahnapee, Pierce, Lincoln, Clay Banks, Forestville <b>Villages:</b> Forestville
<b>Bellevue</b> 1311 Bellevue Street Green Bay, WI 54302 Hours: 8:30am-5pm M-F 9am-5pm M-F 9am-12-pm Sat	Brown	0207.04	24580	ATM 24 hour	<b>Cities:</b> Green Bay & De Pere <b>Villages:</b> Bellevue, Denmark, Allouez, Ashwaubenon, & Wrightstown <b>Towns:</b> Green Bay, Scott, Humboldt, Eaton, Glenmore New Denmark, Morrison, Ledgeview, Rockland, Holland, Wrightstown, & Lawrence
<b>Casco</b> 100 Old Orchard Avenue Casco, WI 54205 Hours: 8:30am-5pm M-F 9am-5pm M-F	Kewaunee	9604.02	24580	ATM 24 hour	<b>Villages:</b> Casco <b>Towns:</b> Casco & Lincoln
<b>Dyckesville</b> E166 County Road S Luxemburg, WI 54217 Hours: 8:30am-5pm M-F 9am-5pm M-F 9am-12-pm Sat	Kewaunee	9604.02	24580	ATM 24 hour	<b>Towns:</b> Red River, Green Bay, Scott, Union, Brussels
<b>Fish Creek</b> 980 Spring Rd Unit B-20 Fish Creek, WI 54212 Hours: 8:30am-4:30pm M-F Closed Sat	Door	1003.00	NA	ITM Accepts Deposits 7am-10pm	<b>Villages:</b> Egg Harbor, Ephraim, & Sister Bay <b>Towns:</b> Liberty Grove, Baileys Harbor, Egg Harbor, Gibraltar, Jacksonport & Washington

<b>Branches</b>	<b>County</b>	<b>Census Tract</b>	<b>MSA</b>	<b>ATM/ITM</b>	<b>Geographies Served</b>
<b>Howard</b> 325 Cardinal Lane Green Bay, WI 54313 Hours: 8:30am-5pm M-F Drive-up 9am-5pm M-F Lobby 9am-12-pm Sat Drive-up Only	Brown	0205.05	24580	ITM Accepts Deposits 24 hour	<b>Cities:</b> Green Bay & De Pere <b>Villages:</b> Howard, Pulaski, Suamico, Hobart & Ashwaubenon <b>Towns:</b> Pittsfield & Lawrence
<b>Kewaunee</b> 980 Marquette Drive Kewaunee, WI 54216 Hours: 8:30am-5pm M-F Drive-up 9am-5pm M-F Lobby 9am-12-pm Sat Drive-up Only	Kewaunee	9605.00	24580	ATM 24 hour	<b>Cities:</b> Kewaunee <b>Towns:</b> West Kewaunee, Carlton, Pierce, Franklin
<b>Luxemburg IGA ITM</b> 602 Center Drive Luxemburg, WI 54217 Hours: 7am-9pm Daily	Kewaunee	9604.02	24580	ITM Accepts Deposits	<b>Villages:</b> Luxemburg <b>Towns:</b> Luxemburg, Franklin, Montpelier, Humboldt, & Eaton
<b>Sturgeon Bay</b> 519 S Lansing Avenue Sturgeon Bay, WI 54235 Hours: 8:30am-5pm M-F Drive-up 9am-5pm M-F Lobby 9am-12-pm Sat Drive-up Only	Door	1008.00	NA	ATM 24 hour	<b>Cities:</b> Sturgeon Bay <b>Towns:</b> Clay Banks, Forestville, Brussels, Union, Gardner, Sturgeon Bay, Sevastopol, & Nasewauppee

# Branches Opened & Closed Over the Past Two Years

County	Open/Closed Date	Geographies Served
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**New Locations:**

N/A

**Closed Locations:**

N/A

# Deposit Products & Services

*Products & Services available at all branch locations with the exception of  
Luxemburg IGA ITM.*

Transaction fees for deposit accounts are listed in the following comparison charts with the exception of the IOLTA/IBRETA Accounts.

