

SOUTHERN MICHIGAN BANK & TRUST

ACH Origination Data Security & Risk Management Attestation

Company Name: _____

As an ACH originator your organization must implement and maintain security procedures intended to protect the private ACH data obtained, stored and transmitted as part of your origination, and fraud monitoring procedures intended to identify and stop ACH entries initiated due to fraud. As your Originating Depository Financial Institution, we must make you aware of your obligations under the Nacha Operating Rules. Please refer to the ACH Service Addendum in your Master Service Agreement for additional details.

Pursuant to Article One, Section 1.6 Security Requirements, you attest that:

The Company has established, implemented and as appropriate makes updates to policies, procedures and systems intended to protect the confidentiality and integrity of Protected Information until destruction, to protect against anticipated threats or hazards to the security or integrity of Protected Information until destruction, and unauthorized use of Protected Information that could result in substantial harm to a natural person.

Pursuant to Article Two, Section 2.2, Subsection 2.2.4 Identification of Unauthorized Entries or Entries Authorized Under False Pretenses, you attest that:

The Company has assessed its inherent ACH fraud risk based on transaction volume, exposure, complexity, and susceptibility to fraud schemes including unauthorized entries and false pretenses. Monitoring procedures have been designed to align with this risk profile.

Please return your completed attestation to SMBT Treasury Services at treasuryservices@smb-t.com.

Authorized Signature

Name

Title

Date