## ***Personal Accounts***

### **Checking Accounts**

- Everyday Checking
- Advantage Checking
- Investors Checking
- Loyalty Checking

### **Savings Accounts**

- Investors Savings
- Money Market Select
- Everyday Savings
- Star Savers
- Holiday Club
- Certificates of Deposit
- Health Savings Accounts
- Individual Retirement Accounts (IRAs)

### **Other Products/Services**

- Online Banking
- Debit Cards
- Mobile Banking
- Mobile Check Deposit
- 24-hour Telephone Banking
- eStatements
- Bill Pay
- External Funds Transfer
- Credit Insights Credit Monitoring
- Direct Deposit

## ***Business Accounts***

### **Checking Accounts**

- Business Select Plus Checking
- Business Select Checking
- Basic Business Checking
- Preferred Business Checking
- Municipal Checking
- Non-Profit Checking
- IOLTA/IBRETA Checking (no transaction fees)

### **Savings Accounts**

- Business Money Market Select
- Business Investors Savings
- Business Everyday Savings

### **Other Products/Services**

- Business Online Banking
- Debit Cards
- Mobile Banking
- Remote Deposit Capture
- 24-hour Telephone Banking
- eStatements
- Bill Pay
- ACH Services
- Positive Pay
- Merchant Card Services
- Wire Transfers

	Advantage Checking	Loyalty Checking	Everyday Checking
Minimum Balance to Open	\$1,000.00	\$25.00	\$25.00
Unlimited Check Writing	√	√	
Interest Bearing	√	√	
Online Banking	√	<b>Required*</b>	√
Bill Pay <sup>^</sup>	√	√	√
Electronic Documents <sup>^</sup>	√	<b>Required*</b>	√
Mobile Banking <sup>^</sup>	√	√	√
Mobile Check Deposit <sup>^</sup>	√	√	√
External Funds Transfer <sup>^</sup>	√	√	√
Direct Deposit	√	<b>Required*</b>	√
Credit Insights	√	√	√
24 Hour Banker	√	√	√
Debit Card	√	<b>Required*</b> (12 transactions or more posted per statement cycle)	√
\$10.00 Discount per Personal Check Order	√		
Loan Benefits <sup>◇</sup>	Discount of 0.25% annual percentage rate (APR) on consumer loans with automatic funds transfer (AFT)		
Monthly Service Charge	\$10.00 (plus \$0.50 per check/debit)	\$0.00	\$0.50 for each check that exceeds 15 checks processed per statement cycle
Ways to Avoid the Monthly Service Charge	Maintain \$5,000 minimum daily balance <b>OR</b> Maintain \$1,000 minimum daily balance <b>AND</b> one of the following: <ul style="list-style-type: none"> <li>• Minimum daily balance of \$1,500 in a savings <b>OR</b></li> <li>• Minimum daily balance of \$1,500 in a money market <b>OR</b></li> <li>• Minimum daily balance of \$1,500 in a Certificate of Deposit (CD) <b>OR</b></li> <li>• Minimum current balance of \$10,000 or more in personal, Home Equity Line of Credit (HELOC), or Real Estate Loan</li> </ul>		15 checks or less processed per statement cycle

<sup>^</sup>Requires Online Banking. Additional fees and restrictions may apply. Must log into online banking at least once within six (6) months to remain active.

<sup>◇</sup>Loan benefits include: \$10.00 discount on annual Overdraft Line of Credit Fee and discount of 0.25% Annual Percentage Rate (APR) on Consumer Loans with Automatic Funds Transfer (AFT). \*Required in order to receive premium interest rate. rev 6.2025



√ Available

	Investor's Savings <sup>^</sup>	Money Market Select <sup>^</sup>	Everyday Savings <sup>^</sup>	Star Savers <sup>^</sup> (17 years & younger)	Holiday Club
Minimum Balance to Open	\$10,000.00	\$1,000.00	\$25.00	\$10.00	\$10.00
Check Writing		√			
Interest Bearing	√	√	√	√	√
Interest Paid	Monthly	Monthly	Monthly	Monthly	Annually
Online/Mobile Banking <sup>^</sup>	√	√	√	√	√
24 Hour Banker	√	√	√	√	√
Direct Deposit	√	√	√	√	√
eStatements <sup>^</sup>	√	√	√	√	*
Automatic Funds Transfer	√	√	√	√	√
Minimum Balance to Avoid Monthly Service Charge	\$10,000.00	\$1,000.00	\$100.00	\$0.00	\$0.00
Monthly Service Charge	\$12.00	\$10.00	\$5.00	\$0.00	\$20.00 **

\*Monthly or quarterly statements available when combined with a checking or savings account otherwise statement is annual. <sup>^</sup>Requires Online Banking. Additional fees and restrictions may apply. Must log into Online Banking at least once within six (6) months to remain active. <sup>^</sup> There will be an excess transaction fee of \$3.00 for each debit/withdrawal that exceeds six (6) transactions per month. The excess transaction fee will not apply to in-person and automated teller machine (ATM) debit/withdrawals. \*\*Open withdrawal for Holiday Club is October 1 - January 31. Early withdrawal fee will apply for each withdrawal/debit made outside of the open withdrawal period. rev 6.2025

	Basic Business Checking	Preferred Business Checking	Business Select Checking	Business Select Plus Checking
Minimum Balance to Open	\$100.00	\$1,000.00	\$100.00	\$25,000.00
Minimum Daily Balance		\$1,000.00		\$25,000.00
Monthly Service Charge (if minimum daily balance is not maintained)		\$15.00		\$15.00
Interest Bearing	No	No	No	Yes
Debit Card	√	√	√	√
Online Banking <sup>^</sup>	√	√	√	√
Mobile Banking <sup>^</sup>	√	√	√	√
eStatements <sup>^</sup>	√	√	√	√
24 Hour Telephone Banking	√	√	√	√
ACH Services <sup>^</sup>	√	√	√	√
Remote Deposit Capture <sup>^</sup>	√	√	√	√
Monthly Analysis	No	No	Yes	Yes
Transaction Limits	40 transactions: -telephone transfers -deposits (mobile, in- branch, night depository) -in-branch withdrawals -checks cleared	125 transactions: -telephone transfers -deposits (mobile, in- branch, night depository) -in-branch withdrawals -checks cleared -deposited check items	Unlimited	Unlimited
Transaction Fees (each item in excess of transaction limit)	\$0.50	\$0.50		
Analysis Fees			Analysis Fee: \$14.00 In Branch Transactions: -Deposit Ticket: \$0.12 -Withdrawal: \$0.12 Checks Deposited: \$0.07 ACH Deposit/Debit: \$0.07 Checks Cleared: \$0.12 Telephone Transfers: \$1.00	Analysis Fee: \$14.00 In Branch Transactions: -Deposit Ticket: \$0.12 -Withdrawal: \$0.12 Checks Deposited: \$0.07 ACH Deposit/Debit: \$0.07 Checks Cleared: \$0.12 Telephone Transfers: \$1.00
Earnings Credit (applied to offset Analysis Fees)			Refer to Rate Sheet	Refer to Rate Sheet

<sup>^</sup> Requires Online Banking. Additional fees and restrictions may apply. Must log into online banking at least once within six (6) months to remain active. Ask us for details.  
Rev 02.2025



	Business Investor's Savings	Business Money Market Select	Business Everyday Savings
Minimum Balance to Open	\$10,000.00	\$1,000.00	\$100.00
Check Writing		✓	
Interest Bearing	✓	✓	✓
Interest Paid	Monthly	Monthly	Monthly
Online/Mobile Banking <sup>^</sup>	✓	✓	✓
24 Hour Banker	✓	✓	✓
Direct Deposit Credit	✓	✓	✓
eStatements <sup>^</sup>	✓	✓	✓
Automatic Funds Transfer	✓	✓	✓
Minimum Balance to avoid Monthly Service Charge	\$10,000.00	\$1,000.00	\$100.00
Monthly Service Charge	\$12.00	\$10.00	\$5.00

<sup>^</sup>Requires Online Banking. Additional fees and restrictions may apply. Must log into online banking at least once within six (6) months to remain active. There will be an excess transaction fee of \$3.00 for each debit/withdrawal that exceeds six (6) transactions per month. The excess transaction fee will not apply to in-person and automated teller machine (ATM) debit/withdrawals. rev 2.2025



## 2025 Schedule of Fees

Effective February 10, 2025

(Changes noted in Bold)

Item	Fees	
*Overdraft (each debit or check paid)	\$35.00	
*Return Item (non-sufficient funds item returned unpaid)	\$35.00	
Stop Payment (check/ACH)	\$30.00	
Overdraft Protection/ Minimum Balance / Excess Cash (automatic transfer sweep between accounts-does not include automatic funds transfers to loan accounts)	\$10.00 per transfer	
Cashier's Checks	\$6.00	
<b>**Return Deposit Item (deposited check/item returned unpaid)</b>	<b>\$15.00</b>	
<b>**Return ACH Deposit Item (deposited ACH item returned unpaid)</b>	<b>\$15.00</b>	
Wire In /Wire Out (domestic)	\$25.00	
<b>Wire In/Wire Out (international)</b>	<b>\$50.00</b>	
Closing Account (early account closing within 120 days of opening)	\$30.00	
Check Printing	Fee based on style of order	
Counter Check	\$2.00	
Photocopies	\$0.25 per page	
Fax Charges	\$5.00 plus \$1.00 per additional page	
<b>Foreign Currency Order (additional 3<sup>rd</sup> party fee may apply)</b>	<b>\$8.00</b>	
<b>Canadian Check Deposit (prior approval required)</b>	<b>\$7.00</b>	
Recreate Account Statement	\$5.00	
Temporary Statement	\$2.00	
<b>Duplicate Mailed Statement</b>	<b>\$8.00</b>	
<b>Undeliverable Mail (monthly/quarterly deposit statements)</b>	<b>\$10.00 per month</b>	
<b>Forwarded Mail (monthly/quarterly deposit statements)</b>	<b>\$10.00 per month</b>	
Check Image Copy (multiple checks on a page can be requested)	\$3.00 per page	
<b>Image Statement (Images included in a monthly statement)</b>	<b>\$8.00</b>	
Dormant Account (for balances below \$250)	\$10.00 per month	
<b>Garnishments/Tax Levies</b>	<b>\$200.00</b>	
<b>Account Research</b>	<b>\$50.00 per hour</b>	
<b>Account Balancing Assistance</b>	<b>\$50.00 per hour</b>	
Debit/ATM Card Replacement	\$8.00	
Rolled Coin	\$0.50	
Loose Coin (for non-customers)	10% of coin total	
IRA Transfer / SEP Transfer / HSA Transfer (out of Bank)	\$50.00	
Health Savings Account (HSA) Set-Up	\$25.00	
<b>Safe Deposit Box Fees:</b>		
Safe Deposit Box Payment (Annual rent- customer can save \$5.00 off these annual amounts with an automatic payment transfer from a Bank of Luxembourg checking, savings or money market account)	<b>3x5</b>	<b>\$40.00</b>
	5x5	\$50.00
	3x10	\$60.00
	<b>5x10</b>	<b>\$80.00</b>
	<b>10x10</b>	<b>\$100.00</b>
Late Fee (If Safe Deposit Box annual rent is unpaid 30 days after annual rent due date)	\$35.00	
Replacement Key	\$25.00	
Drill to Open	Market Rate	

\*This fee applies to overdraft and return items created by check, in-person withdrawal, ATM withdrawal or other electronic means as applicable. A maximum of five (5) Overdraft or Return Item Fees will be assessed per day for consumer accounts; however, for business accounts there is no maximum fees assessed per day. For business accounts only, a return item and overdraft fees may be charged more than once per item when merchants resubmit the item against insufficient funds.

\*\*Fees apply to business accounts only.

# Loan Products & Services

*Products & Services available at all branch locations with the exception of  
Luxemburg IGA ITM.*

Transaction fees listed where applicable.

## **Consumer Loan Products**

- Personal Loans – No origination fee
- Personal Line of Credit – No origination fee
- Overdraft Protection (ODP) – Annual fee \$30 (no origination fee)
- Fixed Rate Mortgage Loans – Origination fee \$1,000; Underwriting fee \$150
- Adjustable Rate Mortgage (ARM) Loans - Origination fee \$1,000; Underwriting fee \$150
- Home Equity Loans – Origination fee \$250; Underwriting fee \$150; includes both HEL and HEL ARM (second mortgages)
- Home Equity Line of Credit (HELOC) – Annual fee \$50 (no origination fee)
- Construction Loan – Origination fee \$1,200 (6-month), \$1,400 (12-month); Underwriting fee \$150
- Vacant Land Loan – Origination fee \$599; Underwriting fee \$150
- Bridge Loan – Origination fee \$1,000; Underwriting fee \$150
- Manufactured Home on Owned Land – Origination fee \$1,000; Underwriting fee \$150
- Manufactured Home on Leased Lot – Origination fee \$509; Underwriting fee \$150
- New Condo Development – Origination fee \$1,500; Underwriting fee \$150
- WHEDA – Origination fee \$1,000; Underwriting fee \$150

## **Business Loan Products**

- Business Loans – Origination fee up to 2% of loan amount
- Commercial Lines of Credit
- Agriculture Loans
- SBA Loans
- Municipal Loans

## Loan to Deposit Ratio 2025

	<b>Loans Outstanding (000)</b>	<b>Deposits Outstanding (000)</b>	<b>Loan to Deposit Ratio</b>
<b>March 31</b>	\$510,302	\$589,715	86.53%
<b>June 30</b>	\$533,652	\$620,719	85.97%
<b>September 30</b>	\$549,197	\$628,445	87.39%
<b>December 31</b>	\$539,110	\$623,039	86.53%

## **Home Mortgage Disclosure Act Notice**

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions are also available online. For more information visit the Consumer Financial Protection Bureau's Web site ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).